

# UNITED STATES DEPARTMENT OF AGRICULTURE

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THE UNITED STATES DEPARTMENT OF AGRICULTURE

Subcommittee on            )  
Inspection Methods        )  
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Subcommittee on            )  
Inspection Methods        )  
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Lincoln Room  
Quality Hotel  
1200 N. Courthouse Road  
Arlington, VA 22201

Wednesday,  
May 5, 1999

The meeting in the above-entitled matter was  
convened, pursuant to notice, at 7:00 p.m.

APPEARANCE:

Kathleen Hanigan,  
Chairperson

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P R O C E E D I N G S

(7:00 p.m.)

1  
2  
3 MS. HANIGAN: Okay. Welcome to the subcommittee  
4 meeting on inspection methods. And I am Katie Hanigan. I  
5 think the room already realizes that. I am going to switch  
6 the agenda just slightly. We are going to talk about  
7 campylobacter first. And we are going to run that right up  
8 until 8 o'clock. And at 8 o'clock, we are going to switch  
9 over, and then we will be talking about the  
10 reclassification, if you will, of the FSIS inspector.

11 How I would like to do it is for the first 15  
12 minutes, if anybody has any background questions that they  
13 want to direct at Gerri, then I would like her to go through  
14 any background information that people think they need, a  
15 little bit more information on it.

16 From 7:15 to quarter of 8:00, we will have general  
17 discussion, and from quarter of 8:00 to 8 o'clock, we need  
18 to draw some kind of conclusion, if we are going to draw  
19 one, and prepare a report for the committee tomorrow. And  
20 then we'll do the same format from 8:00 to 9:00 on the  
21 inspector reclassification of jobs.

22 So at this time, I will open the floor by asking  
23 if any of the subcommittee members want Gerri to go back  
24 through any data she presented or any background information  
25 before we open the general discussion on that. Any

1 questions?

2 MS. SMITH-DeWAAL: I have something. I need to go  
3 back to the question I asked earlier on table 2.

4 MS. HANIGAN: Where is Gerri?

5 (Simultaneous discussion)

6 MS. HANIGAN: And, Jeanne, would you be so kind --  
7 would you record any flip chart things that we need, if you  
8 would be so kind.

9 MS. SMITH-DeWAAL: I'm Caroline Smith-DeWaal, with  
10 CSPR, just for the record. I still don't understand how you  
11 come up with the prevalence. If 60 percent of the plants  
12 are failing, then that doesn't represent a median.

13 MS. RANSON: Okay. I'm not quite sure I  
14 understand how this was done either. I didn't prepare it.  
15 But I do know it was not done in the same fashion, exactly  
16 the same fashion, that the salmonella performance standards  
17 were done. An 80 percent, I guess, probability of passing  
18 was worked into that. And that hasn't been done here. So  
19 we probably shouldn't take that too seriously.

20 MS. SMITH-DeWAAL: Because if it is the median,  
21 you should have 50 percent passing and 50 percent failing.  
22 If it is the mean, it might be --

23 MS. RANSON: I believe -- yeah. I believe what  
24 was done -- okay. If you look at the 78.8 percent  
25 prevalence, I think then each plant was looked at

1 individually, then maybe looked --

2 MS. SMITH-DeWAAL: Right.

3 MS. RANSON: -- looked at how many samples were  
4 analyzed and your positive rate based on samples analyzed.  
5 And in this case, there is only one to five data points in  
6 our salmonella performance standard for broilers. There is  
7 51 data points. So you really shouldn't take this too  
8 seriously.

9 MS. SMITH-DeWAAL: By one to five data points,  
10 does that go to the campy or to the --

11 MS. RANSON: Campy analyses. Only one to five  
12 analyses where if you are looking at the salmonella  
13 performance standard, there is 50 -- a sample set is 51  
14 samples that you look at before you make a judgment on  
15 whether or not the prevalence has been --

16 MS. SMITH-DeWAAL: Okay. So this -- in terms of  
17 the baseline stuff, the comparative data on baselines would  
18 be 88 percent positive. Did you do any analysis? Because  
19 it sounds to me like this is different than what the -- the  
20 salmonella prevalence, the comparative figure would be the  
21 baseline figure here.

22 MS. RANSON: Right, right.

23 MS. SMITH-DeWAAL: And I am interested in what --  
24 how many establishments would pass or fail that number.

25 MS. HANIGAN: The 88 percent?

1 MS. SMITH-DeWAAL: Yeah.

2 MS. RANSON: Yeah. I don't know how many would  
3 pass or fail that.

4 DR. HURLBERT: You really didn't look at the 88  
5 percent, right? What you were doing -- your pass/fail is on  
6 your prevalence that you have in this column. Is that --  
7 you didn't consider the past baseline.

8 MS. RANSON: No. The past baseline was not  
9 considered. As I say, I believe what was done is you would  
10 look at a particular plant individually. If you ran five  
11 and a -- there really wasn't enough analyses done in order  
12 for this to be real meaningful. As I say, there was only  
13 five, maximum of five samples tested from any one  
14 establishment. So --

15 MS. SMITH-DeWAAL: Yeah. But I'm not sure there  
16 were more tested in the salmonella data. I mean, the  
17 salmonella data was how many --

18 DR. HURLBERT: Didn't they have 300 --

19 MS. SMITH-DeWAAL: Yeah, total samples.

20 MS. RANSON: You've got two things here. You have  
21 got --

22 MS. SMITH-DeWAAL: So you have got 200 -- you have  
23 got 325 total samples between the two studies. And I  
24 just --

25 MS. RANSON: Okay.

1 MS. SMITH-DeWAAL: I'm -- and I don't understand  
2 enough. I am just concerned that we are not comparing  
3 apples and apples.

4 MS. RANSON: This may explain it. The 78.8  
5 percent there that you see for the campylobacter monitoring,  
6 that is looking across all establishments and all samples  
7 taken, okay?

8 MS. SMITH-DeWAAL: Of the 204 establishments.

9 MS. RANSON: Yeah. That is looking at all 204,  
10 all 204 samples run. But then when you start making a  
11 judgment about how many establishments would meet the 78.8,  
12 you are looking at a single establishment individually  
13 and --

14 MS. SMITH-DeWAAL: Okay. I --

15 MS. RANSON: You are saying, okay, from  
16 establishment X, I took five samples. And then you are  
17 looking at the prevalence there. Did you get less than  
18 78 percent positive, or did you get more than 78 percent  
19 positive? I mean, you are looking at a total of five  
20 samples analyzed.

21 MS. SMITH-DeWAAL: How many total plants does  
22 this -- when you say number of establishments that would  
23 pass or fail, what is the universe of establishments we are  
24 dealing with?

25 MS. RANSON: Okay. The universe of establishments

1 is that 204.

2 MS. SMITH-DeWAAL: But I thought you took one to  
3 five -- I am confused about that then, whether the 204 is  
4 the number of samples or the number of establishments  
5 because you took one to five samples at each establishment.

6 MS. RANSON: Okay. The --

7 (Simultaneous discussion)

8 MS. HANIGAN: No. Because I think it is a key  
9 point because if they only took one sample of the plant, and  
10 it failed --

11 MS. SMITH-DeWAAL: Right.

12 MS. HANIGAN: -- then they would be at a  
13 100 percent failure.

14 MS. RANSON: Right. And that is why really you  
15 can't put too much weight in this.

16 MR. DENTON: If you take one sample in your  
17 recovery, you have got 100 percent.

18 MS. RANSON: Right. You have got 100 percent.

19 MS. SMITH-DeWAAL: So are we looking at 204  
20 plants, or are we looking at 204 samples?

21 (Simultaneous discussion)

22 DR. HURLBERT: Look on the table one. The campy  
23 monitoring, the 500, it says samples analyzed. So that  
24 would be 500 samples analyzed out of the 204 plants, right?

25 MS. SMITH-DeWAAL: All right. Thank you.

1 MS. RANSON: Okay. Bringing in those samples  
2 across the board, that is where the 78 percent --

3 DR. HURLBERT: Yeah.

4 MS. RANSON: That's where the 78 --

5 DR. HURLBERT: So it's 394 of 500 is 7.8.

6 MS. RANSON: Okay. And then to make that judgment  
7 that is going to say 60 percent aren't going to meet the  
8 prevalence, you are only looking at, say, the one to five  
9 samples that was analyzed in each plant. And as was brought  
10 up, if you only analyze one sample, the prevalence at that  
11 plant is 100 percent, if it is looked at as positive.

12 MR. DENTON: It is not a complete data set yet.

13 MS. SMITH-DeWAAL: If you just --

14 MR. DENTON: We couldn't use this to --

15 MS. SMITH-DeWAAL: So we -- yeah. So we can't  
16 really -- the conclusions you have reached regarding whether  
17 we could use prevalence in a way that is comparable to the  
18 way we use it, we still don't have as much data as --

19 MS. RANSON: We're not entirely sure. But because  
20 we have such a high prevalence in general overall looking at  
21 those 500 samples, that may indicate to us that we might  
22 have to go to something else than prevalence.

23 MS. SMITH-DeWAAL: Right. I just -- we don't have  
24 the total answer to that, it sounds like. It suggests  
25 something, but it doesn't totally answer it.

1 MS. RANSON: Right, right.

2 MS. HANIGAN: And I think that's a key point,  
3 Jeanne, for the chart, that right now the data presented is  
4 incomplete. Is that in agreement with everybody?

5 MS. RANSON: Right. This is very initial data.  
6 This is our first look at it.

7 MS. HANIGAN: Okay. Other questions?

8 MS. SMITH-DeWAAL: Can I add to that, though? The  
9 data is incomplete to conclude that we couldn't use a  
10 campylobacter prevalence as a performance standard. That  
11 was the point that was made at the meeting. And that's --

12 MS. RANSON: They can say that, to conclude  
13 that --

14 MS. SMITH-DeWAAL: Yeah, that you couldn't use --

15 MS. RANSON: The campy prevalence?

16 MS. SMITH-DeWAAL: Yeah, that you couldn't use  
17 campylobacter prevalence as a performance.

18 MR. DENTON: But it is going to be highly unlikely  
19 that we could use it.

20 MS. SMITH-DeWAAL: That may be true. We just  
21 don't know.

22 MR. DENTON: But somewhere in the 80 percent range  
23 of prevalence, it is going to be almost impossible to have  
24 anything that would meet the criteria, unless we set the  
25 criteria awfully high, which is not where we want to go.

1 MS. SMITH-DeWAAL: Right.

2 MS. AXTELL: So it appears unlikely to be useful,  
3 but we can't conclude that it could not be useful.

4 MR. DENTON: We can't conclude yet, but it appears  
5 that it could rule out prevalence.

6 MS. HANIGAN: And that is because --

7 MR. DENTON: If this trend continues.

8 DR. HURLBERT: Well, we don't -- it is like you  
9 said. We have nothing seasonal right now.

10 MR. DENTON: Right.

11 DR. HURLBERT: Everything was --

12 MR. DENTON: One season.

13 MS. RANSON: We really need to look at a lot more  
14 samples analyzed from each establishment. That 60 percent  
15 failing may change.

16 MS. HANIGAN: A question I would have for you,  
17 Gerri, based on some Food Net data that I have been  
18 watching, do you have any feeling as to why the incident  
19 level increases or peaks, if you will, through the summer  
20 months?

21 MS. RANSON: It may have something to do with the,  
22 I guess, viability of campylobacter. The high temperatures  
23 might favor keeping it around longer. I have also heard  
24 things about rainy weather. You might see more  
25 campylobacter with rainy weather as well.

1 MS. HANIGAN: Do you think it has anything to do  
2 with food preparation methods as far as being grilled and  
3 not being cooked as well as during the holiday season in the  
4 winter when you are doing the cooking inside, et cetera, as  
5 far as grilling chicken on grills versus cooking the  
6 traditional turkey or chicken in the oven in a roaster? Do  
7 you think --

8 (Simultaneous discussion)

9 DR. HURLBERT: -- is that you generally get a  
10 spike in the summer?

11 MS. HANIGAN: With respect to campylobacter,  
12 though?

13 (Simultaneous discussion)

14 MS. RANSON: As far as method of cooking, the  
15 bottom line is you want to make sure you are doing a good  
16 job cooking. If you have things going on like barbecues, I  
17 am often hearing about people taking their raw chicken out  
18 on their plate, bringing it out, cooking it. The plate is  
19 sitting there on the picnic table, then the cooked chicken  
20 goes back on the plate.

21 MS. HANIGAN: Okay.

22 MS. SMITH-DeWAAL: But there is nothing -- I mean,  
23 I am looking here at campylobacter data. What is going to  
24 -- I mean, it sounds like, though, we are -- we don't know.  
25 It may simply be that there is more campylobacter around.

1 And so the -- as opposed to -- we don't know whether  
2 consumer handling is --

3 DR. HURLBERT: Yeah, it could be. I mean, there  
4 is -- I don't guess there has been --

5 MS. SMITH-DeWAAL: It doesn't grow. I mean, my  
6 understanding of campylobacter -- and please correct me if I  
7 misspeak because I am not a scientist. But my understanding  
8 is the highest numbers we are going to see are the ones  
9 leaving the plant, and that we will see die-off and -- that  
10 it doesn't grow in the same way that salmonella does, so  
11 that mishandling is not necessarily going to be the deciding  
12 factor on whether someone gets sick in the same way that  
13 salmonella -- if you mishandle salmonella, one will grow to  
14 be very large. But my understanding of campylobacter is it  
15 dies off.

16 MR. DENTON: If it is a temperature abuse  
17 mishandling, then you get the increase of salmonella. I  
18 suspect that you are going to get a similar situation with  
19 campylobacter.

20 MS. RANSON: Yeah. In an abuse situation, you may  
21 have campylobacter --

22 MR. DENTON: There are several different ways to  
23 abuse the product.

24 MS. RANSON: -- if the atmosphere is right, if  
25 somehow conditions become right. There is the possibility

1 you could get growth of campylobacter. But generally, you  
2 are going to see increases in refrigerated products. And  
3 you're right. The general thing kind of would be die-off.

4 MS. SMITH-DeWAAL: Right.

5 MS. RANSON: One thing that is going to be very  
6 helpful to us connected to Food Net, there are some case  
7 control studies going on with campylobacter. There are  
8 going to look at -- try to pinpoint what foods are causing  
9 problems. We are really looking forward to seeing that data  
10 come out. And we know pork has a prevalence from our '94-  
11 '95 baseline about 30 percent. But generally, there aren't  
12 a lot of reports of pork being associated with  
13 campylobacteriosis. But the Food Net data coming out of  
14 these case control studies may answer some questions for us.

15 So we are really looking forward to seeing if we  
16 need to hone in on any other foods.

17 MS. HANIGAN: Okay. It is now very quickly 7:15.

18 If we still need background from Gerri, we'll continue. If  
19 not, general discussion as to the issue of campylobacter.

20 DR. HURLBERT: Gerri, do you know -- I'm assuming  
21 that we remember right, that for the salmonella there were  
22 300 samples taken. Is that what you are going to do for the  
23 broilers with the campylobacter for the baseline?

24 MS. RANSON: Okay. The '94 -- oh, I had it with  
25 me. I don't remember how many samples were taken for

1 salmonella. But I believe it was around the same number  
2 that were taken for campylobacter, which is in the 1,200,  
3 1,300 sample range.

4 DR. HURLBERT: Okay. For baseline? Okay.

5 MS. HANIGAN: A question I have for you, is the  
6 agency -- you know, we talked in the meeting very generally  
7 about we don't really have a risk assessment done, and we  
8 don't know infectious dose. Give us some background on the  
9 current thinking of the agency on those two areas.

10 MS. RANSON: Risk assessment for campylobacter is  
11 something that we feel is going to be very useful. It is  
12 going to help us think about mitigation strategies for  
13 campylobacter, much in the same way as the salmonella  
14 enteritidis risk assessment provided some very valuable  
15 information. You know, this is something that we are  
16 seriously looking at. We are in the planning and  
17 formulation stages of this project. We haven't assembled a  
18 team of experts yet, but this is something that we would  
19 like to do.

20 MS. HANIGAN: Do you have any kind of a time  
21 frame? I am not trying to pin you down on it. But is that  
22 in this calendar year that we're in?

23 MS. RANSON: I don't think so. This is really in  
24 very early stages of planning and thinking.

25 MS. HANIGAN: So it may be in calendar year 2000

1 before the risk assessment?

2 MS. RANSON: Yeah. I couldn't answer that. I  
3 think so.

4 MS. HANIGAN: And that would probably roll out  
5 then as well into possibly the infectious dose?

6 MS. RANSON: That would help us. There are a few  
7 reports out in the literature. I think I remember seeing  
8 between 500 and 800 cells in one report. There are a  
9 handful of reports out there where some studies were done,  
10 feeding studies. There is limited information available on  
11 that.

12 MS. SMITH-DeWAAL: Dale Morse gave me some  
13 material to kind of read into the record. Do you want me to  
14 go ahead and do that? Because he answered some of those  
15 questions here.

16 MS. HANIGAN: Sure.

17 MS. SMITH-DeWAAL: But I need to kind of do it as  
18 a group. He said that campylobacter is a leading cause of  
19 bacterial foodborne disease in the U.S., and it is  
20 imperative that prevention be addressed. Most cases are  
21 sporadic. They are not showing up as outbreaks, which  
22 actually showed up in CSPI's data as well. Infectious doses  
23 as low as 800 organisms, consumption of raw milk and poultry  
24 has been associated with illness, but raw milk is becoming  
25 less and less of a concern. It is really poultry where the

1 problems seem to be right now.

2 High level of contamination is found in poultry.  
3 But prevention is dependent on reduction in levels of  
4 contamination prior to the product reaching consumers.  
5 Improved methods of testing, qualitative and quantitative,  
6 should address the previous concerns that the policy was  
7 ahead of the science. This was in earlier discussions of  
8 the committee. And since the organism is fragile and  
9 doesn't multiply readily like salmonella, a performance  
10 standard to reduce quantitative levels of campylobacter has  
11 the same potential of being more successful than with -- no,  
12 has the potential of being more successful than salmonella.

13 Campylobacter and salmonella growth is likely  
14 independent of each other, so you need both. You cannot  
15 control campylobacter simply by trying to control  
16 salmonella. And the committee should support adding a  
17 performance standard, taking as a goal to help reduce  
18 illnesses due to this leading foodborne pathogen. While  
19 there are limitations in the current methodology, the  
20 addition should spur development of better and improved  
21 methods.

22 And Dale is public health representative on the  
23 panel. He could not attend tonight because he has a CDC  
24 board meeting that he had to be at. So those were his  
25 suggestions for the subcommittee.

1 MS. HANIGAN: Okay. Jeanne, would you put up  
2 there something under risk assessment as far as currently in  
3 the planning stage, now incomplete at this time, the time of  
4 this meeting.

5 MS. SMITH-DeWAAL: What would we -- could I just  
6 ask what, in terms of discussion, what would we want? Is  
7 the sole goal of a risk assessment to look at the data on  
8 infectious dose? Is there any other purpose for risk  
9 assessment?

10 MS. RANSON: We would probably look at the source  
11 of campylobacter to our food supply along the whole -- what  
12 is -- the continuum, along the farm to table continuum, look  
13 for places where we can add controls, so not only infectious  
14 dose.

15 MS. SMITH-DeWAAL: Is the agency -- it sounds  
16 like, though, the agency could move forward while it is  
17 working on a risk assessment.

18 MS. RANSON: Yeah.

19 MS. SMITH-DeWAAL: I mean, it doesn't need a risk  
20 assessment to take at least preliminary action on  
21 campylobacter.

22 MS. RANSON: Right. And I guess some of the  
23 things I brought up today, it may be difficult in making the  
24 decisions how we want to handle a performance standard. And  
25 one of the things we did plan to do is bring the performance

1 standard to the NACMCF as far as how to handle it  
2 scientifically, what is the best way to approach the  
3 performance standard.

4 MS. SMITH-DeWAAL: Right. But the agency also has  
5 a history here -- I mean, we didn't do a -- they didn't do a  
6 risk assessment on salmonella before they delivered a  
7 performance standard on salmonella. They based it on what  
8 was technologically achievable based on the median  
9 prevalence in the industry, and then gave the industry an  
10 incentive to fix the problem. I mean, they didn't tell the  
11 agency how to fix it. They just said you have got to fix  
12 this. Here is -- and, you know, we -- they chose the median  
13 in part so they had 50 percent already achieving it, and an  
14 incentive for the other half of the industry to get better.

15 So, I mean, there is a precedent here for how to  
16 set a performance standard clearly, and infectious dose  
17 would be -- you know, would give us even more data on which  
18 to work. And in the long run, we would like all performance  
19 based on infectious dose. But we don't have that right yet.

20 MS. HANIGAN: Well, and I think she brings up a  
21 key point that needs to be -- the salmonella performance  
22 standard is a precedent that was set, if we did not have the  
23 risk assessment done before the performance standard. I  
24 think that is a key --

25 DR. HURLBERT: But -- I'm sorry, Katie. But the

1 risk assessment and the baseline gathering that started with  
2 the chickens here, that can run together, correct?

3 MS. RANSON: Right.

4 DR. HURLBERT: We have to reevaluate the new  
5 methodology that is being used and come up with the  
6 baseline. So it is not like we are holding off on doing  
7 baseline until we get the risk assessment, right?

8 MS. RANSON: Right.

9 DR. HURLBERT: I mean, this will happen together.

10 MS. RANSON: And Dr. Wachsmuth had even mentioned  
11 earlier today that maybe we could contract out some of the  
12 risk assessment work. So that was encouraging to hear.

13 MS. HANIGAN: How long would it take to get an  
14 accurate baseline?

15 MS. RANSON: We're hoping about a year.

16 MS. HANIGAN: A year from now?

17 MS. SMITH-DeWAAL: And it has already started,  
18 right?

19 (Simultaneous discussion)

20 MS. RANSON: The only glitch for us could be that  
21 we would like to run the entire baseline with the new  
22 campylobacter method, and we don't have it in hand yet, and  
23 it hasn't been evaluated. We are either going to have to  
24 extend the baseline so that we can run an entire year's  
25 worth of data, approximately 1,200 samples, but we want to

1 collect 1,800 samples to account for discards, et cetera.

2 We're hoping that we can get the entire study run  
3 with the new ARS method. If we can't, there may be some  
4 bridging studies we can do, maybe using a conversion factor  
5 if that is appropriate.

6 DR. HURLBERT: I know I should know this, but you  
7 are not using the new ARS method.

8 MS. RANSON: No. We're not using it yet. It  
9 hasn't been released to us. The plating media is going to  
10 be commercially available. That is one of the things  
11 holding this up.

12 MS. HANIGAN: Did you say you -- I'm sorry. Did  
13 you want to collect 18,000 samples or 1,800?

14 MS. RANSON: 1,800.

15 MS. HANIGAN: Go ahead, Terry. I'm sorry.

16 MR. BURKHARDT: What is the campylobacter sampling  
17 policy for? Is the agency doing any on those?

18 MS. RANSON: No. And generally, if you look in  
19 the literature, it doesn't appear to be present in ready-to  
20 -eat foods .

21 MR. BURKHARDT: But it is causing illness.

22 MS. RANSON: Right.

23 MR. BURKHARDT: From all foods that are purchased  
24 raw and then --

25 MS. RANSON: Right.

1           MR. BURKHARDT: -- not properly cooked or  
2 mishandled. I mean --

3           MS. RANSON: Illness is associated with raw and  
4 undercooked chicken generally, sporadic illnesses. In  
5 consumption of raw and undercooked chicken handling of  
6 contaminated chicken has also been implicated.

7           MR. BURKHARDT: Then would you think products such  
8 as poultry rolls or turkey rolls or things like that are  
9 possible --

10          MS. RANSON: Generally, the heat lethality that is  
11 applied to those types of products, campylobacter is  
12 considered less heat resistant than salmonella. And as I  
13 say, if you look in the literature, there have been a couple  
14 of studies looking at ready-to-eat foods. And out of many,  
15 many samples, you don't see positives reported. So it just  
16 doesn't seem to be an issue with ready-to-eat foods.

17          MS. HANIGAN: The only issue that I have as far as  
18 trying to recommend, if you will, a performance standard at  
19 this time is, you know, we are still waiting for some  
20 performance standards under HACCP, if I am not mistaken,  
21 like incident level of salmonella in fresh sausage. I don't  
22 think I have seen it yet.

23          DR. HURLBERT: Is it fair to say that the agency  
24 is -- based on this slide that you showed us today, data  
25 available for setting a HACCP campylobacter performance

1 standard. So it is safe to say that the agency is already  
2 looking in that direction. Is that correct? I mean, the  
3 agency is already moving in that direction?

4 MS. RANSON: We are moving in that direction. But  
5 we're in an evaluation stage. And one of the reasons we set  
6 up this campylobacter baseline, the new baseline, was to  
7 prepare ourselves in case a decision was made to set a  
8 campylobacter performance standard. I have heard people say  
9 campylobacter is in the raw chicken, people are getting  
10 sick, we have to do something about it. So there are people  
11 saying that. And this is an idea that, well, perhaps what  
12 we need to do is get a performance standard for watching  
13 that.

14 MS. HANIGAN: I still seriously wonder, though, if  
15 we have, if you will, the cart ahead of the horse because I  
16 have concerns where this committee had sent this to the  
17 micro committee. Now if this meeting here was on June 5th  
18 and 6th, and we knew what the microbe committee would say, I  
19 would have a much better comfort level. That is the first  
20 concern I have.

21 Then the second concern I have is just if we set  
22 up a performance standard, and just for giggles and goofs we  
23 send those in on July 4th, it doesn't appear from what I  
24 heard that we have a methodology that can be rolled out into  
25 the industry, even if they wanted to do the testing.

1           Is that a correct assessment of what we heard?

2           MR. DENTON: That's correct. We not only have the  
3 methodology -- do not have the methodology in place in order  
4 to be able to do this in a consistent manner, we don't have  
5 the information that tells us where we even begin to think  
6 about setting a performance standard.

7           MS. HANIGAN: And that's my third point. Without  
8 this baseline, how do you do this?

9           MR. DENTON: You can't do it.

10          MS. SMITH-DeWAAL: But I don't believe that is  
11 what we are deciding. That is sort of the straw man. I  
12 mean, we're not deciding that we are going to have a  
13 performance standard in place July 5th of this year. That  
14 is just not realistic. The question, I think, before the  
15 committee -- the microbe committee is going to look at this.  
16 The issue is is this an important pathogen, which it  
17 clearly is. It is causing -- I mean, the illness data which  
18 I have for infections is 24.9 per 100,000, which is over ten  
19 more than salmonella is causing.

20          The sole food source that is implicated is  
21 poultry. And the agency is asking, you know, is this the  
22 right direction. We are considering a performance standard.  
23 You know, we still need the baselines. We are looking at  
24 whether it should be qualitative or quantitative, you know.  
25 We are asking the micro committee. But isn't this the

1 right direction?

2 And I think, as Dale said, the signal we need to  
3 send is, yes, it is the right direction.

4 DR. HURLBERT: Should we make a recommendation  
5 that we support the direction the agency is heading in  
6 evaluating methodology, evaluating what the numbers mean and  
7 putting it to -- because we can't really say yes or no until  
8 they evaluate their information. But we can support the  
9 direction they are heading.

10 MS. SMITH-DeWAAL: I think that would be helpful.

11 DR. HURLBERT: Because I don't know that we can do  
12 the role of the micro committee, but we can support their  
13 evaluation efforts.

14 MR. DENTON: We are about to assume part of their  
15 responsibility here.

16 DR. HURLBERT: Yeah.

17 MS. HANIGAN: I know I am not a microbiologist by  
18 schooling. So I really don't want to get into a discussion  
19 on the microbiology of the organism unless someone at the  
20 table is a microbiologist.

21 MS. SMITH-DeWAAL: Yeah. But I don't think that  
22 is what we have to do to support the direction the agency is  
23 going.

24 DR. HURLBERT: They have already said they are  
25 going to take it to the micro committee. We definitely

1 support that.

2 MS. HANIGAN: I agree with that.

3 DR. HURLBERT: We don't want to deal with that.  
4 We support that they are going to do the risk assessment.  
5 They are going ahead and gathering information, and they are  
6 trying to perfect methodology and then make the  
7 determination as to what is appropriate.

8 MS. SMITH-DeWAAL: And looking at a performance  
9 standard for campylobacter because it is a significant  
10 public health concern.

11 DR. HURLBERT: So if we say we support the  
12 direction the agency is heading, are we comfortable with  
13 that?

14 MS. HANIGAN: I am comfortable with that. Any --

15 MS. SMITH-DeWAAL: Well, I have a further point  
16 for discussion.

17 (Simultaneous discussion)

18 MS. AXTELL: I've tried to capture this. Is this  
19 adequate, just a quick note? You want to support the agency  
20 direction, continue evaluating a methodology, putting the  
21 baseline, taking the issue to the micro committee,  
22 determining the appropriate measure for performance.

23 MS. SMITH-DeWAAL: Which should include both  
24 qualitative and quantitative.

25 MR. DENTON: I don't know that we can say that

1 yet.

2 MS. AXTELL: Isn't that what the microbe committee  
3 is going to do?

4 MR. DENTON: That's what the microbe committee  
5 should be able to determine.

6 MS. HANIGAN: I think the performance standard --

7 MS. SMITH-DeWAAL: But we don't -- they are not  
8 going to have any better data than we do. I mean, we have  
9 already determined --

10 MR. DENTON: In that case, I think what we are  
11 talking about --

12 MS. SMITH-DeWAAL: -- that that question is --

13 MR. DENTON: -- quantitative, not qualitative.

14 DR. HURLBERT: Well, I don't even know if we want  
15 to go --

16 MR. DENTON: My understanding of microbiological  
17 issues -- and I have been involved in this to some extent  
18 all my career -- is that we would much better served with a  
19 quantitative --

20 MS. SMITH-DeWAAL: I understand.

21 MR. DENTON: -- assessment.

22 MS. SMITH-DeWAAL: But the data in front of us --

23 MR. DENTON: Based on what we know right now.

24 MS. SMITH-DeWAAL: Well, the data in front of us  
25 is inconclusive. Could we say determine the appropriate --

1 my concern is the word measure.

2 DR. HURLBERT: Yeah. I don't --

3 MS. SMITH-DeWAAL: Does that preclude anything?

4 DR. HURLBERT: Determine the appropriate measure  
5 for performance standard. Do we want to say assess --

6 MS. SMITH-DeWAAL: Assess all options.

7 DR. HURLBERT: Assess all options. And that way,  
8 you know, it may be that something new and better is going  
9 to come out next week, and we'll want to reevaluate. So I  
10 don't know who would want to box themselves in.

11 MS. AXTELL: So assess options for the measure to  
12 be used in the performance standard?

13 DR. HURLBERT: Or just say assess options for --  
14 related --

15 MS. AXTELL: For defining the performance  
16 standard.

17 DR. HURLBERT: For defining campylobacter based  
18 on -- it may come out that --

19 MS. SMITH-DeWAAL: The issue is whether what is  
20 technologically achievable versus what is the public health  
21 requirements. And, I mean, 88 percent shouldn't be --

22 MR. DENTON: Those are the same. It is  
23 technologically achievable. It should be consistent with  
24 what public health --

25 MS. SMITH-DeWAAL: Well, unfortunately, I mean,

1 sometimes they are not exactly the same. I mean, public  
2 health, from the standpoint of 015787 should be, you know,  
3 zero. We never see it. But the reality is sometimes it is  
4 not technologically achievable.

5 MR. DENTON: It is not technologically achievable.

6 MS. SMITH-DeWAAL: Right.

7 MR. DENTON: We're governed by what we have the  
8 ability to do.

9 DR. HURLBERT: Something about the risk assessment  
10 that we do support the agency direction on evaluating  
11 methodology, completing baselines, completing the risk  
12 assessment.

13 (Simultaneous discussion)

14 MR. DENTON: So anything that we could measure  
15 effectively, we ought to be able to set up a performance  
16 standard on it. On salmonella, we can't measure it but in  
17 20 percent of the samples because we are only going to get a  
18 20 percent recovery rate; 80 percent of them are going to be  
19 negative. So we are not gaining --

20 MS. HANIGAN: You know, we can't have sidebars  
21 going because we miss the conversation.

22 MS. SMITH-DeWAAL: Assess options for defining the  
23 campylobacter performance standard.

24 MS. HANIGAN: I have a question. I guess I am now  
25 confused. Is the microbe committee coming back on May 25th

1 and 26th? What was the direction given to them? Somebody  
2 that was on the committee last year, what are they supposed  
3 to be reporting back?

4 MS. SMITH-DeWAAL: Well, see -- and this the other  
5 issue I want to raise here. What I thought we were throwing  
6 to the microbe committee was the question on inspection  
7 models. The first time -- I mean, the performance standard  
8 issue is new, like all of these issues are. And so -- I  
9 mean, one of the things we can do is put questions to the  
10 microbe committee that would -- we are the policy committee.  
11 And so we need -- if we have scientific issues, which are  
12 strictly scientific, like, you know, get advice from the  
13 microbe committee on qualitative versus quantitative --

14 DR. HURLBERT: Then maybe that is what we need to  
15 put up here. After we say all this, then say, you know,  
16 microbe committee should evaluate information as to -- you  
17 know, and make recommendations to the policy committee,  
18 scientific recommendations to the policy committee.

19 MS. SMITH-DeWAAL: Right.

20 DR. HURLBERT: Maybe they'll come up with  
21 something, an independent organism for campylobacter that we  
22 don't know about. Maybe we don't need a campy performance  
23 standard, we need something else performance standard. So  
24 maybe we just say, you know, based on agency work here,  
25 the --

1 MS. SMITH-DeWAAL: Ask the microbe committee to  
2 report back to us. We can still -- the thing is, the  
3 microbe committee may report back and say we absolutely  
4 think the standard has to be done this way. We can still  
5 say -- I mean, you could say -- they could say, well, the  
6 right public health standard for campylobacter is zero. And  
7 we can say, gosh, that is not technologically achievable  
8 today. And so we support the salmonella -- the way they set  
9 the salmonella performance standard, which is based on  
10 prevalence.

11 So we may as a policy committee, even if the  
12 scientists come back and say this is our recommendation, we  
13 don't necessarily have to take it.

14 (Simultaneous discussion)

15 MS. HANIGAN: Okay, time out. We are going to  
16 take just 30 seconds. Alice, you need to reiterate what you  
17 said so Jeanne has it up there because I didn't write it all  
18 down. So, Alice, the floor is yours.

19 DR. HURLBERT: Okay. I think based on -- I think  
20 we can take assess options for defining campylobacter  
21 performance standards out, and we say, you know, we request  
22 that this issue be brought to the microbe committee with  
23 recommendations, science-based recommendations, to come to  
24 us.

25 MS. SMITH-DeWAAL: Why are we -- the problem is

1 there is no other place where we specifically support the  
2 fact that they are looking at a performance standard, and  
3 that is very important from my standpoint.

4 MS. HANIGAN: Yes, we did. We said we are  
5 supporting the agency's direction.

6 MS. SMITH-DeWAAL: On examining a performance  
7 standard for campylobacter. Is that right?

8 DR. HURLBERT: Well, let me -- I don't want to get  
9 in and -- hear me out first because I know -- you know, I  
10 kept thinking Mr. Billy has got to let you have the last  
11 word on campylobacter. We all just have to --

12 MS. SMITH-DeWAAL: No, he doesn't.

13 DR. HURLBERT: Based on this information --

14 MS. SMITH-DeWAAL: He wouldn't have set up a  
15 committee where I have the distinguished University of  
16 Arkansas, the turkey federation, and the industry chair. So  
17 if Mr. Billy wanted me to have the last word --

18 MS. HANIGAN: Excuse me. You know, I think that  
19 is uncalled for, okay?

20 MS. SMITH-DeWAAL: Okay.

21 MS. HANIGAN: Just excuse me for one minute.  
22 That's uncalled for. I am chairing the committee, and we  
23 are not going to get into that, okay?

24 MS. SMITH-DeWAAL: And that's fine.

25 MS. HANIGAN: All right.

1 DR. HURLBERT: But based on all of this  
2 information that we have --

3 MS. SMITH-DeWAAL: But it also -- it is absolutely  
4 not the case that Mr. Billy has set things up in any way  
5 that helps this issue from my standpoint. Yes. I'm sorry.

6 DR. HURLBERT: No. I think that if we -- if we  
7 say we support these moves, and then we'll let the advisory  
8 committee look at the science behind it, and then determine  
9 what -- right now, I don't feel comfortable saying maybe the  
10 campylobacter performance standard isn't what we need, maybe  
11 there is an indicator that would serve us better. If we are  
12 questioning prevalence versus numbers, maybe there is  
13 something that we don't know about. And to get to the  
14 campylobacter, we need to set a different standard.

15 I don't feel like I am qualified to say, you know.  
16 I would like for everybody to look at this information, and  
17 then get the Dr. Thompkins and the Danes and those guys to  
18 come back and tell me, okay, yeah, campylobacter is the  
19 thing, or no, you can get at it by looking at this, and we  
20 have a better methodology to get there, and we have better  
21 numbers on it.

22 MS. SMITH-DeWAAL: Alice, I believe that if that  
23 existed, we would know about it already. I mean, that's not  
24 realistic. We have a prevalence of 90 percent in turkeys.  
25 And that is not 1994 data. That is much more recent data.

1 This is a significant problem for your industry. I  
2 understand it is one you are struggling with. But the  
3 reality is that the agency is going in the right direction,  
4 and we said that.

5 DR. HURLBERT: That's what we said.

6 MS. SMITH-DeWAAL: Why don't we simply leave this  
7 assess options for defining campylobacter performance  
8 standards just the way it is, and then take the -- you know,  
9 take scientific issues to the national advisory committee  
10 for micro criteria.

11 DR. HURLBERT: And, Caroline, I believe that when  
12 they do their risk assessment, that is what they are going  
13 to find out. And, you know, yeah, everybody is struggling  
14 with campylobacter.

15 MS. SMITH-DeWAAL: Sure.

16 DR. HURLBERT: I'll admit it. But there may be  
17 another way to get at it if we are having this much  
18 confusion with the methodology and everything.

19 MS. SMITH-DeWAAL: It is not that confusing. I  
20 don't see where it is that confusing.

21 MS. HANIGAN: Okay, ladies. We have three minutes  
22 worth of general discussion yet.

23 DR. HURLBERT: Three minutes, three minute  
24 warning.

25 MS. HANIGAN: And Terry has said little on the

1 subject. And I would like your input as a member of the  
2 committee.

3 MR. BURKHARDT: Well, something like this, it  
4 seems to me, in my opinion, should be referred to the  
5 scientists to give us their best read on it. And that is  
6 what the microbe committee is.

7 MS. HANIGAN: When you say their best read on it,  
8 their best read as to --

9 MR. BURKHARDT: Regarding how it should be  
10 monitored, how it should be regulated. I agree with what we  
11 are saying here, that -- as far as supporting of the  
12 department's position to establish a performance standard  
13 for it because of the public health significance. I support  
14 that. But as far as the specifics of that and how that gets  
15 done, I believe the best people to deal with that is the  
16 micro committee.

17 MS. HANIGAN: Okay. One last go before we  
18 instruct Jeanne to get some type of conclusion drawn in the  
19 next 15 minutes on it. You have got the floor, 30 seconds.

20 MR. DENTON: To talk about --

21 MS. HANIGAN: Have you got any other general  
22 discussion on this?

23 MR. DENTON: I think this is probably the right  
24 way to go as far as supporting the agency direction and  
25 evaluating the methodology of the baseline risk assessment

1 information, taking the issue to the national advisory  
2 committee for their assessment of where we need to look at  
3 options for determination of the campy performance standard  
4 is the right way to go.

5           Probably looking at it as a scientist, I think the  
6 quantitative approach on this one is better than the  
7 prevalence, simply because of the fact that we can measure  
8 concentration on it. On salmonella performance standards,  
9 we couldn't measure concentrations and get a recovery rate  
10 time to make it a meaningful way to address it in a  
11 statistical processed control framework.

12           MS. HANIGAN: A question I have for you. I always  
13 think of the small producer, one of which I am not. But is  
14 the methodology that you folks are looking at, is that  
15 something that is relatively easy to do that small people  
16 could do it? And I understand food safety issues aren't a  
17 matter of if you are big or small and all that. But I think  
18 we do owe it to the little people to ask, too, is this  
19 method something they can do.

20           MS. RANSON: I guess it depends -- I guess they  
21 could be running a method in their own in-house laboratory  
22 versus sending it out to be tested. I guess anytime anyone  
23 is sending anything out to be tested, it is probably  
24 expensive.

25           MS. HANIGAN: I mean, like, with the generic E.

1 coli, they came up with an easy way of everybody could do  
2 this.

3 (Simultaneous discussion)

4 MS. SMITH-DeWAAL: The new testing methodology --  
5 I was talking to the gentleman who was sitting next to me  
6 who seemed to know a lot about it. I think he was from ARS.  
7 He said that it is cheap, it is fast, and it doesn't need  
8 humans to perform it well. So it sounds like -- he said  
9 that the media that they are using kills everything but  
10 campylobacter --

11 MS. RANSON: You must have been talking to Bill  
12 Haviland (phonetic).

13 DR. HURLBERT: But you have got to start using  
14 that, right? I mean, that is --

15 (Simultaneous discussion)

16 MS. HANIGAN: Whoa, excuse me. Jeanne, you are  
17 recognized. Go ahead.

18 MS. AXTELL: I just wanted to clarify, if you are  
19 talking about performance standard for campy like you are  
20 for salmonella, salmonella performance standard is an  
21 analysis that is done by FSIS and is used for the specific  
22 purpose of being able to determine industry compliance  
23 against the standard. So if you are talking about  
24 establishing a performance standard for campy like one for  
25 salmonella, the burden of testing is on the government.

1           If you are looking at the generic E. coli as a  
2 model, that is not a performance standard. That is a way of  
3 setting a requirement on industry to be able to do testing  
4 for purposes of gaining information to strengthen process  
5 control on slaughter operations.

6           MS. HANIGAN: Okay. Did you have --

7           MR. DENTON: I yield the balance of my time to the  
8 gentlewoman at the end of the table. That was my comment.

9           MS. HANIGAN: Well then, do you have anything else  
10 on it?

11           MS. SMITH-DeWAAL: I just am a little unclear.  
12 Issue to -- or, you know, this issue to NACMCF for  
13 assessment of options, so they should fully describe the  
14 options. Is that what we are asking for, that the NACMCF  
15 should fully describe the options and perhaps come back to a  
16 recommendation, not just say we support X, period? So we  
17 want them to describe --

18           MS. HANIGAN: They are the scientists.

19           MS. SMITH-DeWAAL: Yeah. So we want -- we're not  
20 -- I guess the question is just not for assessment. I am  
21 just making sure we have got the right words.

22           MS. HANIGAN: We want them to come back to this  
23 committee and say here is our recommendations.

24           MS. SMITH-DeWAAL: They should evaluate and  
25 recommend the -- or evaluate and make recommendations. Is

1 that right?

2 DR. HURLBERT: Based on agency actions.

3 MS. SMITH-DeWAAL: Based on -- yeah.

4 MS. HANIGAN: Okay.

5 MS. RANSON: The method is much easier. So it is  
6 an improvement. With training, people could get set up to  
7 run up if they so chose to run the method.

8 MS. SMITH-DeWAAL: But the burden is not on them.

9 MS. RANSON: Right.

10 MR. DENTON: It is not theirs --

11 DR. HURLBERT: Well, I don't want to -- but would  
12 we maybe want the committee to say where the burden should  
13 be? Should we look at it from as a criteria and the  
14 industry should be running it, or as -- I don't know. Is it  
15 set in stone that the performance standard is done by the  
16 government? That is something maybe these guys -- maybe it  
17 would be more beneficial for it to be a performance  
18 criteria, and industry do it. I don't know.

19 MS. SMITH-DeWAAL: Well, we can -- I mean, I mean,  
20 we're going to get another bite at this apple. So I'd say  
21 -- I mean, that is something we should discuss.

22 DR. HURLBERT: Well, that's where I kind of want  
23 to leave it, where they come back and say, okay, we looked  
24 at these options, instead of kind of focusing in is this our  
25 only option. I know you think I am just doing it to protect

1 my turkeys.

2 MS. SMITH-DeWAAL: No.

3 DR. HURLBERT: I am a little bit. But  
4 realistically --

5 MS. SMITH-DeWAAL: Well, and that is your job.  
6 The question is I think that's an interesting question. I  
7 think also the issue I raised earlier of, you know, what if  
8 the -- what if we get the infectious dose and it is a level  
9 that is simply unachievable. This committee may have to  
10 come back and say gosh, you know, this is what is  
11 technologically achievable. That is where the performance  
12 standard should be, even though it is above the public  
13 health standard.

14 So I think those kinds of issues should be  
15 reserved for -- and we are going to get another bite at this  
16 apple.

17 DR. HURLBERT: One more thing. I do think that it  
18 should be if we need to -- maybe we don't need to put it up  
19 now. But do we have to stay here, Jeanne, where in the past  
20 they have let some companies, if you will, if you are doing  
21 your own monitoring programs, that you are -- I don't want  
22 to say --

23 MS. AXTELL: That becomes a debate in the policy  
24 arena as to --

25 DR. HURLBERT: Okay. We won't --

1 MS. AXTELL: -- how the implementation and options  
2 are --

3 (Simultaneous discussion)

4 DR. HURLBERT: Yeah. The agency is --

5 MS. HANIGAN: Excuse me, ladies.

6 DR. HURLBERT: I'm sorry.

7 MR. DENTON: One quick comment. It was mentioned  
8 earlier about the large and the small companies having  
9 laboratory capabilities. But in some cases, small and very  
10 small do not have their own individual laboratory  
11 capability, so it is going to be an issue in which they are  
12 going to have to contract this to somebody's external lab.

13 MS. SMITH-DeWAAL: But that's the voluntary --

14 MR. DENTON: It is a cost issue.

15 MS. SMITH-DeWAAL: It is voluntary.

16 MR. DENTON: If they choose to follow the  
17 campylobacter. And most companies are going to run their  
18 own in tandem with what the FSIS group is doing.

19 MS. HANIGAN: Okay. Alice.

20 DR. HURLBERT: Well, my last comment, and I  
21 promise I'll hush now. We have a performance standard for  
22 zero tolerance in cooked product, and we have been letting  
23 the agency run the samples. And, you know, we are hearing  
24 now that that is not -- the industry needs to be doing more,  
25 and that is one reason why I want to be sure we leave all

1 options open because if it is just an agency sample and we  
2 continue to have problems, are we as industry still going to  
3 be bashed for -- you know, we have got to do something  
4 different. And maybe these guys can come back and say this  
5 is what everybody should be doing to get the end result.

6 MS. SMITH-DeWAAL: I think though that that  
7 reflects the fact that this industry for a long time didn't  
8 use any microtesting. And, you know, it is a hard change to  
9 make. But it is in retooling the industry, microtesting is  
10 part of that. So I know you are at this point. The legal  
11 requirement here, which Jeanne has outlined for us, is one  
12 where the agency does the testing. And, yeah, you may feel  
13 pressured to do it. Many companies will want to do it. I  
14 want them to do it. But the reality is that is not the  
15 legal requirement here.

16 So I just think we should -- you know, I am  
17 comfortable with this. It is not as strong as I would like.

18 MS. HANIGAN: But we will have a second shot at it  
19 in November.

20 MS. SMITH-DeWAAL: We will.

21 MS. HANIGAN: Okay. We need to clean up the -- if  
22 we bring back the chart --

23 MS. SMITH-DeWAAL: Oh, I have one more thing on  
24 campylobacter.

25 MS. HANIGAN: Just a minute. If we bring that

1 chart to them tomorrow, they'll think we're crazy, so --

2 MS. SMITH-DeWAAL: Will they type it? I think  
3 these guys --

4 MS. AXTELL: He is calling --

5 MS. HANIGAN: Okay. But let's -- from the top,  
6 let's go through, Jeanne, what you understand we wrote.  
7 Caroline, I'll still give you your last -- you know, but  
8 let's make sure that we have got it for the record what we  
9 are presenting back tomorrow.

10 MS. AXTELL: Okay. In terms of the discussion  
11 that was held up front, the points of clarification, and  
12 that was revising of at least certain of the tables. The  
13 subcommittee is acknowledging that the data is incomplete  
14 and to conclude that campy prevalence -- that the data is  
15 incomplete to conclude that campy prevalence could not be  
16 used, but it appears unlikely to be useful as a measure of  
17 performance standard.

18 There was a discussion about the risk assessment,  
19 that it is in the planning stages. It would look at sources  
20 of the farm to table continuum, intervention placement, and  
21 risk assessment issues.

22 A performance standard -- the next discussion  
23 point was the performance standard could and perhaps should  
24 proceed ahead of the risk assessment. Those were not  
25 sequentially linked but could be handled independently.

1           The subcommittee -- and I don't know how you want  
2 to phrase this. Do you want to conclude, resolve, whatever,  
3 to support the agency's direction to establish a campy  
4 performance standard, to proceed with evaluating  
5 methodology, completing the baseline, initiating risk  
6 assessment, and taking the issue to the NACMCF to evaluate  
7 and recommend options for defining the campy performance  
8 standard, in other words, to deal with both quantitative  
9 versus qualitative.

10           MS. HANIGAN: Can we clean up that last one,  
11 committee, by just saying let NACMCF evaluate and recommend,  
12 instead of saying --

13           MS. SMITH-DeWAAL: Well, are they -- we want to  
14 look at it again, though, right?

15           MS. HANIGAN: Right.

16           MS. SMITH-DeWAAL: So it is to us.

17           MS. HANIGAN: Right. Recommend back to our  
18 committee?

19           MS. SMITH-DeWAAL: Right.

20           MS. HANIGAN: I just don't like take issue to.  
21 That take issue just sounds a little wordy.

22           DR. HURLBERT: So we're going to say support  
23 agency direction to establish campy performance standard?

24           MS. AXTELL: With the understanding that this  
25 is --

1 DR. HURLBERT: We're not going to let that be  
2 discussion at the micro committee. Our recommendation is we  
3 do this, and then what do we do in --

4 MS. AXTELL: I think the question or the issue  
5 that has been on the table earlier was the issue of there  
6 being a performance standard. It doesn't mean that the  
7 conclusion has been that it be a regulatory performance  
8 standard versus performance criteria. I think that is a  
9 subsequent --

10 DR. HURLBERT: That's an evaluation. We are  
11 asking for recommendations. We support the agency  
12 direction, and we are asking for recommendations on the  
13 establishment of a campy by the micro committee. Is that --

14 MS. HANIGAN: Yes.

15 DR. HURLBERT: Does that clean it up so we don't  
16 have the issue --

17 MS. SMITH-DeWAAL: Say that -- no. What do --  
18 we're not changing. Are you just clarifying what you  
19 understand it to say?

20 DR. HURLBERT: Well, I thought I was helping clean  
21 up words. But evidently I am causing confusion.

22 MS. HANIGAN: Go one more time at, Alice. Go  
23 slow, though.

24 DR. HURLBERT: Okay. I was -- support agency  
25 direction, what we have listed here, and request an

1 evaluation and a recommendation back from those guys, all  
2 those letters, on the establishment of campy something,  
3 whether we put performance standard, you know, in  
4 parentheses or whatever. But let the advisory committee  
5 make the initial recommendation, and that way we will get  
6 our prevalence or numbers or, da, da, da, you know,  
7 infection dosage, the whole works, based on this  
8 information.

9 I just want to be sure we get some kind of  
10 recommendation back from them that has evaluated this  
11 scientific information.

12 MS. SMITH-DeWAAL: I think that we're -- we -- I  
13 mean, Dale supported a performance standard. I support a  
14 performance -- I support the language that is up there. The  
15 agency direction to establish a performance standard doesn't  
16 mean it is going to happen tomorrow. We have discussed  
17 that. It also is coming back to us so that we can look at  
18 alternatives. But I really would object to taking that out  
19 of the -- I mean, that is really the question that was put  
20 to us. And it is really a public -- I mean, it is an  
21 important public health decision that we just need to make.

22 DR. HURLBERT: Oh, yeah. I agree totally.

23 MS. SMITH-DeWAAL: And the scientists will get  
24 back to us.

25 DR. HURLBERT: I'm not -- I don't think we are

1 disagreeing. I think it is just a matter of the wording.  
2 And I feel like we are getting in a box because this is the  
3 way we have always viewed performance standards. And we  
4 know that from the zero tolerance in cooked products that  
5 performance standards with agency testing -- you know, we  
6 are being told now that is not enough. So if we do  
7 performance standard, you know, we're -- I just wonder if we  
8 are boxed up based on HACCP and the zero tolerance issues  
9 that we have been on, if we're -- but I won't --

10 MS. HANIGAN: You prefer if it left the option or  
11 performance criteria, either/or? Is that what you are  
12 recommending, Alice? I guess you have lost me there.

13 DR. HURLBERT: Well, I don't know that I have a  
14 wording recommendation. But I think the agency's direction  
15 right now is to look at -- do something with campylobacter.  
16 Totally agree -- we do something with campylobacter?

17 MS. SMITH-DeWAAL: It looked like a performance  
18 standard to me.

19 DR. HURLBERT: Well, and that is what the agency  
20 says they are doing. So when we say we support their  
21 direction --

22 MS. SMITH-DeWAAL: To establish a campylobacter  
23 performance standard.

24 DR. HURLBERT: Well, we want the committee to  
25 evaluate. I mean, that's --

1 MR. DENTON: Or to -- yeah.

2 MS. SMITH-DeWAAL: Well, and they are going to  
3 recommend back. I just -- I think that that is an important  
4 statement.

5 DR. HURLBERT: Okay. I mean, Caroline, nobody is  
6 saying campylobacter isn't important and that we need to do  
7 something with it. But are we getting into the whole  
8 mindset of this is the only way to handle it?

9 MS. SMITH-DeWAAL: I don't think so.

10 DR. HURLBERT: And, you know, later on we are  
11 going to say, well, you know, industry hasn't done their  
12 testing, and da, da, da. But I will just -- I will hush  
13 now.

14 MS. HANIGAN: But I do -- okay. I do agree. But  
15 I am not a scientist. I don't mean to offend you. I  
16 understand that everyone has got their own backgrounds and  
17 stuff. But the one thing I want to make sure of is that we  
18 don't shut the door on the micro committee, that they can  
19 come up with some other option, whatever it is. It is fine  
20 with me, you know, if it is still going to give us the same  
21 end result. That is what we have always talked about. And  
22 I think that needs to -- it needs to leave the door open for  
23 those scientists, because that is what they are, to tell us  
24 if there is something else here.

25 MS. SMITH-DeWAAL: Okay.

1 MS. HANIGAN: Go ahead.

2 MR. DENTON: Should we -- I am looking at where it  
3 is. I think what is hanging everybody is the word  
4 "establish." We support the agency direction to consider  
5 campy performance standards with regard to evaluating the  
6 methodology, the baseline risk assessment, and then request  
7 their evaluation with regard to options for doing that.  
8 Should we take the word "establish" and put it "consider,"  
9 switch it to "consider," I mean?

10 MS. SMITH-DeWAAL: Well, the other thing I was  
11 thinking -- and let me just throw these out so we are  
12 considering them at the same time -- is options, where we  
13 say request NACMCF to evaluate and recommend back to us the  
14 options -- and then in parentheses or alternatives.

15 DR. HURLBERT: Okay.

16 MS. HANIGAN: That's fine.

17 DR. HURLBERT: Because I --

18 MS. SMITH-DeWAAL: That's a big step for me.

19 MS. HANIGAN: Why don't we do --

20 MS. SMITH-DeWAAL: But I wouldn't change the other  
21 wording.

22 (Simultaneous discussion)

23 MS. HANIGAN: Can we either get this up with this,  
24 or this down with this so that we are not split here and  
25 there? That is what I don't like about it. We have got

1 here and there. Let's either put this up here, or this down  
2 here. I don't care how we do it. We have got three  
3 minutes.

4 MS. SMITH-DeWAAL: Well, why don't we do two --  
5 make one support agency direction to establish campy, and  
6 underneath that have those three items. And then number  
7 two, request NACMCF. That would put those two at the same  
8 -- you know, give them the same weight. And then the  
9 problem is the evaluate methodology, complete baselines,  
10 initiate risk assessment is all directions that the agency  
11 is taking. And then number two can be -- does that work?

12 MS. HANIGAN: It works for me.

13 DR. HURLBERT: Where did you put your options one  
14 more time?

15 MS. HANIGAN: In the bottom.

16 MS. SMITH-DeWAAL: Options or alternatives.

17 DR. HURLBERT: To support agency direction to  
18 establish campylobacter performance standards or options  
19 that are --

20 MS. SMITH-DeWAAL: For -- yeah. Options, and then  
21 in parentheses, or alternatives.

22 MS. HANIGAN: That is why those two need to be  
23 tied together, Jeanne. That campy --

24 MS. SMITH-DeWAAL: It is one and two, right?

25 MS. HANIGAN: Yeah. It is got to be tied

1 together.

2 MR. DENTON: Why don't we start on a fresh page?

3 MS. SMITH-DeWAAL: Because we don't have time.

4 MS. AXTELL: Do you guys want to work -- I mean, I  
5 think you have the sense of where the subcommittee wants to  
6 go.

7 (Simultaneous discussion)

8 MS. HANIGAN: Okay. Question from the -- do you  
9 have a question?

10 MR. COOK: Maybe we need to write it down.

11 MS. HANIGAN: How we want it, right?

12 MR. COOK: Right, yeah. I mean, I'm not quite  
13 sure that --

14 MS. HANIGAN: Here, I'll tell you how --

15 MS. SMITH-DeWAAL: Why don't you just put "and  
16 two," just after initiating risk assessment, comma, "and  
17 two," and that ties them together, right? Because then the  
18 next thing that you are going to leave -- I guess I am  
19 trying to give them equal --

20 MS. HANIGAN: Jeanne, would you read the request  
21 micro -- what --

22 (Simultaneous discussion)

23 MS. HANIGAN: That's a good suggestion. Get  
24 another page, please. We have two minutes.

25 DR. HURLBERT: How about support agency direction

1 to establish campylobacter performance standard, options or  
2 alternatives, and then you come down --

3 (Simultaneous discussion)

4 DR. HURLBERT: Committee asks the advisory  
5 committee to make recommendations based on agency  
6 information.

7 MS. SMITH-DeWAAL: No. I really -- I really feel  
8 like we have it down to here, right there. And then we need  
9 to figure out how to couch this, request NACMCF to evaluate  
10 and recommend back to NACMPI the options or alternatives for  
11 defining the campylobacter performance standards. That's  
12 the way it reads, request NACMCF to evaluate and recommend  
13 back to NACMPI --

14 MS. HANIGAN: I have a recommendation. My  
15 recommendation would be as follows: support the agency  
16 direction to (1) evaluate methodology, (2) complete the  
17 baseline, (3) initiate the risk assessment --

18 MS. SMITH-DeWAAL: No. I really --

19 MS. HANIGAN: Excuse me. I have the floor. I do  
20 have the floor. (4) Request the microbe committee to  
21 evaluate and recommend back to this committee options for or  
22 alternatives for defining the performance standard, et  
23 cetera, and tie it together. We're not tied together the  
24 way it is up there. It has got to get tied together.

25 MS. SMITH-DeWAAL: I really disagree that -- I

1 mean, I think we -- that is exactly where Alice and I have  
2 just spent 20 minutes debating.

3 MS. HANIGAN: Okay.

4 MS. SMITH-DeWAAL: And it is just -- you know, for  
5 you to come in at this point and say we are going to change  
6 the wording. I mean, we had agreed on this wording. The  
7 only question is how to tie it together with plan so that  
8 the two had equal weight. And I thought we did that.

9 MS. HANIGAN: Fine. It is 8 o'clock. That is  
10 staying up there until 9 o'clock. We are moving on, moving  
11 on. And one can look at it and decide. We are moving on.

12 The next issue that we were asked to address --  
13 and I hope that works for the people that are doing  
14 recording -- is -- Jeanne, I guess this puts you on. We'll  
15 run it much the same way. The first 15 minutes, if you have  
16 any questions regarding the background information that was  
17 presented, please direct them towards Jeanne. And we are on  
18 tab 6. We'll try again for discussion for half an hour  
19 until quarter to 9:00. And then at 9 o'clock, we will  
20 conclude. And then we will have to come back to the other  
21 issue.

22 Does anyone have questions for Jeanne regarding --  
23 we are moving on to qualifications of FSIS inspectors.  
24 Background --

25 MS. SMITH-DeWAAL: I do. I was confused. It

1     seemed like the base requirements for GS 1862 are less  
2     stringent than the baseline for GS 1863.  And I was just  
3     confused because 1863, all they do is inspect food.  I mean,  
4     they do the organoleptic issues.  And yet the way it is -- I  
5     just sort of thought that GS requirements would have been  
6     more versed in terms of --

7             MS. AXTELL:  They -- I think one way to look at  
8     this in terms of the OPM requirements, Caroline, is that on  
9     1863, our entry level is GS-5.  If you go to the 1862  
10    column, go down to GS-5, and you will find that they are  
11    comparable.

12            MS. SMITH-DeWAAL:  So in doing organoleptic  
13    inspection of meat, you mean --

14            MS. AXTELL:  We start with pork with the 1863  
15    series, and we hire at the GS-5 level, okay?  The first  
16    thing you see in the 1863 column is the grade 5 description,  
17    basic requirements for entry.  If you go to the 1862  
18    column --

19            MS. SMITH-DeWAAL:  Oh, where you require a high  
20    school education?

21            MS. AXTELL:  No, no.  Go to the cross thing, go  
22    down to grade 5, under 1862.  Under 1862, at the five level,  
23    you are looking at very comparable kinds of experience.  You  
24    are looking at one year of specialized, comparable to the  
25    four, or successful completion of a full four-year course of

1 study leading to a bachelor degree with major study or at  
2 least 24 semester hours in any combination of courses  
3 described above.

4 MS. SMITH-DeWAAL: It just seems odd that we don't  
5 have more --

6 MS. AXTELL: Well, these are not within -- agency  
7 controlled. These are actually established by the Office of  
8 Personnel Management in government for application and use  
9 in government law. The same with the classification  
10 descriptions that are on the other handout. So what we are  
11 -- the question that is put before the committee is given  
12 this set of qualifications between these three series on the  
13 qualifications chart, since we can make some decisions when  
14 we eventually want to introduce the 696 series, among -- we  
15 can make some choices among these educational backgrounds,  
16 what advice would the committee suggest that the agency  
17 consider in making decisions where they have some discretion  
18 in that arena?

19 MS. HANIGAN: I have even a more basic --

20 MS. AXTELL: Yeah. Katie mentioned to me that you  
21 wanted to maybe go back to the basic split on the job  
22 series.

23 MS. HANIGAN: Yeah. And I guess my questions are  
24 so basic, and maybe it is kind of "wow you", but I  
25 understand that we are working with the union -- I

1 appreciate that -- and that basically they were guaranteed  
2 that they would have a job, but they may need to relocate or  
3 have additional schooling, right?

4 MS. AXTELL: We basically tried to indicate that  
5 -- we are trying to send the message that we have an  
6 interest in retaining the workforce that we have.

7 MS. HANIGAN: And I think that is important.

8 MS. AXTELL: And we are looking at a long-term  
9 transition that will take several years to accomplish. And  
10 so in effect we are relying on normal attrition, normal  
11 replacement hirings for a lot of it. But we know that we  
12 have a core of people within the workforce that already  
13 possess the qualifications to move into the new series. And  
14 we have people that may be very close to possessing those  
15 qualifications.

16 MS. HANIGAN: Right.

17 MS. AXTELL: So we want to be able to do things  
18 that would send the message that we are interested in  
19 retaining that workforce. We will hope those that  
20 understand that they may have to do some things themselves  
21 to prepare for a different career path.

22 MS. HANIGAN: See, I just still have concerns  
23 because of my practical, everyday experiences of -- even if  
24 you have people -- you are going to have people that are  
25 extremely book smart, if you will, okay? But where the

1 rubber hits the road, they just -- they still don't  
2 understand it. So I guess when I look at these  
3 qualifications or classifications, the changes you are  
4 making, I still am not sure what the government safety  
5 inspector does and what this -- or consumer safety inspector  
6 does, and what the consumer safety officer does. I still --  
7 I don't understand it, how they differ, why there would be  
8 this education difference. I don't understand that.

9 MS. AXTELL: Let me see if I can sort of walk  
10 through this.

11 MS. HANIGAN: Okay.

12 MS. AXTELL: I am going to leave the veterinarians  
13 out of the mix.

14 MS. HANIGAN: Okay.

15 MS. AXTELL: For the time being. Pardon to all  
16 those that are, because this is really -- this is really  
17 about changing -- this is really about principally changing  
18 the food inspection occupation, food inspector segment of  
19 the workforce. Pre-HACCP, they are all 1863s, okay,  
20 regardless of whether they are doing slaughter, processing,  
21 combination, what. They are all 1863s.

22 MS. HANIGAN: Okay.

23 MS. AXTELL: We introduced HACCP in '98, and we  
24 changed work procedures. So one of the things that you do  
25 when you change work procedures in the government personnel

1 system, you send some classifiers out to review what the  
2 introduction of this new work has done in terms of changing  
3 the job the way the job was constructed before. And in the  
4 government system, there is always a difference between the  
5 job requirement and how the person performs in the job.

6 Ideally, you have a job requirement, and the  
7 person you put in it fully performs in the manner in which  
8 you expect. But I would acknowledge, as all of you will  
9 acknowledge, sometimes the two don't match. But here, I am  
10 talking about job description. We introduce HACCP. We need  
11 to go out and -- we did go out. And the question was asked  
12 this afternoon, how many reviews were done.

13 The reviews were done in 48 plants, 24 were  
14 slaughter combination, meaning there is both slaughter and  
15 processing work performed in the plants, 24 were pure  
16 processing. 144 interviews for actual classification  
17 reviews were done of inspection positions in those 48  
18 plants. Based on those classification reviews, the work was  
19 now sufficiently different from work that was traditionally  
20 classified in the 1862 -- 1863 series that it no longer  
21 seemed appropriate to leave them here.

22 So the question now became what series do you put  
23 them in. At the same time that this was going on, the  
24 agency began to think about down the road in the future,  
25 given an environment in which we have all HACCP in place, a

1 HACCP inspection models project is completed, and we are in  
2 that post environment, then whatever else comes after HAACP,  
3 what is the nature of the workforce of the future that we  
4 need. And we started looking at what some of the  
5 characteristics were of occupational series that the agency  
6 might consider targeting for that workforce of the future.

7           We did look at food science and food technology.  
8 And the question was raised this afternoon, you know, why  
9 didn't you just settle there. And I mentioned the fact that  
10 696 allowed us to draw on other disciplines. Another item I  
11 did not mention but is also a part of this is that the way  
12 OPM describes the 1382 food technology series, they decide  
13 -- they describe it as a series principally involved in work  
14 associated with the production of food, whereas this series  
15 talks about the regulation or the enforcement of the  
16 regulation of foods as more as the principal focus of the  
17 job, whereas the food technologists are described as more  
18 associated with work that needs to consider production  
19 issues associated with food.

20           So we still see that we may have food  
21 technologists in the agency, perhaps in some of the staff,  
22 perhaps in the tech center, perhaps in headquarters, doing  
23 various development work where the principal knowledge they  
24 need to bring to the table is knowledge about food  
25 production practices. But this series, in the food arena --

1 and this is also used in other commodity arenas. It isn't  
2 exclusively used for food regulation. But the focus of this  
3 series is the regulation and enforcement of regulation over  
4 various products, among which are food and food products.

5 Caroline.

6 MS. SMITH-DeWAAL: I have some familiarity with  
7 how the FDA inspection model works, which gives me some  
8 amount of concern. While I want to support the direction  
9 you are going, I also note that under this series 696, they  
10 also are doing investigations of consumer illnesses,  
11 injuries, or deaths, compliance -- I mean, they do -- and  
12 what we found at FDA, actually, is when you asked them how  
13 many food safety inspections -- how many plant inspections  
14 they are doing a year per inspector, the number is tiny  
15 because they are so busy running off doing everything else.

16 I mean, they literally end up not focused on inspection  
17 nearly as much as your inspectors are.

18 So I just want to share that concern with the  
19 agency and with the committee, that, you know, while I have  
20 some trepidation that we are going to end up with -- if you  
21 follow the FDA model too closely, we are going to end up  
22 with people never in the plant.

23 MS. AXTELL: Well, the other thing I would just  
24 say, that in considering the workforce of the future, we are  
25 not looking at an occupational selection out of context with

1 the overall statutory framework that we operate within and  
2 the requirements for all the settled understandings about  
3 inspections and slaughter and in processing, daily  
4 inspection and processing.

5 MS. HANIGAN: Okay. Two real basic questions.  
6 And I agree with Caroline's position. It seems to me like  
7 we are moving in this direction, and we are not addressing  
8 it, we are moving there. We are addressing the backgrounds  
9 here, right, is what has been posed, the academic  
10 backgrounds?

11 MS. AXTELL: Yes. Could I have two more  
12 minutes --

13 MS. HANIGAN: Yes.

14 MS. AXTELL: -- to finish this? And maybe then  
15 your question might focus a little. At the same time we are  
16 doing this assessment of what the impact of introducing  
17 HACCP has had to the work at the in-plant level, we have  
18 been thinking about where we might head in the future. So  
19 in thinking about what series would we want to classify the  
20 work here today, we wanted to meet the two objectives, one  
21 being that we found a series that acknowledged that the work  
22 in fact was different than the work that was being done  
23 before so that we could, by putting people in a different  
24 series, be formerly acknowledging the difference in the  
25 work.

1           But we also want the existing workforce to be the  
2 nucleus of the transition to the future so it needed to be a  
3 series that the workforce could come into. But it also  
4 needed to be a series that we could use as a wedge since you  
5 can't go from here to here in one fell swoop. It is going  
6 to take several years. You need a series that you can use  
7 to bridge. That is why we were looking at the 1862 consumer  
8 safety inspector series, because like the 1863, principally  
9 the work here is technician oriented work so that from a  
10 qualifications standpoint, people that are qualified here  
11 would be qualified here.

12           We could support the grade structure that we have  
13 here, meaning that when we reclassified, we are not talking  
14 about promoting at the same time. We are talking about if  
15 you did reclassify their job, the reclassification is for  
16 1863 to 1862, and their same grade is supported. So there  
17 are nine today here, there are nine today here.

18           MS. HANIGAN: So everybody -- 1863s would be no  
19 more? They all automatically move?

20           MS. AXTELL: No. And that's where I need to do a  
21 little bit of bridging here. There is also the HACCP models  
22 project, and there is the smarter pilot, and there is the  
23 end distribution pilot. While this general implementation  
24 has been going on, and while we have been looking at what we  
25 might do down the road in the future, we have had the HACCP

1 models project. But this is only involved with certain  
2 market classes with respect to the slaughter component,  
3 using your young poultry, both chickens and turkeys, market  
4 hogs, steers and heifers.

5           For this work, and in the work, the development  
6 work, that has been done on this initiative, we looked at  
7 the duties that we would be assigning to these jobs in the  
8 pilot. And that work is built in large measure off a lot of  
9 work methodologies we're doing in HACCP jobs today so that  
10 these jobs can be classified to the 1862 series also. But  
11 because this project only touches with respect to slaughter,  
12 those jobs in those market classes, jobs in those plants  
13 with those market classes, we still have and would have,  
14 even after HACCP in very small plants is completed -- those  
15 slaughter positions that are in plants that are dealing with  
16 older animals, their work has not changed. And they would  
17 still be in the 1863 series.

18           So that is why we're saying that we see that over  
19 the next few years we are likely to have people in all three  
20 occupational series in the workforce that once was all that,  
21 that this -- we're still looking at what types of jobs in  
22 the in-plant environment have the greatest demand for the  
23 application of scientific and professional judgment in  
24 making regulatory determinations about the adequacy of HACCP  
25 systems. And we haven't defined the universe of those jobs

1 yet.

2           But that's the -- those are the kinds of jobs that  
3 we would be looking at, where the places -- where the nature  
4 of what is going on in the plant by virtue of the  
5 technologies, the production processes, the nature of the  
6 HACCP systems in place really call for the regulatory  
7 official being in that plant to be exercising a greater  
8 degree of scientific and professional judgment. And those  
9 would be the locations where we would anticipate being able  
10 to put 696 jobs in place.

11           MS. HANIGAN: Okay. And my question this  
12 afternoon, why I had concerns, we have 12 plants. And  
13 clearly -- I mean, not to throw darts at the agency. But  
14 there are some inspectors are out there that would classify  
15 for this 1862 based on the job functions they are doing. I  
16 think they are in over their heads. I don't think they get  
17 what we are trying to do, where when they are part of my  
18 organization, I have the ability to say you clearly don't  
19 understand the HACCP system here. You are part of a problem  
20 team. We are moving you to a different job somewhere.

21           And that is what concerned me this afternoon when  
22 I saw you bringing this up. I thought people could move  
23 from 1863 to 1862 based on the job they are doing right now.  
24 But how do you know if they really ever understand the whole  
25 principle of HACCP, and are they really following what the

1 company is doing and making sure the company is doing what  
2 is in the HACCP program? Or are they just kind of going  
3 through the motions? That is my concern when I saw this.

4 MS. AXTELL: Okay.

5 MS. HANIGAN: Because you can't get them back, you  
6 know what I mean? When you are dealing with the union, once  
7 you -- in my experience, once you classify someone as 1862,  
8 I hate to try to go back and classify them as 1863 and tell  
9 them you never understood it to start with, we should have  
10 never moved you up. That's where I was, like, this July  
11 thing was kind of --

12 MS. AXTELL: Okay. Again, we are talking about --  
13 for purposes of --

14 MS. HANIGAN: Because they are not accountable.

15 MS. AXTELL: Okay. And that may be a separate  
16 issue, too.

17 MS. HANIGAN: Okay, yeah. I don't want to go  
18 there.

19 MS. AXTELL: Yeah. For purposes of July 1, we are  
20 looking at off-line HACCP jobs in large plants and small --  
21 the very smallest would follow in January. Now just as we  
22 did some reviews in large plants after we implemented HACCP  
23 in large, we are getting set to go out and do some, probably  
24 a more limited number of visits, but some visits in some of  
25 the small plants that just came under HACCP to make sure

1 that the kind of criteria that we are looking at here are  
2 equally applicable to the small industry environment, and  
3 make sure that there aren't some other characteristics that  
4 we need to consider in small before we confirm that  
5 decision. But that is what we are looking at.

6 Now that is saying the nature of the job has  
7 changed. Katie, that is not saying that the person who  
8 encumbers the job has got it.

9 MR. HUSSAIN: I have permission to ask some  
10 questions. What you just said.

11 MS. HANIGAN: Are you with the agency?

12 MR. HUSSAIN: Yes, ma'am.

13 MS. HANIGAN: Okay.

14 MR. HUSSAIN: I work for Jeanne. We are working  
15 on this consumer safety 696 issue. But you made a statement  
16 just a moment ago that the inspector, whether it is an 1862  
17 or 1863, really doesn't understand what you are doing here  
18 with HACCP. That is exactly what we are trying to have in  
19 number 696. But we want to bring better educated people  
20 with better understanding of HACCP, and not the inspector  
21 that we have today.

22 To accomplish that, we are asking you a question  
23 today. That was the question I think was posed, what  
24 qualifications these people should possess in  
25 696 -- positive and right.

1 MS. HANIGAN: But only for 696.

2 MS. AXTELL: Only for 696.

3 MR. HUSSAIN: Yes, ma'am. 1862 is just a  
4 foundation, as Jeanne said. We have not changed the people.  
5 We have not changed their training either. They are given  
6 HACCP training.

7 MS. AXTELL: We did give them HACCP training. But  
8 what we are talking about is when we introduced 696, the  
9 people involved in 696 will have a different work  
10 methodology. It will be a professional work methodology,  
11 like how they go about making regulatory determinations and  
12 looking at the adequacy of the HACCP system. So we are  
13 saying when we start looking at in-service placement among  
14 this population of people, and we have several hundred  
15 people with four-year degrees in these kinds of disciplines  
16 that OPM would allow, we will have some discretion available  
17 to us about how liberally or how conservatively we evaluate  
18 academic backgrounds from these fields.

19 And that is the specific question we wanted to ask  
20 the committee, for the committee's advice. We could be very  
21 liberal and say anybody with any one of these degrees that  
22 are academic fields that are referenced could be considered  
23 as qualifying. Or we could say no. And our thinking right  
24 now is we need to pare away some of this, but keep the  
25 specialties that are more directly related to the work of

1 the agency, and that secondarily we have the question about  
2 statistics.

3 MS. HANIGAN: We'll start with Caroline, and then  
4 we are going to go around the table. You're next.

5 MS. SMITH-DeWAAL: I'll start.

6 MR. DENTON: I'm ready.

7 MS. SMITH-DeWAAL: I wouldn't mind -- and I am  
8 just throwing these out. But I wouldn't mind striking  
9 pharmacy, nutrition. Should we strike the vets?  
10 Engineering -- you know, maybe -- I mean, there are things  
11 here that clearly do not relate to what we need these people  
12 to do. So that would be my contribution. Other people can  
13 throw in the hat on others.

14 MS. HANIGAN: Jim?

15 MR. DENTON: In looking at this, I am struck by  
16 two issues. One is the background part of it. I think  
17 there is a good mix of backgrounds there with regard to  
18 biological sciences, chemistry, physical sciences, food  
19 technology. You took exception to medical sciences?

20 MS. SMITH-DeWAAL: No. I --

21 MR. DENTON: Or nutrition?

22 MS. SMITH-DeWAAL: Nutrition.

23 MR. DENTON: Okay.

24 MS. SMITH-DeWAAL: And engineering and pharmacy,  
25 right, when needed.

1           MR. DENTON: I wrote down four that I know in our  
2 own program would have people that could be qualified to do  
3 this because of the nature of what they -- one would be food  
4 science degrees, one in animal science degrees with the  
5 processing option, one in poultry science with the  
6 processing option. And I also wrote down  
7 biological/agricultural engineering only because we have  
8 biological engineering incorporated into our program that is  
9 the agricultural engineering part of the College of  
10 Agriculture Food and Life Sciences.

11           Each of these has got a pretty strong background  
12 in the biological sciences, and a good strong background  
13 that we require in our programs and in these four  
14 disciplines. I know that we require the statistical course  
15 work that is part of what is there. The statistical  
16 process, the statistical part of this, there was a question  
17 I think posed down in the lower half of this, a question  
18 with regard to whether or not that would be something that  
19 would be picked up with work experience. Without  
20 statistics, it is going to be nearly impossible --

21           MS. HANIGAN: Difficult.

22           MR. DENTON: -- for someone to understand  
23 statistical process control. I firmly believe that the  
24 course work has to be there in statistics. Now once that is  
25 done, then maybe they can through the experience pick up the

1 rest of it. But you can't bypass statistics and expect to  
2 pick it up with experience.

3 MS. HANIGAN: Since we are going around the table,  
4 my feedback to you, Jeanne, would be I hate to have you be  
5 real specific, and I hate to have it be real broad. And I  
6 think you people have some very qualified people out in the  
7 field right now, and I commend you for trying to put this  
8 together. And I would hate to rule out some of your  
9 qualified people you have in the field now that have  
10 actually been out in the plants working saying you are not  
11 eligible for GS 696 because you lack statistics way back 20  
12 or 30 or 40 years when you went to school.

13 I think there must be some kind of an option here  
14 as to getting some education for these people. But I would  
15 much prefer if the agency was middle of the road than way to  
16 specific or way to lean as far as what you have outlined.  
17 And I don't disagree with Caroline. I would be a little  
18 concerned if I had someone with nutrition or pharmacy  
19 running around. I would kind of wonder about those. I  
20 really would.

21 But I do think we use SPC daily in our operation.

22 And I think if you don't understand, it is terrible hard to  
23 try to explain something like that if they don't have any  
24 feel for it at all.

25 MS. SMITH-DeWAAL: Is there a companion to poultry

1 science in the area?

2 MR. DENTON: Yes, animal science.

3 MS. HANIGAN: Animal science.

4 (Simultaneous discussion)

5 MS. HANIGAN: The one thing you need to realize,  
6 though, if you put in with processing option, don't rule out  
7 some of the people you have in your field right now that may  
8 have been an animal science, food science, poultry  
9 science --

10 MR. DENTON: Precisely.

11 MS. HANIGAN: -- degree, what, 10 or 12 years ago  
12 when they first came into your agency. So we don't want to  
13 be ruling those people that you already have in the field  
14 because they don't have that processing option. Experience  
15 should count somewhere for those people.

16 MS. AXTELL: Yeah. And we do have some people  
17 that are -- about 23 to 25 percent of the people hired in  
18 the last few years have had full four-year degrees in any of  
19 these disciplines. What I don't know is whether those  
20 degrees had processing options. And by virtue of our  
21 standard hiring practices, which you are hired as a five and  
22 you go on the slaughter floor -- not on the floor, it is on  
23 the line -- and you are there for years until you promote  
24 out of it, they wouldn't have had the opportunity to gain  
25 any experience on that side.

1 MS. HANIGAN: Okay. Terry, we need your thoughts,  
2 please.

3 MR. BURKHARDT: I'm very impressed with what you  
4 are trying to do here. I think you have recognized the need  
5 to move more toward a science-based inspector with more of a  
6 science background, and you are transitioning into it. I  
7 guess, you know, I see the 696 as more of an evaluative role  
8 in evaluating effectiveness of HACCP plans in the future.

9 In regard to the degrees, you know, basic public  
10 health degree I think is one that we could add. You  
11 mentioned micro. There is a degree called sanitary science.  
12 I think that has a lot of applicability for this, public  
13 health backgrounds. And as far as the -- as far as --

14 MS. AXTELL: I'm sorry. A general --

15 MR. BURKHARDT: Sanitary science.

16 MS. AXTELL: Sanitary science, okay.

17 MR. BURKHARDT: And you had mentioned the  
18 microbiologists. That probably goes without saying. But as  
19 far as the statistical process control, I believe that my  
20 recommendation would be that the agency can provide that for  
21 the people in those positions. I believe they do that now.

22 There is a statistical process class that is taught at  
23 College Station, but as and how it applies to the work that  
24 they do. And you make it real specific.

25 So I would say that the agency could be charged

1 with providing that for their employees and not required up  
2 front before they hired with degrees.

3 MS. HANIGAN: Okay. Alice.

4 DR. HURLBERT: I looked at it a little differently  
5 than looking at, okay, we have a chemist here, we have  
6 someone who majored in pharmacology, someone who majored in  
7 biology, and looking at from a standpoint of you are going  
8 to have new people coming in, and you are going to have the  
9 old guard here. Would it be appropriate to say okay, let's  
10 take everybody's resume, everybody's transcript, whatever  
11 you want to call it, and look and see, right? Do they have  
12 a microbiology course? Do they have some sort of  
13 statistical process control? Have they done anything on  
14 interpersonal skills, you know, communication because that  
15 is a big part of what goes on out in the plant, you know.

16 Having been in the circuit, bless their heart,  
17 there are some people that math was just -- they couldn't do  
18 it, you know. Should we look to see that they have had some  
19 sort of training, not -- maybe they got it at Texas A&M from  
20 the training center. Maybe they got it three years of  
21 experience. But instead of -- I mean, we could have a  
22 Christian education major from the little small school I  
23 came from that had six hours of microbiology, four hours  
24 here, da, da, da, that might be perfect. But, you know, I  
25 don't know that we should be ruling people out strictly

1 because of their looking more at their academic background  
2 or their experience instead of -- this makes it look like  
3 they are looking strictly at okay, what is your degree in,  
4 and if that, we are kicking you out.

5 MS. AXTELL: Okay. Let me just clarify. Where  
6 the bold or is there on the qualified, if they don't have a  
7 degree, where they have a degree in another field, in one of  
8 these academic fields, if they can make up a combination of  
9 30 semester hours and education or experience back in those  
10 academic fields, then they could be considered qualified.

11 DR. HURLBERT: Okay.

12 MS. AXTELL: So your person perhaps who had a  
13 degree in another area, but maybe decided that they wanted  
14 to go into this field and went back and got a certain number  
15 of credit hours in this mix of disciplines would also be  
16 considered as meeting basic quals.

17 DR. HURLBERT: But should we -- do we as a  
18 committee want to recommend the discipline or recommend  
19 specific -- I know in the AMI document you talk about six  
20 hours of microbiology, so much of this, so much of that. Do  
21 we want to look more at specific course requirements that we  
22 would recommend, as opposed to the discipline? Evidently, I  
23 am not getting this across.

24 MS. HANIGAN: No. I understand what you are  
25 saying.

1 DR. HURLBERT: Do we want to kind of outline --

2 MR. DENTON: Specify what the hours are.

3 DR. HURLBERT: Well, maybe not specify the hours,  
4 but say they need to have a micro, they need to have  
5 statistical process control, they need to have this, this,  
6 this, you know.

7 MS. AXTELL: If I could just share --

8 MS. HANIGAN: Yes, go ahead.

9 MS. AXTELL: -- from our experience, when we  
10 attempted to introduce the food technology series several  
11 years ago, at one time we were trying to maintain a list of  
12 course work that we considered qualifying course work that  
13 people could take. And we found that that became very, very  
14 difficult because universities and colleges around the  
15 country sometimes use very similar titles, but the curricula  
16 in fact varied. And we began to experience some  
17 difficulties in being able to keep that current and know  
18 that a class from a particular university in fact meant what  
19 we thought it meant and that the person taking it was  
20 acquiring the knowledge that we thought.

21 And it was our experience in that that is kind of  
22 leading us to consider more of a middle of the road  
23 approach. Rather than targeting specific courses, broad  
24 areas of course work, like say microbiology, as opposed to,  
25 you know, a particular --

1 DR. HURLBERT: Would you not have the same thing  
2 hold true no matter what? Because if you have a broad area,  
3 the broad microbiologist, it would be different at a  
4 different location as to what kind of training you would  
5 get. And like we said with the food tech, the courses you  
6 outlined, there was no consistency between what was being  
7 taught --

8 MS. AXTELL: We were trying to keep up an actual  
9 list of courses. And the more narrow you get, the more  
10 difficult it is to keep that current and to be able to  
11 evaluate the knowledge acquired for any given set of  
12 applications that you are trying to evaluate.

13 MS. HANIGAN: It seems to me, though -- you are  
14 from Arkansas, right?

15 MR. DENTON: Uh-huh.

16 MS. HANIGAN: That what you have outlined up  
17 there, they would have microbiology course work in what you  
18 have outlined there, poultry science, animal science, food  
19 science, and the sanitation science. Would there not be  
20 general micro in there?

21 MR. DENTON: Yes.

22 MS. SMITH-DeWAAL: But isn't -- what we have here  
23 is 30 semester hours, including biological sciences,  
24 chemistry, physical science, food technology, medical  
25 science, epidemiology, and then those things. I mean, I

1 thought we were creating -- and correct me if I am wrong --  
2 but a laundry list of types of courses, types of thinking  
3 people would have done, including statistical, which we all  
4 think is important. Or -- and then it has this combination  
5 of 30 semester hours plus experience and education.

6 But I thought we were creating a laundry list of  
7 these are the kinds of courses, including the ones up there  
8 and some of the ones that are here.

9 MS. HANIGAN: And you are right. They  
10 specifically ask us to address which particular disciplines  
11 and academic background. So let's focus on that, particular  
12 disciplines, academic backgrounds so that we have --

13 MS. SMITH-DeWAAL: The right thinkers.

14 MS. HANIGAN: Yes.

15 MS. SMITH-DeWAAL: I mean, we want people who can  
16 think the right way --

17 MS. HANIGAN: Does anybody at the subcommittee  
18 disagree that they need to have some type of statistics/SPC,  
19 either schooling provided from you or from the agency? Is  
20 there any disagreement that they have to have some type of  
21 SPC, whether it is provided through academics or through the  
22 agency? Is that -- do we feel that is important as a  
23 committee? Okay.

24 MR. DENTON: Yes.

25 MS. HANIGAN: We have got one agreement point.

1 MS. SMITH-DeWAAL: And the computer programming  
2 piece of that, is that relevant, or should we strike that?

3 MS. HANIGAN: Well, I don't call it computer  
4 programming. But they have to know how to --

5 MR. DENTON: Computer applications really.

6 MS. HANIGAN: Computer applications.

7 (Simultaneous discussion)

8 MS. SMITH-DeWAAL: Eight hours statistics or  
9 computer -- and computer programming. I mean, do we believe  
10 that statistics, period --

11 DR. HURLBERT: Yes.

12 MS. SMITH-DeWAAL: And then computer help -- you  
13 know, computer knowledge beneficial?

14 DR. HURLBERT: Basic computer skills.

15 MR. DENTON: Right.

16 MS. SMITH-DeWAAL: So strike computers and  
17 computer programming.

18 MR. DENTON: One quick comment. I may have given  
19 a wrong impression about statistics in the existing  
20 workforce. I don't know that everyone that is in place at  
21 FSIS right now that has a good biological background  
22 couldn't pick up one course in statistics and be right  
23 there.

24 MS. HANIGAN: Yeah.

25 MR. DENTON: Now how they do that is --

1 MS. HANIGAN: Up to them.

2 MR. DENTON: -- at the agency's discretion or at  
3 their discretion because I agree with what you are saying.  
4 There are some awfully good scientists out there in the  
5 biological sciences that may lack that one piece of the  
6 puzzle. And that will allow them to go on up into that next  
7 category.

8 We think of it in two ways. One is the product  
9 that we are trying to turn out right now, which is our young  
10 people. They are in the academic environment. And we also  
11 have the continuing education part of it because we are  
12 located so closely to the industry. We get a lot of those  
13 folks coming back in and picking up one course at a time,  
14 those things they think are important to them.

15 MS. HANIGAN: Okay. And we're in agreement that  
16 computer application, we'll leave that up to the agency. I  
17 mean, we don't need computer programmers, but they need to  
18 know how to basically get around in a computer, send  
19 e-mails, look up stuff, et cetera.

20 MR. DENTON: Uh-huh.

21 MS. HANIGAN: Okay. Now we have got to get more  
22 specific.

23 MS. AXTELL: But not computer programming as a  
24 degree background.

25 MR. DENTON: No.

1 MS. HANIGAN: Not as a requirement.

2 DR. HURLBERT: Maybe I am still lost. But do we  
3 want to put microbiology up there, or are we just assuming  
4 in these disciplines it is there?

5 MS. HANIGAN: We're going there right now. We  
6 want particular disciplines, so let's go back to the list  
7 that she gave us her.

8 MS. SMITH-DeWAAL: Biological sciences include  
9 micro?

10 MR. DENTON: Yes.

11 MS. HANIGAN: Why don't you put biological  
12 sciences, okay? Agree to that one.

13 MS. SMITH-DeWAAL: Chemistry as well?

14 MR. DENTON: Yes.

15 MS. HANIGAN: Yeah. I don't have a problem with  
16 chemistry. Pharmacy -- Terry, you are not voting. Are you  
17 yea, nay?

18 MR. BURKHARDT: No. I -- on chemistry, or  
19 pharmacy? I don't think pharmacy is -- I was just thinking  
20 of chemistry. My boss is a chemist, so I guess I have never  
21 seen that.

22 (Laughter)

23 DR. HURLBERT: For the record --

24 MS. HANIGAN: Pharmacy --

25 MR. DENTON: Let the record reflect --

1 (Laughter)

2 MS. HANIGAN: Pharmacy, hello. No. Pharmacy is  
3 out. Okay. Physical sciences?

4 MS. SMITH-DeWAAL: What all physical sciences?  
5 Geology?

6 MR. DENTON: Yeah.

7 MS. HANIGAN: Give us another physical science.

8 MR. DENTON: Physical chemistry. I mean, it gets  
9 off away from the biological part of it.

10 DR. HURLBERT: Yeah. Analytical and --

11 MS. HANIGAN: Should we strike that? Or is it the  
12 right kind of thinking?

13 MR. DENTON: It is the right kind of thinking, I  
14 think.

15 MS. HANIGAN: It is?

16 DR. HURLBERT: But it doesn't necessarily imply  
17 any type of micro background whatsoever.

18 MR. DENTON: Right. But we are going to list  
19 that.

20 DR. HURLBERT: Okay. We are going to list that  
21 separate. I think I am catching on. Maybe, maybe not.

22 MS. HANIGAN: So physical sciences are in or out?  
23 What does the committee --

24 MR. DENTON: I think there are good scientists  
25 working --

1 MS. HANIGAN: That's fine. We're relying --

2 MR. DENTON: Analytical thinking.

3 MS. HANIGAN: Okay. Food technology is an obvious  
4 yes.

5 MR. DENTON: Absolutely.

6 MS. HANIGAN: Nutrition?

7 MR. DENTON: That's tough.

8 MS. SMITH-DeWAAL: I mean, it is the right kind of  
9 thinking, isn't it?

10 MR. DENTON: Yeah.

11 MS. SMITH-DeWAAL: I mean, these aren't  
12 necessarily majors. These are just the different types of  
13 courses that could apply. I think we probably have to  
14 include it, even though it is not --

15 DR. HURLBERT: It is on line with physical  
16 science.

17 MS. HANIGAN: Is medical science in the right  
18 area?

19 DR. HURLBERT: Sure.

20 MS. SMITH-DeWAAL: Yeah.

21 MR. DENTON: Yeah.

22 MS. HANIGAN: Engineering?

23 MR. DENTON: I think engineering, if it is  
24 agricultural, or biological and agricultural engineering.

25 MS. HANIGAN: And I think the rest of them are

1 pretty well in, aren't they?

2 MS. SMITH-DeWAAL: Yeah.

3 MS. HANIGAN: And then we want to specify  
4 regarding micro. Alice, do you have a recommendation as do  
5 we want to --

6 DR. HURLBERT: I don't know if we want to get so  
7 detailed as to specify hours. But I think we do need to say  
8 they have some background in micro.

9 MR. BURKHARDT: I agree.

10 MR. DENTON: Did we get the food science, animal  
11 science, poultry science part? Or was that on the prior  
12 page?

13 MS. AXTELL: That was on the prior page, but we  
14 can bring it forward.

15 MS. HANIGAN: Poultry -- animal science, poultry  
16 science. You had sanitary --

17 MR. BURKHARDT: Sanitary science.

18 MR. DENTON: Sanitary science, right.

19 DR. HURLBERT: Why don't we block out pharmacy  
20 now. When we -- if you think about thinking, and we are  
21 going to require these additional courses --

22 MS. SMITH-DeWAAL: If we require the additional  
23 courses, my concern is you'll end up with someone who  
24 majored in --

25 DR. HURLBERT: Yeah.

1 MS. SMITH-DeWAAL: But that would go for geology  
2 as well.

3 DR. HURLBERT: Yeah. If we are including these  
4 courses --

5 MS. SMITH-DeWAAL: All right. Pharmacy is back  
6 in.

7 DR. HURLBERT: Because that would be more of a  
8 chemistry --

9 MS. HANIGAN: Pharmacy is the only one we struck  
10 from our entire list.

11 MS. SMITH-DeWAAL: Yeah.

12 MS. HANIGAN: So our recommendation is that they  
13 have course work in micro. Is that right?

14 DR. HURLBERT: In micro. We said statistical --  
15 some sort of statistical process control.

16 MS. AXTELL: But I thought I heard you saying that  
17 could be either in their academic --

18 MS. HANIGAN: Yes.

19 MS. AXTELL: -- or it could be obtained post  
20 employment.

21 MS. HANIGAN: You're right, yeah.

22 DR. HURLBERT: And then computer application?

23 MS. AXTELL: But you recommend that we look at --  
24 that micro be in everybody? Or look for micro?

25 DR. HURLBERT: Yeah.

1 MR. DENTON: Yeah.

2 DR. HURLBERT: The emphasis should be on --

3 MS. HANIGAN: You are a college professor?

4 MR. DENTON: Yes.

5 MS. HANIGAN: Can they obtain the micro  
6 information they need if they went back to school at night  
7 and took a micro course? I don't know what they would  
8 learn --

9 MR. DENTON: They would at least learn the  
10 fundamentals involved in microbiology with regard to the  
11 nutrient requirements, temperature, conditions, those sorts  
12 of things.

13 MR. BURKHARDT: There are foodborne disease  
14 courses that will give you the basics.

15 MR. DENTON: Yeah. There are food microbiology  
16 courses that may be more appropriate than a more classic  
17 micro course. But I think that all of them are going to  
18 have some very fundamental value to someone who is being  
19 required to look at food microbiology.

20 MS. HANIGAN: Then why can't we put the micro  
21 right along with her statistics, that it can either be  
22 academic or postemployment?

23 DR. HURLBERT: Because you actually offer micro  
24 courses at Texas A&M for those guys, don't you?

25 MS. AXTELL: Well, and the food safety education

1 program that they are running right now that does have some  
2 CEUs -- yeah, CEUs attached to it. It does have some basic  
3 micro taught in it.

4 MR. HUSSAIN: It even has a micro major and  
5 statistical process control emphasis.

6 MS. HANIGAN: Okay. We have got like --

7 DR. HURLBERT: Wait a minute. What about -- I am  
8 getting back to interpersonal skills.

9 MS. HANIGAN: Well, we weren't asked to address  
10 that here. That is -- I am hoping we are going to be able  
11 to bring back to the committee that we want the rest of this  
12 document brought up, the rest of that execution, task force  
13 execution, because how do you measure interpersonal schools  
14 in -- see, they specifically asked us about the academics.

15 I don't disagree with you, Alice, at all. But  
16 that's not what they asked us to do.

17 DR. HURLBERT: No. I think you need some sort of  
18 academic or some type of written and oral communication --  
19 help me out. What am I trying to say here?

20 MR. DENTON: There are two or three ways of going  
21 about that. We have in our basic plan for all majors, that  
22 we have four different options in my program.  
23 Communication, speech communication, is a required class.  
24 As part of all of our course work, we require written and  
25 oral communication as part of their laboratory exercise and

1 some of their course requirements.

2 I think, as I understood what you were getting at  
3 before, there are some interpersonal skills that some course  
4 work in the college of business sometimes deals with that,  
5 you know, team building.

6 DR. HURLBERT: Dealing with people issues.

7 MR. DENTON: Yeah. It is primarily a -- and they  
8 also do some of it in the psychology department.

9 DR. HURLBERT: Because I had nothing like that in  
10 school until I started working for the agency. It is pretty  
11 hard to put people out with this kind of responsibility if  
12 they don't --

13 MS. HANIGAN: Well, you know, I think that we're  
14 getting -- we have taken our -- to way too specific then.  
15 You know, I think clearly the candidates need to demonstrate  
16 good written and oral communication skills. But I think  
17 that can be done fairly easy. During an interview, you have  
18 them bring something that they have written or write you  
19 something there. But, boy, is it going to get specific if  
20 we have to put that in.

21 DR. HURLBERT: Well, right now it is not a  
22 requirement that when you are -- short of the -- being able  
23 to fill out one of the applications, I guess, is written  
24 proof enough that you have written skills. But right now in  
25 the agency, there is nothing that -- they don't evaluate

1 anything that is written. They don't -- isn't that correct,  
2 Jeanne?

3 MS. AXTELL: Well, I think there is a difference  
4 between looking at basic qualifications for an occupation  
5 versus issues like written and oral communications, which we  
6 can also specify each person who is going for a promotion,  
7 applying for a job as a promotion. We can specify other  
8 skill requirements and evaluate those on a case by case  
9 basis.

10 MS. HANIGAN: It just seems to -- what you have  
11 outlined here is a GS-7, 9, or 11. When you talk about one  
12 year graduate level, two year graduate level education,  
13 those folks at that level have to be able to write in order  
14 to be at that level of education. I mean, if not, they must  
15 be having somebody else do the writing for them.

16 (Laughter)

17 MR. DENTON: Don't want to think about that.

18 MS. HANIGAN: But a lot of those higher education  
19 levels require a thesis and different types of papers to be  
20 turned in. What does the committee think, interpersonal  
21 skills or not? Go ahead.

22 MR. BURKHARDT: Well, I would think that somehow  
23 that relates to the quality of how well you do your job.  
24 You know, we might have the best scientific mind, but if it  
25 can't talk to the plant operator, they are not going to be

1 effective in their job. I think that the agency does do  
2 some work with their employees in regard to interpersonal  
3 skills, being able to communicate. Isn't there some courses  
4 that are available that provide it?

5 MR. HUSSAIN: We do provide supervisors the  
6 training in that area.

7 MR. BURKHARDT: Supervisors. But what about the  
8 inspectors?

9 MR. HUSSAIN: The basic training includes a lot of  
10 supervision. In addition, it would be part of the CSO  
11 training course.

12 MR. BURKHARDT: I agree that that is very, very  
13 important, to have that -- to have the science, but being  
14 able to communicate with the people you are dealing with is  
15 very, important. But I believe that the agency can provide  
16 that where it is needed. It should be able to with their  
17 staff.

18 MS. HANIGAN: Okay. We have got like seven  
19 minutes.

20 MS. SMITH-DeWAAL: I have one question, zoology.  
21 I am just going back to look at the current requirements for  
22 1863 to allow zoology. I think that's the -- and other  
23 appropriate agriculture subjects. Is there -- I'm just  
24 wondering, in terms of meshing it with your current  
25 requirements for the agency. Is there a reason why we are

1 not including zoology? I mean, is there -- does the agency  
2 have --

3 MR. DENTON: Zoology is a term that we used to use  
4 for biological sciences that had to do with things of animal  
5 origin, but it has now been swept up into the term  
6 biological sciences for the most part. So I think that  
7 that --

8 MS. SMITH-DeWAAL: It is included?

9 MR. DENTON: It is included in that.

10 MS. HANIGAN: Okay. We have got our list. I just  
11 need a yea or nay on interpersonal skills. And we have got  
12 to go back to campy in the last five minutes. So what are  
13 we doing on interpersonal skills? Alice, if you feel  
14 strongly about it, get some words in.

15 DR. HURLBERT: I feel very strongly about it. But  
16 -- you know, because, nothing personal, but we can all sit  
17 here and cite examples where we have inspectors out in the  
18 field that we feel should have some better people skills.

19 MS. HANIGAN: Okay. So do you want -- give us  
20 some wording. Demonstrate --

21 DR. HURLBERT: Well, I'm not sure it is a full  
22 committee consensus on whether we do that.

23 MR. DENTON: The longer I think about this, the  
24 more I think you're right. It almost could make or break  
25 the success of a person in this position because of the

1 communication that they are going to have to have with the  
2 plant.

3 MS. HANIGAN: Okay. That's fine. Caroline, do  
4 you have a problem with interpersonal skills?

5 MS. SMITH-DeWAAL: No.

6 MS. HANIGAN: Terry?

7 MR. BURKHARDT: No.

8 MS. SMITH-DeWAAL: I don't think I do, do I?

9 MS. HANIGAN: Alice, give us some wording.

10 DR. HURLBERT: Well, what -- because these guys  
11 may be out doing the interviews of victims, the way this  
12 thing reads on the next page, so you have got to have  
13 somebody that can -- yeah, instead of just --

14 MS. AXTELL: May I make a suggestion?

15 MS. HANIGAN: Uh-huh.

16 MS. AXTELL: Because I am not a personnelist, but  
17 I am concerned that we may be potentially treading into an  
18 area that is beyond what we could consider as part of the  
19 qualifications for the occupation. I would be comfortable  
20 if the sense of the subcommittee was to say to the agency  
21 that the agency needed to consider how it evaluated  
22 applicants to the agency and internal candidates in terms of  
23 interpersonal relations skills, that that is an important  
24 area that the agency needs to find a way to evaluate both on  
25 new hires and on internal applicants.

1 MS. HANIGAN: Fair enough. I have -- I agree with  
2 that. Agree? Okay. Very good. Did we give you your  
3 direction?

4 MS. AXTELL: Yes, you did. Yes, you did, and I  
5 appreciate it very much.

6 MS. HANIGAN: Now we have four and a half minutes.  
7 Alice and Caroline, did you guys --

8 DR. HURLBERT: No. I sent her another note.

9 MS. HANIGAN: Okay.

10 MS. SMITH-DeWAAL: Yeah. Which is on a different  
11 subject. So we need --

12 MS. HANIGAN: We are on this subject only.

13 MS. SMITH-DeWAAL: I know. So what I -- I have  
14 done some thorough thinking while we have been having this  
15 other discussion. And I would like to make one suggested  
16 change, and I would like to respond to one of Alice's  
17 points. I don't think it should be an alternative because  
18 we want them to consider both the performance standards, the  
19 options for performance standards, and alternatives to those  
20 options. We want both. We don't want them just to consider  
21 one or the other. So that is my recommendation.

22 On the issue of performance criteria which you  
23 raised, you know, we have got to leave this wide open  
24 because we may need performance criteria. Performance  
25 criteria are used in one circumstance, and that is generic

1 E. coli. Generic E. coli is not pathogenic. There are  
2 specific strains that are, but no generic. Any place where  
3 we have a pathogen so far, like E. coli 015787, listeria,  
4 salmonella, the agency has used a performance standard.

5           So I don't think -- I really don't think at this  
6 point from a public health standpoint that is the right  
7 direction, or we need to leave that door open. We have got  
8 real strong evidence. And further, I just want to emphasize  
9 that, you know, we all need to go back and explain whatever  
10 happens here to our constituents.

11           The public health data on this is irrefutable. It  
12 is causing tremendously more illnesses even than salmonella.

13           And we have groups like the American Association of Retired  
14 Persons, the Consumer Federation of America, National  
15 Consumers League, Public Voice for Food and Health Policy,  
16 American Public Health Association, Safe Tables Our Priority  
17 -- Nancy Donley is here -- and Consumers Union have all  
18 endorsed the agency moving in this direction. And I just  
19 don't see how as a subcommittee we can come out with a  
20 recommendation that doesn't support the clear public health  
21 direction that we need to be going.

22           DR. HURLBERT: Caroline --

23           MS. HANIGAN: Okay. You have the last comment.

24           And then we are going to this worksheet, and then the two of  
25 you can stay for hours afterwards. Fair enough? Okay.

1 DR. HURLBERT: Caroline, I have no issue with the  
2 public health. But what my concern is are we boxed in on  
3 the word performance standard performance criteria? We have  
4 a performance standard for zero tolerance in cooked product  
5 right now. It means the agency is doing the testing. But  
6 we are hearing from everybody that is not appropriate. You  
7 guys should be doing the -- you guys as industry should be  
8 doing the testing. And, you know, maybe we should. So  
9 maybe performance standard isn't the right word.

10 I'm not disagreeing with you at all about public  
11 health, the significance. We all have to do something about  
12 campylobacter. Is using the word performance standard --  
13 you and I know what the discussions were here. When it goes  
14 to the National Advisory Committee, is it going to mean  
15 performance standard, oops, let's think about it, like we  
16 all have been thinking about it. But --

17 MS. SMITH-DeWAAL: But we have addressed that  
18 concern in length.

19 DR. HURLBERT: Based on the HACCP rules. And  
20 maybe -- and we know with our experience from what the exact  
21 groups you are reading, that you don't like the way we do  
22 performance standards in cooked product, that you think the  
23 company should. But the way we all, because of what is  
24 happening now, focus on performance standard, it is an  
25 agency thing.

1           Now is the microbe committee going to know the  
2 difference? I want to make it clear that we have ongoing --

3           MS. SMITH-DeWAAL: I'll call Dave personally.

4           DR. HURLBERT: I'm going back -- well, I mean,  
5 that's the thing. But it needs to be real clear for our  
6 recommendations.

7           MS. HANIGAN: Okay, okay. That's it. Jeanne, I  
8 need your expertise for a minute. Does this language box us  
9 in?

10          DR. HURLBERT: Wait a minute, Katie. I want to be  
11 sure that I go on the record that I am going back to the  
12 turkey guys, and I am telling them, which we all know that  
13 we do understand and we are doing something on  
14 campylobacter, and I don't -- yes, I am responsible for the  
15 National Turkey Federation. But, yes, we all agree that we  
16 have an issue with campylobacter. And I don't think anybody  
17 sitting in this -- at this table because of our lack of a  
18 micro background can be sure what direction it should go.

19          Now I just want to be sure that I am not quoted as  
20 saying I disagree that there is any type -- I don't want to  
21 do public health.

22          MS. HANIGAN: I don't think anybody in the  
23 committee would. So, okay. Jeanne, does this box us in,  
24 the language here?

25          MS. AXTELL: I don't think it does, as long as the

1 subcommittee articulates how they understand the language.

2 MS. SMITH-DeWAAL: And we have asked for options  
3 and alternatives.

4 MS. AXTELL: Gerri, what do you think?

5 MS. RANSON: I think Caroline's addition of  
6 options and alternatives really covers all of the bases.

7 DR. HURLBERT: Options -- I don't have a problem.  
8 I just want to be sure I am quoted correctly as what is  
9 being said.

10 MS. HANIGAN: Okay. Let's see what he has got  
11 because this poor fellow has been more than tolerant. Okay.  
12 This is what he has got. Developments in our program: data  
13 is incomplete to conclude that campylobacter prevalence  
14 could not be used to establish a performance standard, i.e.,  
15 current data appear unlikely to be useful. Okay. Second  
16 point being, risk assessment is in the planning stages to  
17 evaluate (1) sources along the farm to table, (2)  
18 intervention placement, (3) infectious dose.

19 Okay. Then we have the conversation about  
20 performance standards should proceed ahead of risk  
21 assessment. And what that was we were saying in salmonella  
22 -- Caroline brought this up. In salmonella, they had set  
23 performance standards ahead of having the risk assessment  
24 done. That was their relation to salmonella. Then here is  
25 the subcommittee. The subcommittee supports the agency's

1 direction to establish campylobacter performance standards  
2 and (1) evaluate methodology, (2) complete the baseline  
3 study, (3) request the microbe committee evaluate and  
4 recommend back to this committee the options and  
5 alternatives for defining campylobacter performance  
6 standards, that is, quantitative versus qualitative.

7 Jim, yes or no?

8 MR. DENTON: I think that is what we said.

9 MS. HANIGAN: Okay. Terry?

10 MR. BURKHARDT: Fine with me.

11 MS. HANIGAN: Alice?

12 DR. HURLBERT: In your support direction to  
13 establish campylobacter standards -- Caroline, you said  
14 options and/or alternatives, or --

15 MS. SMITH-DeWAAL: And alternatives.

16 MS. HANIGAN: And.

17 MS. SMITH-DeWAAL: So they have to give us both.

18 DR. HURLBERT: So that is the first thing that  
19 we're supporting, is those that look at something with  
20 campylobacter.

21 (Simultaneous discussion)

22 MS. HANIGAN: Let me go -- okay. This is the key  
23 part of it. Subcommittee supports the agency's direction to  
24 establish campylobacter performance standard and (1)  
25 evaluate the methodology, (2) is complete the baseline

1 study, (3) is request the microbe committee evaluate and  
2 recommend back to this committee options or alternatives for  
3 defining campylobacter performance standards. And in  
4 parentheses, he put that is quantitative versus qualitative.

5 DR. HURLBERT: No. I don't think that is what we  
6 said.

7 MR. DENTON: That's not what we said, and.

8 DR. HURLBERT: But I'm not going to fight about  
9 it.

10 MS. SMITH-DeWAAL: Did they have initiating risk  
11 assessment in there?

12 MS. HANIGAN: This is up above. See, this is --

13 DR. HURLBERT: We don't have captured in the first  
14 statement what we have on the paper.

15 MS. HANIGAN: That's the third -- that's the  
16 bottom statement.

17 MS. SMITH-DeWAAL: Yeah. I -- did you get this,  
18 initiating risk assessment?

19 MS. HANIGAN: Yeah. Up at the --

20 MS. SMITH-DeWAAL: Because this should be one, and  
21 the next should be two. And then three is initiating risk  
22 assessment and -- okay? You missed that.

23 MR. COOK: Risk assessment and --

24 MS. SMITH-DeWAAL: And then two --

25 MR. COOK: Is requested --

1 MS. SMITH-DeWAAL: Or this piece -- we request  
2 that NACMCF should be at the same level as this. So in  
3 other words, they are equal.

4 DR. HURLBERT: Well, what my --

5 MS. SMITH-DeWAAL: This is all one thing that we  
6 are saying, and then this is the separate.

7 DR. HURLBERT: Okay. But the first sentence that  
8 we have, support agency direction to establish performance  
9 standard, and then we start listing. And I think we should  
10 put performance standards and your word -- I can't -- or  
11 options based on evaluation methodology, da, da, da, and  
12 then list.

13 MS. SMITH-DeWAAL: Well, this was not -- that word  
14 goes down here, that that is what we want them to come back  
15 with. We want the scientists to look at what the  
16 alternatives are for a performance standard, what the  
17 options are for a performance standard, and the  
18 alternatives.

19 DR. HURLBERT: Okay. I will just do whatever. I  
20 just don't want years from now -- I don't want to be mean,  
21 but your constituents to come up and say but why aren't you  
22 testing, it is not enough for the government just to test.  
23 You know, that's --

24 MS. HANIGAN: You know, Jeanne just thought up a  
25 good point. Jeanne, can you go through the point you just

1 brought up with me? Would you have a seat, please,  
2 Caroline?

3 MS. SMITH-DeWAAL: I just can't see it from where  
4 I am sitting.

5 MS. AXTELL: You were talking about whether you  
6 were boxed in. I think you need to make clear that when you  
7 are looking at an option coming back from the microbe  
8 committee, that if you are saying it is an option for a  
9 performance standard, you are saying quantitative versus  
10 qualitative, you are saying the option is performance  
11 standard. So I think you need to look at the wording from  
12 the standpoint of what you want to say is if the option is  
13 performance standard, that the microbe committee is advising  
14 with respect to quantitative versus qualitative, or the  
15 committee is advising with respect to other alternatives to  
16 a performance standard. Because quantitative versus  
17 qualitative is an adjective to performance standard.

18 MS. SMITH-DeWAAL: Right. And that is -- but that  
19 is -- the options went to whether it was quantitative or  
20 qualitative. So that -- the basic question is the  
21 alternatives, and alternatives, whether that should then go  
22 at the end of the sentence, alternatives --

23 MS. AXTELL: Or alternatives to a --

24 MS. SMITH-DeWAAL: A performance standard.

25 MS. AXTELL: Would that help or what?

1 MS. SMITH-DeWAAL: Or a campylobacter performance  
2 standard because what you -- the one thing -- I don't think  
3 the issue is performance criteria. The issue is really  
4 whether there is an indicator organism that meets -- would  
5 answer all of our issues with campylobacter.

6 DR. HURLBERT: No, Caroline. The question is,  
7 bottom line in my opinion, you are going to come back at  
8 some point and say, oh, no, the agency is the only one doing  
9 testing. And for right now, most people, when you say  
10 performance standard, they think it is an agency testing  
11 thing.

12 MS. SMITH-DeWAAL: Well, that is what it is, by  
13 law.

14 MS. AXTELL: By regulation.

15 DR. HURLBERT: By regulation.

16 MS. SMITH-DeWAAL: Yeah.

17 DR. HURLBERT: So are we boxing into it -- yeah.  
18 Which we're boxing into performance standard. Maybe the  
19 committee will not think that this performance standard --  
20 maybe they will think that industry should do it, and it may  
21 still have the weight of a performance standard as far as it  
22 is the law. But because of our perception of performance  
23 standard right now, we have a performance standard for zero  
24 tolerance for cooked product, you know. But you are telling  
25 us now that that is not enough, that industry should be

1 doing testing, too.

2 I am not saying that is right or wrong. This  
3 committee should tell us should industry be doing it,  
4 should, you know -- and if it weren't for the fact that we  
5 already have this preconceived notion of performance  
6 standard, I don't guess I would have that problem. But it  
7 could be that industry should be doing it. It could be  
8 agencies should be doing it. Hey, maybe it is an outside  
9 party we never thought of. But --

10 MS. SMITH-DeWAAL: So does "and alternatives" -- I  
11 mean, we want them to look at alternatives to a  
12 campylobacter performance.

13 DR. HURLBERT: Yeah.

14 MS. SMITH-DeWAAL: That would meet the same public  
15 health objective?

16 MS. AXTELL: That would be fine.

17 DR. HURLBERT: That's -- yeah.

18 MS. SMITH-DeWAAL: Alternatives. So we are moving  
19 it, and alternatives, to the very end, okay?

20 MS. HANIGAN: Would you be so kind as to write for  
21 him on this flip chart?

22 MS. AXTELL: So we can read it with the right  
23 ones.

24 MS. SMITH-DeWAAL: And alternatives to a campy  
25 performance standard that accomplishes the same public

1 health objective. That's the -- you know, anything that  
2 would do the same thing that a performance standard --

3 DR. HURLBERT: Based on their risk assessment  
4 there, yeah. Based on their science.

5 MS. SMITH-DeWAAL: So the microbe committee should  
6 look both at options for a performance standard, the  
7 qualitative versus quantitative, and alternatives to a  
8 campylobacter performance standard that accomplishes the  
9 same -- that accomplished alternatives to that -- I try to  
10 hide the fact I have got Dan Quayle's spelling and --

11 DR. HURLBERT: No spell check.

12 (Laughter)

13 MS. SMITH-DeWAAL: That accomplishes the same  
14 public health objective.

15 MS. HANIGAN: I think that helped. I think it  
16 helped taking an hour away from it and coming back at it.

17 DR. HURLBERT: Okay. A brief sentence, because we  
18 have got support agency direction to establish the --

19 MS. SMITH-DeWAAL: No.

20 (Simultaneous discussion)

21 MS. HANIGAN: Wait a minute. Give him a minute.

22 MS. SMITH-DeWAAL: This is all as it is, down to  
23 here. And then here, request NACMCF, the microbe committee,  
24 to evaluate and recommend back to the NACMPI, that's us,  
25 options for defining the campylobacter performance standard,

1 quantitative versus qualitative, and alternatives to a  
2 campylobacter performance standard that accomplish the same  
3 public health objective. And make sure my nouns and stuff  
4 -- my nouns and verbs all work together, please.

5 DR. HURLBERT: When we are talking about that  
6 accomplish the same public health objective, we can say  
7 and -- no, we can't do that. Alternatives -- I was going to  
8 say alternatives to a campylobacter --

9 MS. HANIGAN: Yes.

10 DR. HURLBERT: -- measurement that accomplished  
11 the same -- alternative ways for campylobacter measurement.

12 MS. HANIGAN: Okay.

13 MR. COOK: I still have a question about -- well,  
14 that was point two. I got it now. The subcommittee  
15 supports agency direction to number one -- should this all  
16 be to comma --

17 MS. SMITH-DeWAAL: No, no, no. To establish a  
18 campylobacter performance standard, including --

19 MR. COOK: That is not a subpart.

20 MS. SMITH-DeWAAL: That -- this is what we are  
21 supporting. This is the current direction that they are  
22 going. These are the steps they are taking. And two, we  
23 request this and that. So let me see --

24 MR. COOK: Well, I mean, I had that as a --

25 MS. SMITH-DeWAAL: I bet you want that --

1 MR. COOK: Back up there.

2 MS. SMITH-DeWAAL: Yeah.

3 MR. COOK: I had it up there, okay?

4 MS. SMITH-DeWAAL: Yeah. You were doing fine.

5 MR. COOK: But how does that tie in -- my question  
6 is how does that tie in with evaluation methodology,  
7 completing baseline --

8 MS. SMITH-DeWAAL: I would put the one here, and  
9 then just ABC. Or put A there and -- you just want these  
10 two points to be of equal weight. So it is not this being  
11 one and that being two. That whole thing --

12 MR. COOK: But this is what you want to say. You  
13 want this to go back up here and say and --

14 (Simultaneous discussion)

15 MS. HANIGAN: Because that statement just kind of  
16 hangs there like what is going on with this statement.

17 MS. SMITH-DeWAAL: Well, in here we are saying  
18 this is what the subcommittee is really doing.

19 (Simultaneous discussion)

20 MS. HANIGAN: It is a quarter after 8:00 -- or  
21 quarter after 9:00. Our subcommittee is dismissed. Or you  
22 can wait if you want to read this.

23 (Simultaneous discussion)

24 (Whereupon, at 9:12 p.m., the meeting was  
25 adjourned.)

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Place of Hearing

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Date of Hearing

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