

This brief report captures the comments and suggestions of field personnel. Survey results are reported for 1) the clarity of each of the main content sections of the directive and 2) distribution problems.

Key Findings

Staff felt the Directive format was good and the content was generally clear, although some questions on content remain. In some cases, staff said the content was clear, but they disapproved of the practice required. Some of the more serious confusion and controversy centered on replacement certificates and “in lieu of” applications, as well as pre-stamping of product. Field staff want to serve on directive committees.

Distribution problems were infrequent, but difficult for inspectors to solve. A mechanism to quickly update address changes needs to be found, as well as quick distribution of new required forms.

Clarity of Main Sections

Most staff found the content clear and format good. Comments from those who had difficulty are provided below for Directive sections VI-XII (the primary content areas), the new form, and the questions & answers segment.

Section VI. Where to find information regarding a country’s export requirements

- Some do not know how to access Export Library, although touted in Directive.

Section VII. The meaning of “sensory evaluation”

- Define “sensory evaluation” in this directive, even though it is addressed in cited Directive 9040.1.

Section VIII. Pre-stamping of product

- Disagreed with practice – opposed to stamping of product with USDA seal until forms signed.

Section IX. The type of documentation needed for export shipments

- Provide clear definitions for “certifying official” and “inspection program employee.”
- Directive supports the requirement that a certifying official needs to sign the original certificate in “other than black ink,” -- staff now have a document to reference when this issue arises (sec. IX, Par. D, p. 5).
- The section on computerized stamps now justifies this practice to foreign officials.

Section X. Replacement certificates

- Request clarification of “in lieu of” applications (which happen for split loads, lost documents, or a change in name or consignee).
- Disagreed with practice--request that sec. X, paragraph A.4 be dropped (allowing a replacement certificate if the original has been lost).
- Asked if replacement paperwork can be produced after a document is already shipped. Interviewees said that some countries just want to slow down U.S. procedures and block commerce--using time-consuming paperwork issues to do so.

Section XI. Letterhead certificates

- Some staff had never completed these in practice.
- Noted problem -- carbon copy letterhead required, but you cannot obtain this from FSIS distribution. Instead of telling the

plants that USDA does not have the proper forms, they use single forms.

Section XII. Inventory

- Noted problem -- great difficulty obtaining new 9060-6 Forms; some waiting months.

FSIS Form 9060-6

- Explain in more detail what to do with the form.
- Make form available on Form Flow.
- Prefer Form 9060-6 to the previous form; easier to use (as country codes were not needed).
- Provide additional space to enter required information.
- Clarify “in lieu of” -- causes confusion and controversy.
- Clarify that the new form is required.
- Make language more explicit; e.g., if a signature is required, then change “should” to “must” sign.
- Separate species to facilitate understanding.
- Change block #3 to read “MP” instead of “MPA” as some plants assign numbers alphabetically (and this change will allow MP... to be entered before MPA... series).
- Clarify instructions for Block #4 —do they need to specify the company name or personal name, as the company name is preferred.
- Add blocks for consignor/consignee.
- Add more space to block #14, provide less lines in block #15 (body of form).

Questions and Answers Segment

- Section was clear, useful, and anticipated many common questions.
- Recommend additional questions:
 - Should the plant receive a copy of the signed certificate?
 - Can the certifying official be either a veterinarian or an inspector for most countries?
 - When multiple plants are supplying products collected in one location and consolidated into one certificate, do the individual supplier plants need to complete the application when they send in their part?

General Comments on the Directive

- Field staff should be on directive committees to ensure that issuances and forms are realistic and complete.
- Use simple, straightforward explanations when stating what activity should be done. A “cookbook” approach should be used wherever possible so that staff do not need to interpret the Directive.
- Clarify gray areas with detail to avoid subjective interpretations.
- Recognize that in real field situations, the volume of exports is so high that it is very difficult to follow the procedures exactly as they are laid out in the Directive. Provide guidance for how staff can follow the minute detail in the Directive and meet the extremely tight schedule at each plant (30 minutes per plant to conduct inspection).
- Useful assistance to clarify Directives was obtained, as needed, from Technical Service Center staff, supervisors and colleagues.
- Add link for Export Library already on Internet to Outlook.

Distribution Problems

All staff had been able to obtain the Directive one way or another, but problems with updating the mailing list difficult to solve.

- Most received the Directive by mail between 3 weeks and 3 months from issuance date, usually at their base plant. Alternatively, if it did not arrive, a colleague or supervisor supplied a copy; or calls were made to FSIS offices to obtain a copy; and e-mail was used by some.
- Institute hot line to correct problems in updating mailing addresses if changed due to plant closings or re-assignments
- Most staff prefer to receive issuances by regular mail and email. Staff explained that they are usually happy with distribution by mail, but the mail could be late, and email provides them with instant access to issuances. Others felt that receiving issuances by mail was a safe backup while they were learning how to use computers to access issuances.
- Additional computer training would be very useful in assuring that staff are up-to-date in their ability to access email and the Internet (including the Export Library and new and old issuances). Some stated that they have not received government computer training for four years.
- Those who advocated receiving issuances via email (or the FSIS Internet site) felt it is more convenient, faster, cheaper for the government, and more reliable than regular mail. They also do not need to carry extensive paperwork from plant to plant. In addition, they can obtain issuances that are older when they need them as well as new issuances. Send e-mail notification to announce new Agency issuances.
- Need: 1) access to computers, 2) knowledge of how to use computers,

3) sufficient time to peruse email and download/print while moving quickly from plant to plant (with about 30 minutes/plant), and 4) the ability to print forms on the spot.

- Noted receiving duplicate issuances; same issuance at each plant in assignment.
- Complained that many irrelevant issuances are received.
- Provide a user-friendly procedure and instructions for quick and easy access to new and old issuances.
- Consider a method to designate the importance of issuances, such as by the color of paper.
- Circulate a monthly list of new issuances so inspectors would know if they had missed a new issuance.
- Ensure that plants receive new issuances, and that plants understand how to access issuances from a central FSIS source (such as the Internet). Inspectors often serve as information sources for plants and this would facilitate the process.
- New 9060-6 Forms took months to receive and then did not receive the type that allowed multiple carbon copies. Staff were told the Landover distribution center was overwhelmed. In addition, some staff did not understand that they could not use up the old forms.

Few asked for assistance in clarifying the Export Directive

Some sought clarification and obtained satisfactory assistance from the Technical Services Center or other colleagues. In the past, calls for assistance were not always able to resolve confusion.

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