



Food Safety and Inspection Service

Small and Very Small Plant Humane Handling DVMS Enhanced Outreach Plan

*Submitted by
Dr. Quita Bowman Blackwell
National Humane Handling Enforcement Coordinator*

2019

TABLE OF CONTENTS

EXECUTIVE SUMMARY	3
INTRODUCTION	5
BACKGROUND	6
DVMS ENHANCED OUTREACH VISIT (DEOV) APPROACH AND TIMELINE	8
OUTREACH VISIT PROCESS	8
Pre-Visit Data Review	8
Outreach Visit	9
Post-Visit Actions	9
Outreach Analysis by the Agency	9
ENHANCED OUTREACH PLAN SCHEDULE MILESTONES	11
COMMUNICATION PLAN	12
COLLABORATION AND PARTNERSHIP WITH INDUSTRY	13
RESOURCES	14
NEXT STEPS	14
POINT OF CONTACT	15
ACKNOWLEDGMENTS	16
APPENDIX 1: DVMS Procedures for DEOV.....	17
APPENDIX 2: Evaluation Feedback Questions for DEOV	21
APPENDIX 3: Humane Handling/Good Commercial Practice (GCP) Resources.....	23
APPENDIX 4: Talking Points for DVMS Use During Enhanced Outreach	28
APPENDIX 5: Sample Humane Handling/GCP Non-compliance Records (NRs) to Share with Establishments.....	32
APPENDIX 6: Pilot Outreach Program.....	39

Executive Summary

This document is the Food Safety and Inspection Service's (FSIS) Enhanced Outreach plan to support small and very small establishments with humane handling and good commercial practice (GCP) issues. Small and very small establishments are the largest block of all slaughter establishments receiving federal inspection and therefore required to meet the Humane Methods of Slaughter Act (HMSA) and GCP regulation. This voluntary outreach program will support them with their humane handling or GCP program. The agency will provide one-on-one support to small and very small establishments with subject matter experts (SMEs), the District Veterinary Medical Specialists (DVMSs), who will conduct these enhanced visits.

The DVMS Enhanced Outreach Visit (DEOV) includes several components to provide the best outcome for small and very small establishments (both meat and poultry) in support of bolstering their humane handling or GCP program. The Agency developed a methodology for the DEOV to include preparation for the enhanced visit, the one-on-one visit, and post-visit activities. A list of humane handling and poultry resources is provided for DVMSs to share with slaughter establishments. Talking points are provided for the DVMSs visit. The information provides sample topics and questions for before and during the outreach visit. Also shared in this document is the Pilot Outreach Program (POP); which discusses how the Outreach Workgroup tested and refined the plan. Along with the visits, the plan discusses potential ways of working with Industry to support the goal of establishments adopting best practices. This outreach approach is in congruence with, although separate from, the standard DVMS Humane Handling Verification Visit (HHVV) or the GCP Verification Visit (GCPVV) requirements. Although participation by the establishment in the DEOV is voluntary, enhanced outreach to these establishments, both livestock (covered by the HMSA) and poultry (covered by the Poultry Products Inspection Act [PPIA] of 1957), is substantially important to ensure that these establishments have the guidance and resources for best practices needed to comply with FSIS regulations.



Introduction

The U. S. Department of Agriculture's (USDA) FSIS has developed an initiative to increase small and very small slaughter establishments' knowledge of humane handling and GCP best practices, leading to adoption of such practices for both meat and poultry. This document is a manifestation of that effort. Small and very small establishments represent approximately ninety (90) percent of the more than 6,000 establishments regulated by FSIS. As such, outreach to these establishments is critically important to ensure that they have the guidance and resources needed to comply with FSIS humane handling regulations and GCPs. These visits are for both meat and poultry establishments. This will ultimately deliver products that are safe and wholesome. FSIS observed establishments that adopt these best practices increase compliance with humane handling regulatory requirements. To increase this knowledge, FSIS is proactively implementing voluntary enhanced outreach by DVMSs to small and very small slaughter establishments. This outreach approach is separate from but supports the standard DVMS HHVV/GCPVV requirement.

The DEOV objective is to support and expand small and very small slaughter establishments' knowledge of humane handling and GCP best practices through one-on-one visits and other outreach events. This will lead to progress in increasing adoption of best practices, more consistent and effective application of best practices, and more compliance with regulatory requirements for both humane handling of livestock and GCP of poultry.

DEOV Program Development Activities

- Design and implement a new educational strategy targeting small and very small establishments focused on preventing humane handling/GCP non-compliance that result in FSIS enforcement actions.
- Assist small and very small establishments to better their understanding of achieving humane handling/GCP compliance.
- Develop a structure for DVMS use as a guide for conducting the DEOV.
- Develop and update existing materials/resources and products to support the humane handling/GCP compliance needs of small and very small slaughter establishments. This will include a list of resources such as industry associations and extension offices.

Background

This initiative directly supports the FSIS Strategic Plan for Fiscal Years (FY) 2017–2021 through Goal 2: Modernize Inspection Systems, Policies, and the Use of Scientific Approaches, Outcome 2.1. Improve Food Safety and Humane Handling Practices Through Adoption of Innovative Approaches. These are measured through Objective 2.1.1. Modernize Scientific Techniques and Inspection Procedures and Objective 2.1.2. Increase Adoption of Humane Handling Best Practices. Each year, the measures are outlined in the Agency's Annual Plan. The goal is for slaughter establishments to increase adoption of humane handling best practices. The focus is on livestock slaughter using humane methods, with a specific focus on restraint and/or stunning of livestock to improve establishment compliance with regulatory requirements. Poultry GCPs are also a priority in focusing on best practices. The goal being to reach out to FSIS-regulated slaughter establishments, specifically small and very small establishments, with support. The primary objective for this initiative is to improve compliance through enhanced outreach to Industry, particularly small and very small slaughter establishments. This should reduce the risk of humane handling non-compliance at slaughter establishments.

Small and very small establishments are most of FSIS-regulated slaughter facilities. Out of the approximately 1,150 slaughter establishments, 266 (186 meat and 80 poultry) are small establishments and 653 (597 meat and 56 poultry) are very small establishments, totaling 919 in the small and very small categories. Based on the data, humane handling non-compliances occur more in small and very small establishments as they make up the majority of eligible establishments. To address this issue, FSIS constructed this outreach plan as an enhanced education and outreach strategy designed to target small and very small establishments. This is shared in the FSIS 2019 Annual Plan. This is to ensure more consistent application of humane handling and GCP best practices and compliance with regulatory requirements.

The primary method to achieve these objectives is with enhanced outreach by the Agency's DVMSs. This DVMS action plan was designed to support these efforts via one-on-one outreach meetings with a DVMS and an establishment. The enhanced outreach meetings will provide the DVMS an opportunity to highlight prevention of multiple stun events that result in FSIS enforcement actions. This is distinct from the regulatory HHVV/GCPVV that DVMSs will continue to perform. The HHVV/GCPVV purpose is to assess the establishment's humane handling/good commercial practice system as required by regulation, policy, and to meet the HMSA for livestock. The purpose of the voluntary DEOV is to provide support, understanding and clarification

of humane handling and GCP requirements specific to the small and very small establishment being visited. Prioritization of the DEOV should be data-driven and informed by Humane Handling Non-Compliance Records (HHNR), Humane Handling Memorandum of Interview (HHMOI), or other information that might indicate a critical need. For poultry establishments, this would include GCP NRs, GCP MOIs, weekly meeting MOIs and other pertinent information. For example, Districts may review information from prior years and prioritize those establishments that historically have a higher frequency of compliance issues. Districts should reach out to small and very small establishments and offer this assistance based on this prioritization.



DVMS Enhanced Outreach Approach and Timeline

This document provides a framework to guide DVMSs in their enhanced outreach visits and activities for small and very small slaughter establishments. The structure for the DEOV is comparable to the current regulatory DVMS HHVV/GCPVV. However, the goals and two-way nature of the communications has a new and different objective. Regular DVMS HHVVs/GCPVVs are conducted to assess the slaughter establishment's status with their humane handling or good commercial practice system or program. The DEOV is voluntary (non-regulated) and focus on four to five items for livestock, depending on the establishment's status at the time of the visit. Those items include:

- Livestock:
 - Communications with establishment management;
 - Proper stunning and restraint of animals;
 - Sufficient humane handling facilities;
 - Humane handling enforcement actions; and
 - Robust Systematic Approach (RSA) to humane handling and slaughter of livestock.
- Poultry:
 - Pertinent GCP topics, concerns, and resources.

Each District should follow the DEOV process below to conduct, track and monitor humane handling and GCP outreach activities.

Outreach Visit Process

The outreach activities and resources used may vary depending on the individual establishment's pre-visit data review and/or requests from establishment management. Overall, the one-on-one visits will include a walk-through of the humane handling or poultry facilities and follow the approach outlined below and the more detailed DVMS Procedures for DEOV in Appendix 1 (page 17).

Pre-visit Data Review

- Review the establishment's humane handling/GCP compliance history over an appropriate time (e.g., 12 to 18 months) but at least to the previous DVMS HHVV (as outlined in FSIS Directive 6910.1);
- Contact establishment management to discuss their humane handling/GCP needs or items they want to discuss during the outreach visit. If the establishment agrees to the outreach visit, set up the outreach visit date; and

- Contact the Frontline Supervisor (FLS) and Inspection Program Personnel (IPP) and check with them about any establishment-specific concerns.

Outreach Visit

- Introduce and explain a DEOV and the difference between this visit (non-regulatory) and a HHVV or GCPVV (regulatory). Follow Appendix 1 (page 17) and use the talking points in Appendix 4 (page 28);
- Discuss the overview outlined above as an enhanced outreach visit by a DVMS:
 - o Proper stunning and restraint of animals;
 - o Sufficient humane handling facilities;
 - o Humane handling enforcement actions; and
 - o Robust systematic approach (RSA) to humane handling and slaughter of livestock.
 - o Pertinent GCP topics, concerns, and resources.
- Complete a walk-through of the humane handling/poultry facilities;
- Use non-compliance examples (Appendix 5 on page 32); and
- Review topics requested during pre-visit contact or other items as they arise during the visit.

Post-Outreach Visit Actions

- Complete Outreach Report in the Public Health Information System (PHIS) including FSIS Forms 6000-31 for livestock and FSIS Form 6000-32 for poultry.
- Provide evaluation feedback of DEOV from both the establishment management official and the DVMS in the survey on the DVMS SharePoint site (Appendix 2 on page 21).

Outreach Analysis by the Agency

The Agency will review the data associated with this outreach effort as outlined below. The assessment will be for an appropriate timeframe to be established after assessing the number of establishments that accept the voluntary DEOV.

- Review the initial implementation and participation.
- Assess DEOV data as part of the Annual and Strategic Plan reporting.
- Review feedback on compliance rates at establishments that received visits over an appropriate timeframe.



Enhanced Outreach Plan Schedule Milestones

Milestone	Target Date	Completion Date
Establish DVMS Small/Very Small Plant Outreach Workgroup	March 2019	March 2019
Establish regular workgroup meetings	March 2019	March 2019
Review 2018 Small/Very Small survey data and assign research for additional data to support development of Outreach Plan	April 2019	March 2019
Start drafting Outreach Plan outline	May 2019	April 2019
Develop draft plan for POP	June 2019	May 2019
Identify potential establishments for the POP	June 2019	June 2019
Select DVMSs to implement District-specific POP	June 2019	June 2019
DVMS team members execute District-specific POP	July - August 2019	July - August 2019
Develop summary and analysis of FY19 POP	August 2019	Analysis - August 2019 Summary - September 2019
Develop humane handling outreach Communications Plan for DVMSs	August 2019	August 2019
Revise Outreach Plan based on POP analysis	September 2019	September 2019
Finalize Humane Handling Outreach Plan and Communications Plan	September 2019	September 2019
Submit to Executive OFO Management for clearance	September 2019	September 2019
Revise per OFO and obtain other clearances as needed	October 2019	October 2019
Develop an Implementation Plan for approved DEOV	October - November 2019	November 2019
DVMS Meeting - Begin Scheduling DEOV Nationwide	December 2019	Meeting planned for December 2019 / begin initial scheduling of DEOV after meeting
Full roll-out of DEOV	January 2020	January 2020

Communication Plan

The Communications Plan, to be developed by the Office of Public Affairs and Consumer Education (OPACE), for the DEOV for humane handling and GCP to small and very small establishments includes general talking points to be used with the media, industry, animal welfare advocate organizations, and the public. As part of the DEOV, talking points are available to guide DVMSs with their communication with the establishment, including general topics to cover before and while meeting with the establishment and sample language that can be used as a guide (Appendix 4 on page 28).

Other products to be managed by OPACE include:

- Stakeholder advisory;
- Press release;
- Articles in internal news channels – *The Beacon* and *Wednesday Newsline*;
- Articles for external distribution – *Constituent Update* and USDA Radio; and
- Presentation slides for FSIS officials.

Timing of communications will be outlined in the Implementation Plan developed after approval of this plan.



Collaboration and Partnership with Industry to Support

FSIS outreach efforts intended for small and very small establishments' humane handling/GCP program should include industry outreach as an important component. This includes working directly with industry organizations that represent owners and operators of small and very small establishments to share this new enhanced outreach support, discuss humane handling/GCP regulatory compliance, review available resources, and respond to inquiries. The FSIS DEOV objectives can also be met through working with partners and stakeholders internal and external to the Agency to develop outreach materials, inform policy, and actively participate in existing outreach efforts. This can include one or more of the following approaches:

- **DEOV** – one-on-one discussions in coordination with establishment owners and operators to meet in the establishment or other agreed-upon location;
- **Regional/Circuit Meetings** – meetings with owners and operators in a given circuit or region;
- **DVMS Participation in Grant of Inspection Application Review** –providing an opportunity for DVMSs to meet with establishment owners and operators and establish themselves as a resource for assistance and a conduit for additional humane handling/GCP information; and
- **Workshops and Conferences** – participate in workshops or conferences that reach and benefit small and very small establishments to share the voluntary DEOV opportunity and information.

Ultimately, DVMSs should establish themselves as a resource for assistance and additional information.



Resources

FSIS has several resources available to support enhanced outreach to small and very small establishments on humane handling and GCPs. As outreach efforts continue, DVMSs are encouraged to provide feedback on guidance and resources developed by FSIS and to identify useful support developed through partners. These are a few examples:

- [Industry Support and Resources](#) (see updated link from FSIS homepage);
- [Small Plant Help Desk](#);
- [Niche Meat Processor Assistance Network](#) (search for humane handling);
- [Cooperative Extension System](#)

See Appendix 3 (page 23) for a more comprehensive list of resources.

Additionally, the National Humane Handling Enforcement Coordinator (HHEC) will facilitate coordination with the Office of Employee Experience and Development (OEED), OPACE and the Office of Policy and Program Development (OPPD) to develop additional resources and support as needed and assist in coordination with other outreach efforts across the Agency and with Industry.

Next Steps

After the Agency completes preparations for the small and very small establishment DEOV program, including readying the DVMSs for additional duties, the Office of Field Operations (OFO) will fully implement the program in calendar year (CY) 2020. OFO will continue to identify resources and review the program to make adjustments as needed. Updates will be provided to the DVMSs by email and/or through the DVMS SharePoint site. OFO will work with OPACE, OEED, OPPD and others as appropriate to identify training and resources for DVMSs on crucial conversations, messaging, policy changes, and related topics that may be beneficial.

Point of Contact

If you have questions or need support from other program areas to implement these outreach activities, contact the National HHEC:

Dr. Quita Bowman Blackwell

National Humane Handling Enforcement Coordinator

Office of Field Operations

Food Safety and Inspection Service

United States Department of Agriculture

(202) 205-0081

quita.bowmanblackwell@usda.gov



Acknowledgments

Much appreciation goes to the Small and Very Small DVMS Outreach Workgroup that designed and tested this important project.

Dr. Quita Bowman Blackwell – Lead

Dr. Travis Auxier

Dr. Claire Hotvet

Dr. Renee Larson

Ms. Laura Reiser

Dr. Kurt Schulz

Dr. Ariel Thompson

Thanks also to other DVMSs who significantly contributed to this project.

Dr. Adil Abdalla

Dr. Kermit Harvey



APPENDIX 1:

DVMS Procedures for DEOV

DVMS Procedures for DEOV

The outreach activities and resources used may vary depending on the individual establishment's pre-visit data review and/or requests from establishment management. This is a voluntary program, therefore the DEOV should be prioritized and targeted to the small and very small establishments that have humane handling/GCP issues as outlined in the Background section (page 7) of this document. Overall, the one-on-one visits should follow the approach outlined below.

Initial Contact for DEOV

- Introduction and explanation of the DEOV as opposed to the HHVV/GCPVV.
- Voluntary and non-regulatory.
- If the offer for a DEOV is declined, note that where appropriate on the evaluation/feedback survey through the DVMS SharePoint site (Appendix 2 on page 21).
- If the outreach visit offer is accepted continue with Pre-visit Data Review Section (page 8).

Pre-visit Data Review

- Review establishment information since the previous DVMS HHVV/GCPVV documented in PHIS. The DVMS will review PHIS and local files to identify trends through Humane Handling Enforcement Actions (HHEA), HHNRs, HHMOIs, GCP NRs, GCP MOIs, weekly meeting MOIs, Letter of Concern (LOC), etc.
- Contact establishment management to set up a mutually agreed upon time and location for the outreach visit.
 - o DVMS is to ask the establishment if they have any specific topic requests and if they have a format preference (electronic documents, paper copies, PowerPoint presentations, etc.).
- Contact the FLS and IPP to check for any establishment-specific concerns.

Outreach Visit

- Brief review of introduction and explanation of the DEOV as opposed to the HHVV/GCPVV and that this DEOV is voluntary and non-regulatory.
- Explanation of how "adequate" restraint, or lack thereof, has been identified and associated with trends in HHNRs and HHEAs.

- Explanation of how the regulated industry's stunning decisional methodology (especially in small and very small establishments) has been associated with trends in HHNRs and HHEAs.
- Review/Explanation of how OFO considers the issuance of HHMOIs, weekly meeting MOIs, HHNRs, and HHEAs as providing communication and part of Due Process as required by regulation 9 CFR Part 500.
 - Explanation of the various aspects of HHEAs (Notice of Intended Enforcement [NOIE] versus Notice of Suspension [NOS] and Notice of Reinstatement of Suspension [NROS], etc.).
 - Steps/Progression of events from time of notification of an incident, mitigation of enforcement action, verification period, and closeout procedures, including expected timeframes.
 - Explanation of the Agency's position on establishments with repetitive HHEAs for same/similar causes (referral to the Enforcement and Litigation Division [ELD]).
 - Review sample HHNRs (Appendix 5 on page 32).
- Complete a walk-through of the humane handling/poultry facilities.
- Review additional topics if requested by establishment either during initial contact or during course of discussions.
- RSA discussion/review in light of covered topics.
- Close out of DEOV:
 - Short summary of items discussed; and
 - Review evaluation questions with manager/establishment personnel visit was conducted with.

Post-Outreach Visit Actions

- Complete Report in PHIS:
 - Complete data entry in PHIS for 7000 Form 6000-31 for livestock and/or 7000 Form 6000-32 for poultry;
 - Under Reason for Visit (Box 12) Check "Special Correlation/ Other" and type "Outreach" in the Other Reason text box;
 - List personnel present during discussion in Box 15 (Narrative - Correlation);
 - Document topics discussed in Box 15 (Narrative - Findings); and
 - Document resources shared in Box 15 (Narrative - Findings).

- Enter evaluation feedback of DEOV from both the establishment management official and the DVMS in the survey on the DVMS SharePoint site (Appendix 2 on page 21).

Follow-up Action Items

- Provide additional or follow-up information and resources as needed based on site visit discussion.

NOTE: The DVMS has flexibility to assign/change a planned HHVV/GCPVV to a DEOV when conducting assessment visits to small and very small establishments, if the occasion arises. For example, if a HHVV/GCPVV is scheduled and for some reason no animals are present for slaughter, at the consent of establishment management, the DVMS could conduct a DEOV.

APPENDIX 2:

Evaluation Feedback Questions for DEOV

Evaluation Feedback Questions for DEOV

- All portions of this evaluation are to be filled out by the DVMS through the DVMS SharePoint site.
- If the DEOV has been declined by the establishment, please mark “visit declined” and include any reasons given for the declination. in the appropriate section of the DVMS SharePoint site (Appendix 2 on page 21).

Questions to ask of the Establishment Owner/Designee:

On a scale of 1 – 4, where 1 is very little and 4 is very much:

1. How beneficial did you find this DEOV? (SCALE)
2. How useful did you find the resources? (SCALE)
3. Would you recommend this type of outreach in the future? (SCALE)
4. Do you feel that you learned new information from this visit? (SCALE)
5. Were there any topics that you would like to see covered in the future?(COMMENT FIELD)
6. What is your preferred format for resources (e.g., electronic, CD, or paper)? (SELECT MULTIPLE OPTIONS)

Questions for the DVMS post-visit:

1. Did this establishment seem to react favorably to this outreach? (Y/N)
2. Were the resources listed useful during the visit? (Y/N)
3. Were any areas identified for improvement during this visit (i.e., was there a positive change as a result)? (Y/N)
4. Do you have any suggestions for changes to this outreach in the future? (COMMENT FIELD)

APPENDIX 3: Humane Handling / GCP Resources

Humane Handling and GCP Resources

These resources are available to DVMSs to share with slaughter establishments.

FSIS Humane Handling Resources

- Humane Methods of Slaughter Act §1902 (<https://www.govinfo.gov/content/pkg/USCODE-2014-title7/pdf/USCODE-2014-title7-chap48.pdf>);
- 9 CFR 313 (<https://www.govinfo.gov/content/pkg/CFR-2000-title9-vol2/pdf/CFR-2000-title9-vol2-part313.pdf>);
- FSIS Directive 6900.2 Rev.2 8/15/11 Humane Handling and Slaughter of Livestock (<https://www.fsis.usda.gov/wps/wcm/connect/2375f4d5-0e24-4213-902d-d94ee4ed9394/6900.2.pdf?MOD=AJPERES>);
- FSIS Humane Handling Resources webpage (<https://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/humane-handling>);
- HIKE Scenarios (<https://www.fsis.usda.gov/wps/portal/fsis/topics/inspection/workforce-training/hike/hike-scenarios>);
- Situation-Based Humane Handling Modules 1 and 2 (2011) (<https://www.fsis.usda.gov/wps/portal/fsis/topics/inspection/workforce-training/regional-on-site-training/Humane+Handling+of+Livestock>);
- 2013 FSIS Compliance Guide of a SA to the HH of Livestock (<https://www.fsis.usda.gov/wps/wcm/connect/da6cb63d-5818-4999-84f1-72e6dabb9501/Comp-Guide-Systematic-Approach-Humane-Handling-Livestock.pdf?MOD=AJPERES>);
- 2017 PHV Refresher Training: Consciousness and Stunning (<https://www.fsis.usda.gov/wps/wcm/connect/bd0306ae-68ce-4337-ad3e-61da08eabbaa/PHV-Refresher-Training-Consciousness-Stunning.pdf?MOD=AJPERES>);
- Federal Register Notice/Vol. 69, No. 174, September 9, 2004 – Merits of a Systematic Approach (<https://www.fsis.usda.gov/wps/wcm/connect/3057b87f-1b34-49ea-8e8d-73414b576e5e/04-013N.pdf?MOD=AJPERES>);
- USDA FSIS Humane Handling of Livestock and Poultry: An Education Guidebook Based on FSIS Policies (Revised June 2015) (https://www.fsis.usda.gov/wps/wcm/connect/96407439-2142-40c7-8e16-c24949f637ce/humane_handling_booklet.pdf?MOD=AJPERES);

- Humane Handling of Livestock and Good Commercial Practices in Poultry PHV Training (04-18-2017) (https://www.fsis.usda.gov/wps/wcm/connect/175cda99-ece9-48de-9f75-95499ac3cee7/PHVt-Humane_Handling.pdf?MOD=AJPERES);
- AskFSIS Humane Handling Answered Questions (<https://askfsis.custhelp.com/app/answers/list/st/5/kw/Humane%20Handling/page/1>);
- FSIS Humane Handling Blog (<https://www.usda.gov/media/blog/archive/tag/humane-handling>);
- Small Plant Help Desk (<https://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/svsp/sphelpdesk>);
 - Email: InfoSource@usda.gov or call 1-877-FSIS-HELP (1-877-374-7435).

FSIS Poultry Resources

- FSIS PHIS Directive 6100.3 4/11/11 Ante-Mortem and Post-Mortem Poultry Inspection (https://www.fsis.usda.gov/wps/wcm/connect/724ad094-823a-4e06-83f4-47ecbbefad53/PHIS_6100.3.pdf?MOD=AJPERES);
- FSIS Directive 6110.1 7/3/18 Verification of Poultry Good Commercial Practices (<https://www.fsis.usda.gov/wps/wcm/connect/39d791f2-6bc2-4bb4-bdfc-72504da30f76/6110.1.pdf?MOD=AJPERES>);
- Federal Register Notice/Vol. 70, No. 187, September 28, 2005 - Treatment of Live Poultry Before Slaughter (<https://www.govinfo.gov/content/pkg/FR-2005-09-28/pdf/05-19378.pdf>);
- DOAs in a Poultry Slaughter Establishment Ask FSIS Question (https://askfsis.custhelp.com/app/answers/detail/a_id/1166/kw/doa);
- Humane Handling Ombudsman: Dr. Kurt Schulz
 - If you have a humane handling related comment, concern, or wish to file a complaint, Dr. Schulz's contact information is below:
 Email: kurt.schulz@osec.usda.gov
 USDA/FSIS Attn: Dr. Kurt Schulz
 Edward Zorinsky Federal Building
 1616 Capitol Avenue, Suite 260
 Omaha, NE 68102

Resources for Industry

- North American Meat Institute Foundation (<http://www.animalhandling.org/>);
 - Recommended Animal Handling Guidelines & Audit Guide: A Systematic Approach to Animal Welfare; June 2017 Rev. 1 (<http://certifiedhumane.org/wp-content/uploads/animal-handling-guidelines-June152017.pdf>);
- Temple Grandin – Website Resources (<https://www.grandin.com/>);
- Humane Slaughter Association (UK Resource) (<https://www.hsa.org.uk>);

- National Chicken Council (<https://www.nationalchickencouncil.org/>);
- National Turkey Federation (<https://www.eatturkey.org/standards/>).

Captive Bolt

- Captive-Bolt Stunning of Livestock, Humane Slaughter Association (2013) (<http://www.hsa.org.uk/introduction/introduction>); and
- Bildstein, Chuck. Captive Bolt Guns & Electrical Stunners. Bunzl Processor Division Koch Supplies (2019) (<https://www.meatinstitute.org/index.php?ht=a/GetDocumentAction/i/160441>).

Firearms

- Humane Killing of Livestock Using Firearms. *Humane Slaughter* (2014)(<https://www.hsa.org.uk/downloads/publications/humane-killing-using-firearms-updated-with-2016-logo.pdf>); and
- Woods, Jennifer. Firearm Stunning Beef and Sheep. VPM – *Animal Welfare; NAMI Animal Care and Handling Conference*. (Oct. 2016) (<https://www.meatinstitute.org/index.php?ht=a/GetDocumentAction/i/127674>).

Electrical

- Electrical Stunning of Red Meat Animals. Humane Slaughter Association (2016) (<https://www.hsa.org.uk/downloads/publications/electricalstunningdownload.pdf>); and
- Vogel, K. D., Bradtram, G., Claus, J. R., Grandin, T., Turpin, S., Weykler, R. E., and Voogd, E. (2011). Head-only followed by cardiac arrest electrical stunning is an effective alternative to head-only electrical stunning in pigs. *Journal of Animal Science*. 89 (1412-1418) (<https://www.ncbi.nlm.nih.gov/pubmed/21183712>).

Controlled Atmosphere

- Martoft, L., Lomholt, L., Koltoff, C., Rodriguez, B. E., Jensen, E. W., Jorgensen, P. F., Pedersen, H. D., & Forslid, A. (2002). Effects of CO2 anaesthesia on central nervous system activity in swine. *Laboratory Animals* 36 (116-126)(<https://www.ncbi.nlm.nih.gov/pubmed/11943075>); and
- Carbon Dioxide Stunning and Killing of Pigs. Humane Slaughter Association (May 2007) (<https://www.hsa.org.uk/downloads/technical-notes/TN19-carbon-dioxide-pigs-HSA.pdf>).

Kosher and Halal Slaughter

- Grandin, T. (2014). Kosher Box Operation, Design, and Cutting Technique will Affect the Time Required for Cattle to Lose Consciousness. Department of Animal Science at Colorado State University (<http://grandin.com/ritual/kosher.box.variables.time.lose.sensibility.html>); and
- Grandin, T. (2012). Maintaining acceptable animal welfare during Kosher or Halal slaughter. Department of Animal Science at Colorado State University (<http://grandin.com/ritual/maintain.welfare.during.slaughter.html>).

Troubleshooting

- Grandin, T. (1996). Factors that impede animal movement at slaughter plants. *Journal American Veterinary Medical Association*. 209 (757-797)(<https://www.grandin.com/references/abstract-14.html>);
- Trouble shooting Captive-Bolt Equipment, *Humane Slaughter Association* (2013) (<https://www.hsa.org.uk/introduction/troubleshooting-captive-bolt-equipment>); and
- Voogd, Erika L. Improving Electrical Stunning with B&D Stunner. Voogd Consulting, Inc. (2011) (http://www.voogdconsulting.com/images/Improving_Electrical_Stunning_with_B_D_Stunner_2013_AC.pdf).

Poultry Resources

- Welfare Guidelines. National Turkey Federation. *AMI Animal Care and Handling Conference*. (October 2014) (<https://www.meatinstitute.org/index.php?ht=a/GetDocumentAction/i/104491>);
- National Chicken Council Animal Welfare Guidelines and Audit Checklist For Broilers. NCC. (February 2017) (https://www.nationalchickencouncil.org/wp-content/uploads/2018/07/NCC-Animal-Welfare-Guidelines_Broilers_July2018.pdf);
- Grandin, T. Poultry Slaughter Plant and Farm Audit: (July 2009) (<https://www.grandin.com/poultry.audit.html>);
- Slaughter Guidelines for Poultry. A Greener World. (<https://agreenerworld.org/certifications/animal-welfare-approved/standards/slaughter-guidelines-for-poultry/>);
- Thaxton, Yvonne Vizzler and Christensen, Karen D. Poultry Stunning. University of Arkansas System (<https://www.meatinstitute.org/index.php?ht=a/GetDocumentAction/i/116619>); and
- Bourassa, Dianna V. Controlled Atmosphere Stunning for Poultry Processing. Auburn University. *NAMI Animal Care and Handling Conference*. (Oct. 2019)(<https://www.meatinstitute.org/index.php?ht=a/GetDocumentAction/i/160399>).

APPENDIX 4:
Talking Points for DVMS Use During
Enhanced Outreach

Talking Points for DVMS Use During DEOV

These are talking prompts to help the DVMS negotiate through communications with establishment management. These are intended as a guide to be tailored by the DVMS as appropriate to meet the concerns of the establishment.

Initial Description of the Program [phone]

- ☐ New kind of DVMS visit about humane handling of livestock or GCPs for poultry for small and very small slaughter establishments.
- ☐ DEOV is in conjunction with, not a replacement of, the HHVVs/GCPVV, which will continue. The DEOV is voluntary.
- ☐ Opportunity for you to ask questions, receive information about humane handling/GCP issues that you are concerned about.
- ☐ Overall purpose is to help small and very small slaughter establishments improve compliance in humane handling of livestock and GCPs of poultry.
- ☐ This is the initial phase of implementation, FSIS will look at feedback to make future outreach visits more useful to establishments.

Pre-Visit [phone]

- ☐ Calling to schedule a DEOV. This is voluntary visit, not a HHVV/GCPVV.
- ☐ Overall purpose is to help small and very small slaughter establishments improve compliance in humane handling of livestock and GCPs of poultry.
- ☐ Opportunity for you to ask questions, receive information about humane handling/GCP issues that you are concerned about.
- ☐ Differences between a DEOV and a HHVV/GCPVV:
 - This is not and doesn't replace the HHVV/GCPVV.
 - The DEOV is to provide assistance and information, not focus on non-compliances that could be observed during the visit.
 - The DEOV is voluntary.
 - Differences between a DEOV and a HHVV/GCPVV.
- ☐ Visits may be scheduled:
 - At your request to address humane handling/GCP questions you have;
 - When you want to get information about best practices regarding a specific issue; or
 - When the Agency reaches out to your establishment to support your Humane Handling/GCP program based on current Humane Handling/GCP issues.

- ☐ Schedule a time:
 - To have the appropriate person available to discuss humane handling/GCP issues; and
 - That doesn't need to be on a scheduled day of slaughter.
- ☐ Are there any questions or concerns at this time?
- ☐ Please send questions prior to the DEOV so the DVMS can be ready with appropriate resources. Can touch base again prior to the visit if there are no questions now.
- ☐ What is the preferred format for resources/information the DVMS will bring to the DEOV (e.g., hard copy, email)?

Starting DEOV [on-site]

- ☐ Introduce yourself if you don't already know the person.
- ☐ Thanks for meeting today.
- ☐ Just to make sure we are all on the same page; this is an informational outreach visit, not a regulatory HHVV/GCPVV.
- ☐ I have some goals for our visit:
 - Answer the questions you sent and have about your establishment's compliance.
 - Discuss common questions and issues that many small and very small establishments have. These include facilities, stunning effectiveness, and RSA programs.
 - Provide resources that may be useful to you.
 - Discuss any other questions or issues that weren't already covered.

Outreach Discussion (Appendix 1 on page 17)

- Let's start with questions:
 - Discuss the topics the establishment gave in advance.
- Discuss previous issues/history of establishment compliance:
 - Discuss the humane handling/GCP violations or concerns associated with this establishment.
- Discuss humane handling/GCP trends:
 - Discuss the trends found in the pre-visit data review.

General Issues

- ☐ Make sure to touch on all the components listed:
 - Proper stunning and restraint of animals;
 - Sufficient humane handling/poultry facilities;
 - Humane handling enforcement actions; and
 - RSA - if they have an RSA you don't need to review that component unless there are questions.
 - Pertinent GCP topics, concerns, and resources.
- ☐ Discuss common questions and issues with similar establishments.
- ☐ Complete a walk-through of the facilities related to humane handling/GCPs.
- ☐ Provide information and resources that might be helpful for the establishment.
- ☐ Discuss comments/observations based on today's visit (Appendix 3 on page 23).

Close-Out of Visit

- ☐ Summarize major themes discussed in the visit.
- ☐ Any other questions or topics?
- ☐ Evaluation review/get feedback from the establishment on the visit per Appendix 2 (page 21).
- ☐ Contact the DVMS if there are any further questions/comments.
- ☐ Provide card/DVMS contact information.

APPENDIX 5:
Sample Humane Handling/GCP
Non-compliance Records (NR)
to Share with Establishment

Sample HHNRs

HATS Category I – Adequate Measures for Inclement Weather

At approximately 0645 hours while performing HATS Category IV - Handling During Ante-mortem Inspection, I observed the following non-compliance with HATS Categories I – Adequate Measures for Inclement Weather and III – Water and Feed Availability: Three goats were present in pen 1 and four steers were present in pen 3. Both pens had red plastic water buckets placed in the corners of the pens and as I reviewed the contents I noted that the water was frozen. I notified Mr. Smith, Slaughter Supervisor of the non-compliance with regulation 9 CFR 313.2(e) with regards to access to water in holding pens. Mr. Smith proceeded to dump the contents of the buckets out and I noted an approximately eight-centimeter layer of ice build-up on the top of each water bucket. Mr. Smith immediately refilled the buckets and stated he would refill them as needed during the day's production. I periodically verified that the establishment was compliant through the day. I verbally notified Mr. Smith of the forthcoming non-compliance record.

HATS Category II – Truck Unloading

At approximately 1430 hours while performing HATS Category II – Truck Unloading, I observed the following non-compliance: While watching truck unloading from the outside unloading area, I observed a livestock hauler driving one dairy cow off a livestock trailer. The cow slipped as she was walking from the trailer to the unloading ramp and her right front foot slipped into an approximately fifteen-centimeter gap between the trailer and the ramp. The cow was not able to remove her foot from the gap and vocalized. The hauler continued to try and drive the animal forward. I verbally requested that he discontinue trying to move the animal and informed him that the cow was stuck. I then notified Ms. Smith, Slaughter Supervisor, of the situation and she immediately assisted the cow in removing its front foot. After the foot was removed, I noted a five-centimeter bleeding wound on the right front foot, but the animal was fully ambulatory. As there were two other dairy cows on the trailer, I verbally notified Ms. Smith that no further unloading could occur until the gap hazard was corrected. Ms. Smith had the livestock hauler realign his truck and once no hazards were present, I allowed the other two dairy cows to be unloaded. The unloading of the other two animals went without incident. I verbally informed Ms. Smith of the forthcoming non-compliance record with regulations 9 CFR 313.1(b) (provide good footing) and 9 CFR 313.2(a) (driving with a minimum of excitement and discomfort).

HATS Category III – Water and Feed Availability (1 NR for Lack of Feed and 1 NR for Lack of Water)

At approximately 1140 hours while performing HATS Category III – Water and Feed Availability, I observed the following non-compliance: I noticed that pen 2, containing twenty head of market swine, had no visible feed in the pen. I observed truck unloading of this lot at approximately 0730 hours yesterday (2019-04-10). I asked Mr. Smith, Slaughter Supervisor, if the establishment had provided feed to the swine prior to my arrival today and he stated they had not. I verbally notified Ms. Smith, Establishment Owner of the forthcoming non-compliance record and that the animals had not been provided feed as required by regulation 9 CFR 313.2(e) as they had not been provided feed after being held for twenty-four hours. Ms. Smith immediately provided adequate feed to the twenty head of swine.

At approximately 0830 hours while performing HATS Category III – Water and Feed Availability, I observed the following non-compliance: I checked pens 2 and 3 and noted there were approximately six head of heifers without access to water. There were three black rubber round water bins present in the pens, but they did not contain any water. I verbally notified Mr. Smith, Slaughter Supervisor, that there was no water in pens 2 and 3 as required by regulation 9 CFR 313.2(e) and that I would be documenting my findings in a non-compliance record. Mr. Smith immediately filled the three rubber buckets with water.

HATS Category IV – Handling During Ante-mortem Inspection

At approximately 1000 hours while performing HATS Category IV – Handling During Ante-mortem Inspection, I observed the following non-compliance: I observed a dairy cow with a five-centimeter wound on her right rear flank that appeared fresh and was actively bleeding. Once all 5 head of dairy cows were removed from pen 5, I requested to review the pen. On the north side wall, I observed a rusted gate post with adhered hair and fresh blood. The edges of the rusted post were sharp when touched. The sharp edge was approximately two-meters off the ground, was approximately three-centimeter in length and matched the height of the wound on the dairy cow. I verbally notified Ms. Smith, Establishment Owner, of the non-compliance with regulation 9 CFR 313.1(a) with regards to poor pen maintenance that led to animal injury. Ms. Smith stated they would not be able to repair the pen immediately, so I placed U.S. Reject tag number B40682148 on the pen. I verbally notified Ms. Smith of the forthcoming non-compliance and the regulatory control action taken.

HATS Category V – Handling of Suspect and Disabled

At approximately 1445 hours while performing HATS Category IV – Handling During Ante-mortem Inspection I observed the following non-compliance with HATS Category V – Handling of Suspect and Disabled Animals: At approximately 1000 hours, Dr. Jones, Inspector-In-Charge had identified a U.S. Suspect (M-1234567) beef cow with back-tag number 41DL 2468. The establishment had separated the cow from other animals in pen 6 which was not a covered pen as required by regulation 9 CFR 313.1(c) and 313.2(d)(1). It was sunny, hot, (108 degrees Fahrenheit according to the establishment's outside thermometer) and humid. The cow was laying laterally on her right side, breathing irregularly, and her tongue was hanging out of her mouth. Dr. Jones was notified of the findings and requested that the establishment take the animal's temperature, which was 105 degrees Fahrenheit. Dr. Jones notified Mr. Smith, Barn Supervisor, of the findings and Mr. Smith elected to euthanize the animal. I observed the animal humanely euthanized and prior to removal from the pen, slashed and denatured. I had the establishment place U.S. Condemn tag number Z-7654321 in the animal's ear prior to removal and remove the U.S. Suspect tag. I verbally notified Mr. Smith of the forthcoming non-compliance record.

HATS Category VI – Electric Prod/Alternative Object Use

At approximately 1030 hours while performing HATS Category VI – Electric Prod/Alternative Object Use, I observed the following non-compliance: As I entered the pen area, I observed an establishment employee near the restrainer driving a sow with a hand-held battery powered electric prod. The sow was balking at the entrance to the restrainer and the employee shouted at the animal to move. When the animal would not move, the employee placed the electric prod on the rear of the animal and pushed the button four times in quick succession. The animal vocalized but did not move forward. The employee placed the electric prod on the rear of the animal again and pushed the button four times in quick succession. The animal again vocalized but did not move forward. The employee then used profane language and yelled at the animal to move forward and appeared to be in the process of using the electric prod again when I requested that he discontinue the use of the prod. I placed U.S. Reject tag number B19283746 on the restrainer and requested Ms. Smith, Slaughter Supervisor, come to the restrainer. I verbally notified Ms. Smith of my observations of non-compliance with regulation 9 CFR 313.2(b) and the excessive use of the electric prod on the sow. Ms. Smith had the employee driving hogs removed from the area. Ms. Smith identified and removed a white wash towel that had been draped over the front of the restrainer and requested that she try to move the sow forward into the restrainer.

After further verbal preventative measures were given, I removed by the regulatory control action and the sow was moved forward and humanely stunned without further incident. I verbally informed Ms. Smith of the forthcoming non-compliance record.

HATS Category VII – Observations for Slips and Falls

At approximately 0730 hours, while performing HATS Category VII –Observations for Slips and Falls, I observed the following non-compliance: An establishment employee was driving five steers from pen 2 to the holding pen. Three of the five steers were observed to slip and then fall after being moved around a right hand-turn between the pens. All three animals rose and appeared unharmed and continued to walk into the holding pen area. After the area was clear and safe to observe, I noted an area approximately two-meters in radius of ice and manure build-up at the area where the steers fell. I notified Mr. Smith, Slaughter Supervisor, of the ice and manure build-up and my observations of the movement of animals around the right-hand turn and tagged the alleyway prior to the holding pen with U.S. Reject tag number B66468123. Mr. Smith scraped the ice and manure away and added salt and hay to the area to improve footing and stated they would minimize the use of that area due to the sharp corner. After verbal preventative measures were given and the area verified as compliant, I removed the regulatory control action. I verbally notified Mr. Smith of the forthcoming non-compliance record in regard regulations 9 CFR 313.2(b) and 9 CFR 313.2(d).

HATS Category VIII – Stunning Effectiveness

At approximately 0915 hours, while observing HATS Category VIII – Stunning Effectiveness, I observed the following non-compliance: A stunning employee attempted to stun a lamb with a hand-held captive bolt device. The first attempt was ineffective as the lamb remained conscious. The lamb remained standing, was tracking the stunning employee with its eyes and moving its head away from the employee. The lamb vocalized immediately after the captive bolt contacted the head. There was a wound observed on the head of the lamb approximately three-centimeters above the half-way point between the eyes and blood was observed coming from its nose. The stunning employee immediately and effectively re-stunned the lamb with a pre-loaded hand-held captive bolt device resulting in an unconscious lamb. I placed U.S. Reject tag number B91827364 on the restrainer and verbally discussed my observations with Mr. Smith, Establishment Owner.

After Mr. Smith provided verbal preventative measures I removed the regulatory control action. I verbally informed Mr. Smith of the forthcoming non-compliance record and that the establishment failed to render the animal immediately unconscious with the first application of the stunner and failed to meet the regulatory requirements of 9 CFR 313.15(a)(1).

HATS Category IX – Check for Conscious Animals on the Rail

At approximately 1235 hours while performing HATS Category IX – Check for Conscious Animals on the Rail, I observed the following non-compliance: a shackled butcher hog that seemed to be vocalizing and blinking. I moved closer to inspect further. I found the animal had rhythmic breathing, eye tracking, and displayed the righting reflex. I determined that this animal was still conscious and notified plant personnel and management immediately. The animal was stunned again with a captive bolt device and rendered unconscious. I placed U.S. Reject tag number B23747923 on the rail. I contacted the district office with the information regarding this egregious event as defined in the humane handling directive for the DM's assessment. I verbally notified Mr. Smith, Establishment Owner, of the non-compliance with regards to consciousness on the rail and the forthcoming non-compliance and with the explanation for the regulatory control action taken. I informed him of the DM's impending assessment of this egregious event.

HATS Category IX non-compliance is due to animal(s) regaining consciousness which are egregious and would result in further enforcement action (NOS or a NOIE in lieu of a NOS).

Sample GCP Poultry NR

At approximately 1530 hours, while performing a Good Commercial Practices verification task, I observed the following non-compliance with regulation 9 CFR Part 381.65(b): At 1530 hours, the inspector at Inspection Station number 1 identified five cadaver birds without a bleed cut on the neck. I presented the cadavers to Mr. Smith, Evisceration Supervisor and then preceded to the re-hang area and noted twenty cadavers on the re-hang table without a bleed cut on the neck and an additional fifteen cadavers in a U.S. Condemn barrel next to the re-hang table that did not have a bleed cut on the neck. I preceded to the area just prior to the scalding and noted five additional birds enter the scalding still breathing and conscious. These birds did not appear to have a neck cut. I then preceded to the kill line and found no back-up cutter present at the station located just past the automatic knife. Additionally, stunned birds were passing through the automatic

knife cut without the neck being cut and some birds were passing above the blade not stunned. I requested that Mr. Smith immediately stop the kill line and placed U.S. Reject tag number B15759535 to the hanging area. Mr. Smith and additional supervisors adjusted the stunner and the automatic knife to ensure proper stunning and bleed cuts as well as added additional back-up employees after the automatic knife. Any birds prior to the scalding that were still conscious, breathing or did not have bleed cuts were cut and bleed out and returned to the line. Mr. Smith confirmed an additional forty cadavers were condemned per regulation 9 CFR Part 381.90. After corrective actions and preventative measures were reviewed, I removed the U.S. Reject tag from the hanging area and the line was allowed to restart.

- Enter evaluation feedback of DEOV from both the establishment management official and the DVMS in the survey on the DVMS SharePoint site (Appendix 2 on page 21).

Follow-up Action Items

- Provide additional or follow-up information and resources as needed based on site visit discussion.

NOTE: The DVMS has flexibility to assign/change a planned HHVV/GCPVV to a DEOV when conducting assessment visits to small and very small establishments, if the occasion arises. For example, if a HHVV/GCPVV is scheduled and for some reason no animals are present for slaughter, at the consent of establishment management, the DVMS could conduct a DEOV.

Appendix 6: Pilot Outreach Program (POP)

Pilot Outreach Program (POP)

Background/Participation

The POP visit framework was developed to test the one-on-one outreach approach to humane handling in small and very small establishments outlined in the FSIS Annual Plan FY 2019 linked to the Strategic Plan FY 2017–2021. The purpose was to assess the processes developed for the DEOV.

- District Office (DO) Participation – 3 Districts and 5 DVMSs were chosen to participate in the POP to provide a small test group of locations. DVMS volunteers were based on participation in the development of the outreach program.
 - Raleigh District Office (DO80)
 - Dr. Travis Auxier
 - Dr. Arial Thompson
 - Des Moines District Office (DO25)
 - Dr. Renee Larson
 - Dr. Claire Hotvet
 - Dallas District Office (DO40)
 - Dr. Adil Abdalla
- Establishment Selection - 11 establishments participated in the POP. Selections were made to include both small and very small establishments to determine if there are any significant differences in outreach effectiveness.
 - DO80 Raleigh
 - M5911 A & M Packing
 - M5439 Kleemeyer & Merkel, Inc.
 - M3940 Fauquier's Finest
 - M8496 Central Meat Packing
 - DO25 Des Moines
 - M7627 North Dakota State University Meat Laboratory
 - M19717 Lynch BBQ Company
 - M34283 Custom Meats of Marathon, Inc.
 - M1361 VPP Group, LLC
 - DO40 Dallas
 - M13324 K & C Meat Processing
 - M21179 J & J Packing Co., Inc.
 - M34660 Tran Meat Corporation

POP Visit Procedures

The outreach activities and resources used may vary depending on the individual establishment's pre-visit data review and/or requests from establishment management. Overall, the one-on-one visits should follow the approach outlined below.

- Pre-visit Data Review
 - Review establishment information since the previous DVMS HHVV/GCPVV documented in PHIS. DVMS will review PHIS and local files to identify trends through HHEAs, HHNRs, HHMOIs, LOCs, etc.
 - Contact establishment management to set-up a mutually agreed upon time and location for the DEOV.
 - DVMS is to ask the establishment if they have any specific topic requests and if they have a format preference (electronic documents, paper copies, PowerPoint presentations, etc.).
 - Contact FLS and IPP to check for any establishment-specific concerns.
- Outreach Visit Component
 - Introduction and Explanation of a DEOV as opposed to the HHVV/GCPVV.
 - Review/Explanation of relevant information in the FSIS Directive
 - Explanation of how “adequate” restraint, or lack thereof, has been identified and associated with trends in HHNRs and HHEAs.
 - Explanation of how the regulated industry’s stunning decisional methodology (especially in small and very small establishments) has been associated with trends in HHNRs and HHEAs.
 - Complete a walk-through of the facilities related to humane handling.
 - Review/Explanation of how OFO considers the issuances of HHMOIs, weekly meeting MOIs, HHNRs, and HHEAs as providing communication and part of Due Process as required by regulation 9 CFR Part 500.
 - Explanation of the various aspects of HHEAs (NOIE versus NOS and NROS, etc.).
 - Steps/Progression of events from time of notification of an incident, mitigation of enforcement action, verification period, and closeout procedures, including expected timeframes.
 - Explanation of the Agency’s position on establishments with repetitive HHEAs for same/similar causes (referral to ELD).

- Additional topics if requested by the establishment either during the initial contact or during the course of discussions.
- RSA discussion/review in light of covered topics.
- Ask for feedback of visit from establishment.
 - Usefulness, material format, etc.
- Post Outreach Visit Actions
 - Complete Report in PHIS:
 - Complete data entry in PHIS for FSIS Form 6000-31 for livestock and/or FSIS Form 6000-32 for poultry;
 - Under Reason for Visit (Box 12) - Check "Special Correlation/Other" and type "Outreach" in the Other Reason text box;
 - List personnel present during discussion in Box 15 (Narrative - Correlation);
 - Document topics discussed in Box 15 (Narrative - Findings); and
 - Document resources shared in Box 15 (Narrative - Findings).
- Outreach Analysis
 - Provide feedback to the workgroup, both personal experience and from establishment management.
 - Develop summary analysis from the POPs.
 - Modify the plan/resources as needed.
 - Track DEOV data as part of annual and strategic plan reporting.

POP Analysis

Background: As the Outreach Workgroup worked to develop the DEOV Plan we wanted to ensure that our process would be effective and functional. In that vein, we did a pilot project to assess the DEOV process developed for this plan. The analysis below outlined what worked, what could use improvement, and lessons learned. We took those lessons and made changes to the process to advance the methodology.

What Worked Well in Executing the POP Visit?

- Calling in advance helped in the explanation of the visit purpose, set-up date and time for the visit, and allowed meeting and discussion with the appropriate management personnel available on the day of the visit.
- Outreach discussion was generally well received. Discussions included humane handling regulations, other related FSIS policies and most causes of humane handling non-compliance.
- Resource material was provided including a DVD copy of resource material. Some pilot establishments were provided paper resources. There were others that had a RSA program and had no interest in any additional humane handling materials.

- Walking through the establishment during slaughter operations eased the discussion about the most vulnerable areas, potential humane handling violations, different preventive measures, and areas for improvement.
- Outreach visits performed as part of the POP experience felt more relaxed for the DVMSs.

What Did Not Go Well During the POP Visit?

- One establishment was apprehensive on doing an outreach visit. They had no interest in doing a walk-through of the facility with the DVMS but did provide time for a discussion on humane handling, which centered on big picture items and how districts operate differently across the country. This establishment has a RSA program.
- One establishment owner had minimal interest in the DEOV, stating they “heard it all before.”
- Some managers stated they did not see the difference between the DEOV and the routine HHVVs/GCPVVs. Some stated that the same discussion/conversations are done during the routine HHVV/GCPVV assessment.
- There was a statement that the Agency is wasting too much time and resources on animal welfare, rather than food safety.

What Were the Lessons Learned?

- Even though the DVMS called and scheduled the visits in advance, they did not get any requests for information prior to the visit, or any specific questions generated during the visit. The advanced call is still productive, as most establishments stated they would talk with their teams prior to the visit and see if they had any animal welfare topics of concern.
- Very small establishments seemed to be more apprehensive on bringing up questions or concerns.
- The outreach in the majority of visits was well received, even if the owner/management did not feel as though we could offer them any useful information.
- Speaking candidly and plainly with owners/management on humane handling in general did generate some input from the establishments on improvements specific to their facility.

- At the small establishment with a RSA in place, management was quite candid on the importance of good communication with the assigned in-plant team, but they had concerns on how humane handling tasks are done and enforcement actions are taken in small versus large establishments.
- There is a general consensus from a noteworthy portion of the establishments participating in the POP, that the DEOV is more of the same type of information given during the outreach component of the routine HHVV/GCPVV.
- Outreach should be targeted to the most vulnerable establishments with repeated and/or increased number of humane handling violations.

What Impact Does This Have on the DVMS Methodology for executing DEOV Goals?

- DEOV should be done per request, for new establishments, and to target establishments identified by the DO as most vulnerable, with repeated and/or increased number of humane handling violations or GCP concerns.
- The DEOV should be documented in much the same way that traditional DVMS HHVVs/GCPVVs are documented, in PHIS, but identified as "Outreach".
 - Information reviewed in advance of a DVMS HHVV/GCPVV is the same information reviewed for the DEOV.
 - A walk-through of the facility proved very helpful even when no animals were present.
 - Additional information in the DEOV report would include topics of discussion (without specific information about the establishment, as this could be proprietary) and resources provided and/or requested by owner/management.
- DVMS follow-up should be performed on an as-needed basis:
 - Must follow-up with establishments that request additional resources.
 - Any other follow-up requests should be done at a higher level (District Manager [DM] or Headquarters [HQ]).

- Tracking the DEOV can be accomplished by the DVMS in each individual District. A District summary at the end of each FY would provide HQ with an overall sense of how many DEOVs are being performed.

Conclusion/Next Steps

- Overall, the POP visits were helpful and sharing of resource material, even if not requested, is proactive on the Agency's part. Even in establishments where the owner/management stated that this was redundant information, the communication bridges built were supportive.
- Encourage establishments to participate in Industry and/or Agency meetings and voice their opinions.
- Strongly suggest considering regional outreach meetings (e.g., district town hall) or in conjunction with some other event. For example, in the Des Moines District, the Enforcement Investigations Analysis Officers (EIAOs) work with universities (Iowa State University, the University of Minnesota, the University of Wisconsin, and South Dakota State University) on yearly food safety summits. DVMSs can be proactive in seeking a window of time at these types of meetings to talk about humane handling/GCP outreach.
- Work with the FLSs on participating in a walk-through for the start-up of a new slaughter establishments or have the first DVMS visit focus more on outreach than regulatory verification.
- Reassess the DEOV process to ensure we are making the most impact after the first year and then as needed.
- Ensure that the DVMS has flexibility to assign/change a planned HHVV/GCPVV to a DEOV when conducting assessment visits to small and very small establishments, if the occasion arises. For example, if a HHVV/GCPVV is scheduled and for some reason no animals are present for slaughter, at the consent of establishment management, the DVMS could conduct a DEOV.
- The Outreach Workgroup acknowledges that as a voluntary program there may be low participation. We suggest tracking in the evaluation/feedback survey on the DVMS SharePoint site that the outreach contact be noted and that the offer was declined. We can then use that data in the review of this program.

USDA