Appendix G

Comprehensive Review and Determination Report

Fiscal Year 2021

Iowa

Federal-State Audit Staff
Office of Investigation, Enforcement and Audit
Food Safety and Inspection Service
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Purpose
This report communicates the United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS), Office of Investigation, Enforcement and Audit (OIEA), Federal-State Audit Staff’s (FSAS) annual review results and determination for the Iowa Meat and Poultry Inspection (MPI) program and presents an overview of the review methodology used for determining if the State MPI program is “at least equal to” FSIS’ MPI program.

Description of Iowa’s MPI Program
The Iowa Department of Agriculture and Land Steward, Meat and Poultry Inspection Bureau (IDALS, MPIB) administers the Iowa MPI program under authority of Iowa Code (Chapter 189A). The program verifies compliance and enforces regulatory requirements at 54 inspected facilities and 79 custom exempt establishments.1 In addition, IDALS, MPIB provides inspection at seven facilities in the Federal-State Cooperative Agreement Inspection Program.2

Annual Determination
FSIS determined that IDALS, MPIB is operating a meat and poultry inspection program “at least equal to” the Federal requirements. This determination was based on: (1) FSIS’ annual desk review of the self-assessment documents, and (2) FSIS’ onsite review. This determination is fully explained in the sections entitled “Part I – Self-Assessment Review” and “Part II – Onsite Review.”

Part I. Self-Assessment Review
Part I includes the following:
• Description of the Self-Assessment Review Methodology followed for all State MPI programs;
• Review of Iowa’s Self-Assessment Submission; and
• Self-Assessment Determination for Iowa.

Self-Assessment Review Methodology
The annual self-assessment process is designed for each State to provide sufficient information to adequately demonstrate their administration of an “at least equal to” State MPI program. The review objective is to determine whether a State continues to administer an MPI program that meets Federal standards set for ensuring meat and poultry products are safe, wholesome, unadulterated, and correctly labeled and packaged. Each review cycle, State MPI program officials are to complete and submit self-assessment component surveys, supporting documentation and other self-assessment instruments to FSIS in accordance with the State

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1 Custom exempt establishments are slaughter and processing establishments that are not subject to the routine inspection requirements of the Federal Meat Inspection Act (FMIA) and the Poultry Products Inspection Act (PPIA), provided the specified operations meet the exemption requirements (21 U.S.C. 623 and 464).

2 Facilities operating under the Federal-State Cooperative Agreement Inspection Program (FSCIP), also known as Talmadge-Aiken establishments or cross-utilization facilities, are under Federal inspection, but operate with State inspection personnel. As a result, these facilities are not reviewed as part of the State MPI program review. However, since State inspection personnel staff these establishments, the number of these establishments is applicable to determinations on Component 4 – Staffing and Training.
Reporting and Communication Tool User Guide and FSIS “At Least Equal To” Guideline for State Meat and Poultry Inspection Programs.

FSIS begins the annual comprehensive review by assembling a review team comprised of subject matter experts from various FSIS program areas to review the nine components of the comprehensive review process. The review team, comprised of Agency representatives from the Federal-State Audit Staff (FSAS); the Civil Rights Staff (CRS); Financial Reviews and Systems Branch (FRSB); Laboratory Quality Assurance Response and Coordination Staff (LQARCS); and other program areas, as needed, evaluates each State MPI program’s self-assessment submission to determine whether it meets the “at least equal to” criteria for all nine review components. During the desk review process, the Office of Policy and Program Development and the Office of Field Operations are consulted as needed to gain context and perspective on current FSIS programs, policies, and procedures when determining whether a State MPI program meets Federal “at least equal to” standards.

If questions arise during the desk review or if additional documentation is needed to make a review determination regarding one or more components, FSIS will request clarifying information from the State MPI program. Upon completion of the desk review, FSIS makes one of the following three determinations for each component and for the non-designated3 State’s overall ability to maintain an MPI program “at least equal to” the Federal requirements:

1. “At Least Equal To” means the State MPI program has adopted laws, regulations, and programs, and implemented them in a manner that is “at least equal to” FSIS’ Federal inspection program for all review components.
2. “At Least Equal To” with Provisions means FSIS makes a provisional determination of the State MPI program’s “at least equal to” status provided the program takes additional action to resolve review findings.
3. Not “At Least Equal To” means the State MPI program has not adopted laws, regulations, or programs, or does not implement them in a manner that is “at least equal to” FSIS’ Federal inspection program for one or more of the review components.

Review of Iowa’s Self-Assessment Submission
FSIS evaluated the self-assessment documents for the nine review components to determine whether IDALS, MPIB constitutes an inspection program “at least equal to” the Federal program. The determination and rationale for each review component are listed below.

FSAS received IDALS, MPIB’s self-assessment submission for components 1 through 6 on March 2, 2021. FSAS sent a notification to IDALS, MPIB requesting additional information. IDALS, MPIB sent additional information clarifying their self-assessment submission and all supplementary information requested. FSAS reviewed the submitted clarification items, and accepted the requested information on March 9, 2021.

3 Non-designated is a State that operates an MPI program under a cooperative agreement with FSIS. The State MPI program must administer inspection and food safety requirements “at least equal to” those imposed under the Federal Meat Inspection Act, Poultry Products Inspection Act and Humane Methods of Slaughter Act of 1978.
Component 1 – Statutory Authority and Food Safety Regulations
FSAS compared the submitted self-assessment and supporting documentation to the legal authority provided under the FMIA, PPIA, and the Humane Methods of Slaughter Act (HMSA), and the regulations promulgated under these laws. The supporting documentation included the Iowa Code (Chapter 189A), which may be cited as the Meat and Poultry Inspection Act, and the Iowa Administrative Code (Chapter 76). The Iowa Code provides authorities for mandatory ante-mortem and post-mortem inspection, reinspection, sanitation requirements, record keeping requirements (Section 189A.5), and humane methods of slaughter requirements (Section 189A.18).

In addition, the Iowa Code provides authorities that are “at least equal to” the FMIA and PPIA regarding adulteration and misbranding (Section 189A.2), prohibited acts (Section 189A.8), access and examination (Section 189A.11), and product control actions (Section 189A.12). It also includes sufficient authorities for criminal, civil, and administrative sanctions to address violators.

The Iowa Code grants the authority to promulgate rules and regulations (Section 189A.13). Iowa adopts by reference parts 301, 303, 304, 305, 306, 307 (with exceptions), 308 through 320, 325 (with exceptions), 329, 332, 381 (with exceptions), 412, 416–418, 424, 430, 431, 441, 442, and 500 (with exceptions) in the Iowa Administrative Code (Sections 21–76.1 through 21–76.3).

In conclusion, IDALS, MPIB provided evidence showing that it operates under State laws and regulations that provide legal authority “at least equal to” that provided under the FMIA, PPIA, and HMSA, and the accompanying regulations.

Component 2 – Inspection
FSAS compared the self-assessment submission and supporting documentation regarding inspection policies and procedures and regarding verification of establishments’ compliance with the Federal requirements. IDALS, MPIB uses the FSIS Public Health Information System (PHIS) to schedule inspection tasks and to collect, consolidate, and analyze inspection data. IDALS, MPIB administers inspection for any meat or poultry product intended for human consumption, wholly or in part, from the carcass or parts of any animal defined as “livestock” or “poultry” in the Iowa Administrative Code and governing rules and regulations. The State inspection program impose regulations and perform inspection duties that ensure animals that animals, intended to be used in meat and poultry products sold commercially, are slaughtered and processed in the presence of State inspection personnel, and the resulting meat food products are inspected and passed for human consumption. Furthermore, IDALS, MPIB administers a food safety verification program that meets the intent of FSIS Directive 5000.1., Verifying an Establishment’s Food Safety System. Food safety verification activities are performed to ensure establishments’ compliance with applicable pathogen reduction, sanitation, and the Hazard Analysis and Critical Control Point (HACCP) regulations.

In addition to performing inspections and food safety verifications, IDALS, MPIB schedules and performs a comprehensive food safety assessment (FSA) at each inspected establishment in accordance with FSIS Directives 5100.1, Enforcement, Investigations and Analysis Officer (EIAO) Comprehensive Food Safety Assessment (FSA) Methodology, and 5100.4, Enforcement,
Investigations and Analysis Officer (EIAO) Public Health Risk Evaluation (PHRE) Methodology. These FSAs examine the design and validity of establishments’ food safety systems, which include hazard analyses, HACCP plans, Sanitation Standard Operating Procedures (Sanitation SOP), prerequisite programs, sampling programs, supporting documentation and records, and any other programs that constitute the establishments’ food safety systems. The PHRE and FSA records support the conclusion that State inspection personnel recognize and document noncompliance and initiate appropriate regulatory actions.

IDALS, MPIB verifies establishment compliance with the non-food safety (i.e., labeling) consumer protection regulatory requirements. IDALS, MPIB uses applicable FSIS directives to instruct inspection personnel and uses PHIS to schedule ongoing verifications and document noncompliance. A thorough review of the PHIS data for a 12-month period supports the conclusion that IDALS, MPIB inspectors correctly apply the inspection methodology and document noncompliance.

IDALS, MPIB maintains a label approval policy and process to verify that labels are accurate and meet regulatory requirements. Prior to applying a label, mark, or device to an inspected meat or poultry product, an establishment representative must submit a completed application for Approval of Label Device (L2/3), Formulation and Processing Procedures Approval Form (T40/45), and a label sketch to obtain IDALS, MPIB approval.

IDALS, MPIB enforces the Iowa Administrative Code, which adopts by reference 9 CFR Part 500, Rules of Practice, when establishments do not comply with State authorities that are “at least equal to” the FMIA and PPIA. The administrative enforcement policies include due process, regulatory control actions, withholding the marks of inspection, suspension of inspection activities, and withdrawal of inspection. IDALS, MPIB maintains procedures to document relevant facts of administrative actions and ensure that administrative actions are legally supportable and based on relevant facts.

The submitted documents support the conclusion that IDALS, MPIB:

- Performs inspection and regulatory verification procedures to confirm that State-inspected establishments comply with applicable regulations;
- Maintains a system to carry out administrative enforcement actions when establishments do not comply with State authorities that are “at least equal to” the FMIA and PPIA;
- Conducts inspection activities “at least equal to” the Federal requirements; and
- Monitors these activities through control measures to verify that the inspection system functions as intended.

Component 3 – Sampling Programs
FSIS compared IDALS, MPIB’s sampling protocols, procedures, and results to Federal policies and procedures.

IDALS, MPIB provided documentation to demonstrate that it maintains sampling programs, based on sound rationale and goals, for the following:
• *Escherichia coli* (*E. coli*) O157:H7 in raw non-intact beef products and raw ground beef components;
• Non-O157 Shiga toxin-producing *E. coli* (non-O157 STEC) in beef manufacturing trimmings;
• *Listeria monocytogenes* (*L. monocytogenes*) and *Salmonella* in ready-to-eat products;
• *Salmonella* performance standards in raw classes of meat and poultry; and
• Other consumer protection standards.

The sampling plans include procedures for sample collection, sample integrity, and laboratory analysis. IDALS, MPIB developed policies to respond to positive results. These policies include actions to prevent adulterated product from entering commerce. IDALS, MPIB participates in the FSIS National Residue Program and collects and analyzes inspector-generated samples for violative drug residues.

In conclusion, a detailed review of the sampling protocols, procedures, and results confirmed that IDALS, MPIB maintains verification testing to address adulterants, other measures of properly operating food safety systems, and other consumer protection standards “at least equal to” the Federal requirements. IDALS, MPIB also has control measures in effect to confirm that its product sampling system functions as intended.

Component 4 – Staffing, Training, and Supervision

IDALS, MPIB developed methods to determine staffing requirements. The requirements consider each inspector’s workload and the number of inspectors required to provide daily inspection coverage in each establishment on days when the establishment produces products bearing the State mark of inspection. Procedures are in effect to document staffing in each establishment, identify failures to meet staffing requirements, and correct staffing deficiencies. Supervisors assigns the inspectors’ work schedules weekly, with instructions for daily visits to operating establishments. Inspectors complete and submit weekly activity reports. The supervisors review the activity reports to verify daily inspection coverage and arrange relief inspection during routine and emergency leave situations.

At the start of the FY 2021 review cycle, IDALS, MPIB indicated they employ 1 bureau chief; 2 administrative staff; 23 inspectors; 4 veterinary medical officers; 1 enforcement, investigations, and analysis officer; and 2 compliance officers.

IDALS, MPIB continues to implement a training program for new entry-level inspection personnel. The training covers basic slaughter techniques and all inspection techniques required to perform slaughter duties, including basic Sanitation SOP and HACCP procedures. IDALS, MPIB maintains a recordkeeping system to verify completion of training by their inspection staff. The International HACCP Alliance approved the basic HACCP training, which is provided through a partnership with Iowa State University Meat Extension. New entry-level inspectors receive on-the-job training with experienced staff until formal training is available and before working on their own.
IDALS, MPIB incorporates the guidance in FSIS Directive 4430.3, In-Plant Performance System (IPPS), to set performance standards, and complete and record ongoing performance evaluations. In addition, IDALS, MPIB mandates a performance plan and evaluation system for all State employees. This system communicates to its employees their work responsibilities, performance goals and objectives, and the results of their annual performance evaluations.

After thorough review of the submitted documents, FSAS concluded IDALS, MPIB has sufficient resources to provide the required inspection coverage at State-inspected establishments to ensure that only safe, wholesome, unadulterated, and properly labeled meat and poultry products receive the State mark of inspection. The information supports the conclusion that inspection personnel have the education and training needed to apply IDALS, MPIB inspection methodology, to document findings, and to initiate regulatory actions when necessary. Control measures are in effect to confirm that IDALS, MPIB staffing and training systems function as intended.

Component 5 – Humane Handling

IDALS, MPIB schedules and performs regulatory verification procedures to assess whether establishment personnel humanely handle all livestock throughout the time the livestock are on official establishment premises, and it takes appropriate regulatory action in response to noncompliance.

IDALS, MPIB uses FSIS Directive 6900.2, Humane Handling and Slaughter of Livestock, to communicate instructions to inspection personnel. Inspectors document humane handling verifications in PHIS and submit reports to Veterinary Area Supervisors. As part of the management control system, IDALS, MPIB reviews these reports to verify that humane handling verification tasks are performed each day an establishment slaughters livestock. Veterinary area supervisors compile the total time the inspection staff spends performing humane handling verification activities, summarize the monthly data for each slaughter establishment, and submit this monthly data to the bureau State office. IDALS, MPIB veterinary medical officers perform annual humane handling reviews at slaughter facilities in accordance with FSIS Directive 6910.1, District Veterinary Medical Specialist (DVMS) - Work Methods.

In conclusion, the information supports the fact that IDALS, MPIB verifies compliance with the humane handling requirements and takes regulatory action “at least equal to” the Federal program. Control measures are in effect to confirm that the humane handling verification system functions as intended.

Component 6 – Compliance

IDALS, MPIB personnel conduct in-commerce surveillance of persons or firms that prepare, transport, sell, or offer for sale meat and poultry products in intrastate commerce to verify compliance with State statutory and regulatory requirements, and to verify that meat and poultry products in intrastate commerce are wholesome; correctly packaged and labeled; and are secure from threats or intentional acts of contamination.

IDALS, MPIB investigates alleged or actual statutory or regulatory violations; controls products when there is reason to believe that the products are adulterated, misbranded or otherwise in
violation of the Iowa Code; and takes enforcement action, when needed, up to and including prosecution of individuals or firms that have violated the Iowa Code. IDALS, MPIB has procedures to maintain and preserve the legal integrity of documentary and other evidence to support legal action, and to report transportation accidents that involve State-inspected and passed meat and poultry products.

IDALS, MPIB management reviews all compliance reports for correctness, extracts pertinent information for reporting purposes, enters this information in a database, and files the hard copies. The program director reviews all violations and relevant evidence, and then determines the appropriate case disposition and course of action.

IDALS, MPIB maintains procedures for the recall of meat and poultry products subject to its jurisdiction that are “at least equal to” the procedures described in FSIS Directive 8080.1, Recall of Meat and Poultry Products. These procedures include health hazard evaluation, recall classification, public notification, effectiveness checks, and closure. Firms are to notify IDALS, MPIB within 24 hours of initiating a recall. IDALS, MPIB oversees the recall activities, coordinates actions to determine whether adulterated product was removed from commerce, and issues news releases as necessary to serve the interest of public health.

IDALS, MPIB established methods to record, triage, analyze, and track consumer complaints related to State-regulated meat or poultry products. Compliance personnel either investigate these complaints or refer them to the local health authority. The investigative methods include procedures for collecting and safeguarding evidence; conducting interviews; submitting product samples to the laboratory; initiating recall procedures and/or regulatory and enforcement actions; and reporting potential food safety threats.

IDALS, MPIB has a system for reviewing custom exempt operations that is in accordance with FSIS Directive 8160.1, Custom Exempt Review Process. Iowa’s in-plant inspector performs quarterly risk-based inspection of custom establishments, using the risk-based inspection to document findings. Categories 2, 3, and 4 are “passing” reviews, and the establishment will continue to receive quarterly, routine visits. Category 1 reviews are “failing” reviews and will result in progressive enforcement actions.

The submitted documents support the conclusion that IDALS, MPIB maintains a system to verify compliance of meat and poultry products in intrastate commerce and takes appropriate enforcement actions in the event that adulterated or misbranded products enter intrastate commerce. Control measures are in effect to confirm that the compliance program functions as intended.

**Component 7 – Laboratory Methods and Quality Assurance Program**

OPHS conducted an onsite review of IDALS, MPIB’s laboratory for microbiological pathogens and food chemistry testing. OPHS evaluated the laboratory quality assurance (QA) and methods for IDALS, MPIB laboratory in conjunction with the onsite review, which is included in Part II of this document, Onsite Review.
Component 8 – Civil Rights
IDALS, MPIB submitted the required FSIS Form 1520-1, Civil Rights Compliance of State Inspection Programs, to demonstrate adherence to Federal civil rights laws and USDA civil rights regulations. On September 1, 2021, CRS concluded that IDALS, MPIB functions “at least equal to” the Federal civil rights requirements.

Component 9 – Financial Accountability
IDALS, MPIB submitted quarterly and final Financial Status Reports (SF-425), and the annual Indirect Cost Proposal to demonstrate it conforms to 7 CFR, Part 3016, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, and follows FSIS Directive 3300.1, Fiscal Guidelines for Cooperative Inspection Programs. As of October 30, 2021, FRSB determined that the Iowa MPI Bureau is “at least equal to” Federal standards for financial accountability for FY 2021.

Self-Assessment Determination for Iowa
Based on the evidence and review results described above, FSIS determined that IDALS, MPIB provided adequate documentation to show it is operating a meat and poultry inspection program “at least equal to” the Federal requirements.

Part II. Onsite Review

Part II includes:

- A description of the onsite review methodology followed for all State MPI programs;
- An onsite review of Iowa; and
- An onsite determination for Iowa.

Onsite Review Methodology
The onsite review determines whether the State implements its MPI program in a manner that is “at least equal to” the Federal inspection program and maintains program policies and procedures in accordance with those submitted in the annual self-assessment documents. The FSIS onsite review team is comprised of representatives from FSAS, CRS, FRSB, LQARCS, and other program areas as needed. FSIS Directive 5720.3, Methodology for Performing Scheduled and Targeted Reviews of State Meat and Poultry Inspection Programs, outlines the comprehensive State MPI program review process.

As the primary contact for State MPI program officials and FSIS review team members, the lead FSAS program auditor is to coordinate and track components 1 through 6 onsite review activities and to monitor the status of components 7 through 9 reviews through communications with LQARCS, CRS, and FRSB. The FSAS auditor schedules the onsite review, for components 1 through 6, with State MPI program officials. FSAS sends written notification to State MPI program officials at least 30 days prior to the start of the onsite review. LQARCS, CRS, and FRSB schedule onsite reviews of components 7 (laboratory methods and quality assurance program), 8 (civil rights), and 9 (financial accountability), respectively.
Upon completion of an onsite review, FSIS makes one of the following three determinations for each component and the State’s overall ability to maintain its MPI program “at least equal to” the Federal requirements:

1. “At Least Equal To” means the State MPI program has adopted laws, regulations, and programs, and implemented them in a manner that is “at least equal to” FSIS’ Federal inspection program for all review components.
2. “At Least Equal To” with Provisions means FSIS makes a provisional determination of the State MPI program’s “at least equal to” status provided the program takes additional action to resolve review findings.
3. Not “At Least Equal To” means the State MPI program has not adopted laws, regulations, or programs, or does not implement them in a manner that is “at least equal to” FSIS’ Federal inspection program for one or more of the review components.

**Onsite Review of Iowa**

FSIS analyzed all information gathered during the onsite review and IDALS, MPIB’s action plan, which addressed the findings identified during the review, to determine whether IDALS, MPIB has implemented and maintains its MPI program “at least equal to” the Federal requirements and was enforcing requirements “at least equal to” those imposed under the Federal acts. The determination and rationale for each review component are listed below.

FSAS conducted an onsite review of IDALS, MPIB, for components 1 through 6, March 22, 2021 to April 2, 2021. Based on records and procedures reviewed, FSAS determined IDALS, MPIB was able to confirm the program is being implemented as described in self-assessment.

**Component 2 – Inspection**

FSAS reviewed the conditions and documents onsite. The onsite documents reviewed included, but were not limited to, Sanitation SOP and associated records; HACCP plans and associated records; generic E. coli sampling procedures and associated records; procedures for the removal, segregation, and disposition of specified risk materials and associated records; custom exempt records; noncompliance records; and enforcement letters. In addition, FSAS reviewed the non-food safety consumer protection documents and procedures to determine whether IDALS, MPIB enforces non-food safety consumer protection regulatory standards “at least equal to” the Federal requirements. This review included, but was not limited to, ongoing regulatory verification tasks, label approvals, labels, and product formulations.

FSAS evaluated IDALS, MPIB during 10 establishment reviews. IDALS, MPIB personnel identified several establishment noncompliances during the onsite review, with the Sanitation SOP, Sanitation Performance Standards, HACCP design and validity, and non-food safety consumer protection requirements. The FSIS review team members identified that several establishments throughout the State did not have adequate decision-making documents to support the decisions in the hazard analyses. IDALS, MPIB officials initiated regulatory actions in the establishments and issued noncompliance records at the time the noncompliances were identified.
On June 4, 2021, IDALS, MPIB submitted an action plan to correct the findings identified during the review. The action plan identifies the underlying causes of both the system-wide findings and the specific findings at individual establishments, and includes a verification plan to ensure statewide correction of these findings. IDALS, MPIB concurred that validation data linking carcass temperatures to cooler temperatures would provide further support for establishments’ hazard analysis decisions regarding carcass chilling. IDALS, MPIB intends to produce and distribute (in collaboration with Iowa State Extension services) guidance to all official slaughter establishments on performing an in-house correlation of carcass temperatures to cooler temperatures. This validation data will be used to further support the conclusion of establishments that pathogen outgrowth during initial chilling of carcasses is not reasonably likely to occur. In addition, IDALS, MPIB provided evidentiary documents to demonstrate verification of establishment compliance with the regulatory requirements.

Component 3 – Sampling Programs
FSAS reviewed IDALS, MPIB’s product sampling documents, protocols, procedures, and results presented onsite. These included sampling plans and laboratory results for E. coli O157:H7 in raw non-intact beef products and raw ground beef components, non-O157 STEC in raw beef manufacturing trimmings, L. monocytogenes and Salmonella in ready-to-eat products, Salmonella performance standards in raw classes of meat and poultry, Campylobacter performance standards in raw classes of poultry, economic samples, violative drug residues, State laboratory activity reports, and sample seals. FSAS determined IDALS, MPIB was able to confirm the program is being implemented as described in self-assessment.

Component 4 – Staffing, Training, and Supervision
FSAS reviewed the staffing and training program onsite to assess whether IDALS, MPIB carries out its staffing, training, and supervisory systems consistent with the self-assessment documents and “at least equal to” the Federal requirements. After further analysis of data from the IDALS, MPIB office and establishment reviews, FSAS concluded that IDALS, MPIB has an adequate number of trained persons to provide the required inspection coverage in the establishments, perform compliance activities, and provide supervisory oversight, and has implemented procedures to ensure daily inspection coverage in operating establishments. Inspection personnel apply IDALS, MPIB’s inspection methodology and make decisions based upon the correct application of inspection methodology, document findings, and initiate regulatory action. The training program includes measures to ensure that inspection personnel receive training in the areas of meat and poultry ante-mortem and post-mortem inspection, humane handling, processed products, HACCP, Sanitation SOP, rules of practice, IPPS guidelines, compliance, and Inspection Methods training. No issues were identified with the staffing, training and supervision component at the State Office.

Component 5 – Humane Handling
FSAS reviewed the humane handling program and documents presented onsite to determine whether IDALS, MPIB adequately enforces the humane slaughter of livestock regulatory standards to ensure that animals presented for slaughter are humanely handled throughout the time they are on official establishment premises. These documents included, but were not limited to, noncompliance records and procedure schedules. FSIS reviewed humane handling of
livestock, stunning methods, and the condition of livestock pens, driveways, and ramps. No issues were identified with humane handling practices.

**Component 6 – Compliance**

FSAS conducted an onsite review of the compliance program activities and all specified documents to determine whether IDALS, MPIB implements a compliance program in accordance with the submitted self-assessment documentation. These included, but were not limited to, Reports of Investigation, Daily Activity Reports, Programmed Compliance Plans, Incident Reports, Case Reports, Reports of Apparent Violations, and Notices of Warning.

The review of compliance documents and case files support the conclusion that IDALS, MPIB follows the procedures and methods in FSIS Directive 8010.1, Methodology for Conducting In-Commerce Surveillance Activities, to assess food safety, food defense, non-food safety consumer protection, and compliance with administrative and judicial court orders in firms that prepare, transport, sell, or offer for sale meat and poultry products in intrastate commerce.

IDALS, MPIB investigates alleged or actual statutory or regulatory violations, as set out in FSIS Directive 8010.2, Investigative Methodology, and controls products when there is reason to believe that the products are adulterated, misbranded, or otherwise in violation of the Iowa Code. The Reports of Investigation were completed in accordance with FSIS Directive 8010.4, Report of Investigation. IDALS, MPIB uses the investigative findings and evidence to pursue enforcement actions for administrative, civil, or criminal sanctions.

IDALS, MPIB follows the recall procedures in FSIS Directive 8080.1, Recall of Meat and Poultry Products, with minor modifications fitting its organizational structure. Three State-inspected establishments or retail firms recalled product during FY 2021. IDALS, MPIB utilized the guidance found in Directive 8080.1 to guide recall actions. The Recall Committee consisted of compliance officers, EIAO, HACCP and labeling coordinator, and bureau chief. The Recall Committee, in consultation with the establishment and field staff, determined the types and amounts of product affected utilizing available records and observations. All products deemed potentially adulterated or misbranded were included in the scope of the recall.

IDALS, MPIB maintains a system to review, analyze, and triage consumer complaints. IDALS, MPIB gathers information pertinent to these complaints, directs the compliance division to investigate these complaints, and files completed investigation documents in the State office.

IDALS, MPIB has a system for reviewing custom exempt operations that is in accordance with FSIS Directive 8160.1, Custom Exempt Review Process. Iowa’s in-plant inspector performs quarterly risk-based inspection of custom establishments, using the risk-based inspection to document findings. Categories 2, 3, and 4 are “passing” reviews, and the establishment will continue to receive quarterly, routine visits. Category 1 reviews are “failing” reviews and will result in progressive enforcement actions. No issues were identified with the compliance program.
Component 7 – Laboratory Methods and Quality Assurance Program

An on-site audit of IDALS, MPIB was performed during FY21 to evaluate laboratory quality assurance programs and method equivalence under the State MPI Program.

IDALS, MPIB conducts microbiological testing for *Salmonella, L. monocytogenes, E. coli O157:H7, non-O157 STEC,* and *Campylobacter.* IDALS, MPIB conducts food chemistry testing for the measurement of moisture, protein, fat, and salt.

FSIS compared the IDALS, MPIB Laboratory Quality Assurance Program to the State Meat and Poultry Inspection (MPI) Program Laboratory Quality Management System Checklist and evaluated evidence of laboratory proficiency and analyst training. IDALS, MPIB met all Laboratory QA requirements.

IDALS, MPIB has demonstrated adequate food chemistry capability for the measurement of moisture, protein, fat, and salt. IDALS, MPIB has demonstrated adequate microbiological capabilities for detection of *Salmonella, L. monocytogenes, E. coli O157:H7, non-O157 STEC,* and *Campylobacter.*

Based on the Component 7 methods and quality assurance program review, Iowa may be eligible to perform inspection:

- At beef establishments producing raw ground beef and bench trim, and at beef slaughter establishments producing manufactured trim, provided the State collects and submits the appropriate number of samples that are tested for *Salmonella, E. coli O157:H7,* and non-O157 STEC.

- At “ready-to-eat” meat and poultry establishments, provided the State collects and submits the appropriate number of samples that are tested for *Salmonella* and *L. monocytogenes.*

- At poultry slaughter establishments, provided the State collects and submits the appropriate number of samples are tested for *Salmonella* and *Campylobacter.* MPI states with no participating facilities slaughtering at least 20,000 chickens and/or 20,000 turkeys per year are not required to test raw product for *Salmonella* and *Campylobacter* since it is not required at similar federally inspected plants. However, States should consider testing at a risk hierarchy that is commensurate with their establishment sizes and production volumes.

Component 8 – Civil Rights

In May 2021, FSIS-CRS conducted a civil rights compliance review of IDALS, MPIB (hereafter referred to as “the State”). The review was conducted to determine compliance with applicable civil rights statutes, USDA regulations, and FSIS policies, and where necessary, provide recommendations for program improvement. The review focused on the State’s compliance in eight areas: (1) Civil Rights Assurances; (2) State Infrastructure and Program Accountability; (3) Public Notification; (4) Civil Rights Complaints of Discrimination; (5) Civil Rights Training; (6) Disability Compliance; (7) Program Accessibility for Individuals with Limited English Proficiency; and (8) Compliance with the Age Discrimination Act of 1975.
The review consisted of telephonic interviews with the State’s chief/program manager and a sampling of establishment owners; a review of documents and information that were provided by the State or gathered from the State’s website; and a facility assessment. The last program review was conducted in July 2018, at which time the State was found to be in compliance with applicable laws and regulations.

Overall, the FY 2021 review found the State of Iowa to be in compliance with “at least equal to” standards for applicable civil rights laws, USDA regulations, and FSIS policies.

Notwithstanding this determination, the recommendations under Area 8 should be addressed and documentation demonstrating compliance provided to CRS. Actions taken to implement the recommendations must be documented in the State’s next annual self-assessment submission on FSIS Form 1520-1, Civil Rights Compliance of State Inspection Programs, due November 1, 2021.

Component 9 – Financial Accountability
FRAS did not conduct an onsite financial audit and compliance review of IDALS, MPIB in FY 2021. Therefore, the annual determination will be based on the self-assessment review results only.

Onsite Determination for Iowa
Based on the evidence and results discussed above, FSIS determined that IDALS, MPIB operates its MPI program “at least equal to” the Federal requirements for all review components and enforces requirements “at least equal to” those imposed under the Federal Acts.