

Public Health Risk Evaluation

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Public Health Risk Evaluation (PHRE) Background

- A decision-making process utilized to determine if the District Office (DO) needs to schedule an FSA or take enforcement action.
- PHRE is a separate activity from the FSA and will be completed prior to scheduling the FSA.
- PHRE's are an internal FSIS Document and is NOT shared with the establishment.

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PHRE/ FSA Scheduling

- Office of Planning, Analysis and Risk Management (OPARM) provides a prioritized list to DO for scheduling FSAs.
- The list is generated based upon available inspection data:
 - Public Health Triggers
 - Trends in Noncompliance Records/ Public Health Regulations
 - Recalls and Outbreaks
 - Production of adulterated product = positive FSIS sample results
 - ~~Outbreaks~~
 - ~~Date of last FSA~~

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PHRE/ FSA Scheduling

- The establishment's inspection data needs to be assessed. But it's only one part of the picture – here's where you come in to assess the establishment and make a recommendation.
- Many establishments are on the PHRE list based on noncompliance with Public Health Regulations (PHR).
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PHRE/ FSA Scheduling

- PHR non-compliance rates are calculated for each establishment monthly, and IPP will get an Early Warning alert when rates exceed the cut point.
- Establishments with a PHR NR rate exceeding the cut point will be included in the proposed “for cause” list.
- The list of PHRs is updated annually. <https://www.fsis.usda.gov/science-data/scientific-reports/public-health-regulations-phr/fsis-data-analysis-and-reporting-5>
- PHR Methodology:
 - <https://www.fsis.usda.gov/science-data/scientific-reports/public-health-regulations-phr>

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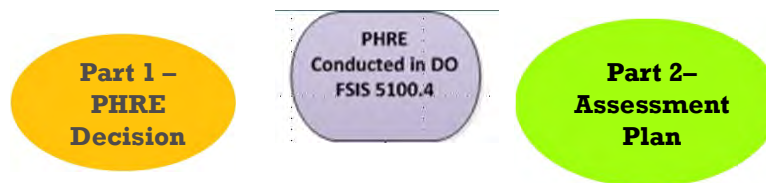
PHRE/ FSA Scheduling

- FSIS is actively working to better use data generated from the tasks to drive inspection decisions.
- The list isn't the only way the Agency identifies establishments. Districts may schedule for other reasons including:
 - Recommendations from field personnel
 - In response to changes in policy based on new or emerging public health-based information

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The PHRE– *Directive 5100.4*

- PHRE has two parts:
 1. A decision process to determine which action to take.
 2. An Assessment Plan, if an FSA is recommended.



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Part 1–Decision

- There are three possible decisions based on the PHRE
- The decisions must be documented in the PHRE tool
 1. Enforcement can be taken immediately based on the establishment's history
 2. An FSA should be performed to address vulnerabilities that can lead to adulterated or misbranded product
 3. No issue at the time



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Part 1–Decision



Part 1 – PHRE Decision

- Utilizing the PHRE Tool, you will:
 - Perform a PHRE review and evaluate relevant data. The tool is designed to help you gather and access the data gathered from all parts of the Agency (lab data, inspection data, IPP input).
 - Document recommendation
 - Conduct FSA (5100.1)
 - Do not conduct FSA, but take enforcement action (5100.3)
 - Do not conduct FSA, do not take enforcement action (5100.4)

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Part 1–Decision–Data Review



- Performing the PHRE Review
- Evaluate PHIS PHRE Report
 - Report generated from PHIS
 - Past FSAs
 - Enforcement Data
 - Compliance History
 - PHIS Profile Data
 - Weekly Meeting MOIs
 - Recall Information
 - Sampling Results
 - STEPs Information

The screenshot shows the 'Inventory of Standard Reports' page in the PHIS system. It includes a sidebar with navigation links like 'Establishment Profile', 'Storage Files', 'Inspection Identification', 'Sample Management', and 'Create Recall'. The main content area displays a table of reports with columns for Title, Date, and Actions. The table lists various reports such as 'Noncompliance Records for an Establishment', 'Inspection Tests', 'Recall Search by IRI Number', 'Inspection Tests', 'Mileman PHIS and PHIS for an Establishment', 'Inspection Tests', 'Pending Dispositions for an Establishment', 'Slaughter', 'PHIS Noncompliance for a Circuit', 'Inspection Tests', 'PHIS Noncompliance for an Establishment', 'Inspection Tests', 'Public Health Risk Evaluation for Establishment', 'Establishment Profile', 'Salmonella - Campylobacter Sensing Test Status and List for an Establishment', 'Lab Sampling', 'Sample Collection Status for a Circuit', 'Lab Sampling', and 'Sample Collection Status for an Establishment', 'Lab Sampling'.

Title	Date	Actions
Noncompliance Records for an Establishment		View
Inspection Tests		View
Recall Search by IRI Number		View
Inspection Tests		View
Mileman PHIS and PHIS for an Establishment		View
Inspection Tests		View
Pending Dispositions for an Establishment		View
Slaughter		View
PHIS Noncompliance for a Circuit		View
Inspection Tests		View
PHIS Noncompliance for an Establishment		View
Inspection Tests		View
Public Health Risk Evaluation for Establishment		View
Establishment Profile		View
Salmonella - Campylobacter Sensing Test Status and List for an Establishment		View
Lab Sampling		View
Sample Collection Status for a Circuit		View
Lab Sampling		View
Sample Collection Status for an Establishment		View
Lab Sampling		View

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Part 1–Decision–Data Review

- Performing the PHRE Review
 - Investigate and gather data and other background information
 - Use PHIS to generate the PHRE report
 - Testing Data from LIMS Direct
 - Consumer Complaints from CCMS
 - Previous FSAs not in PHIS
 - Additional Enforcement Records (AssuranceNet)
 - Whole Genome Sequence
 - Discuss compliance with:
 - FLS, CSI, DDM

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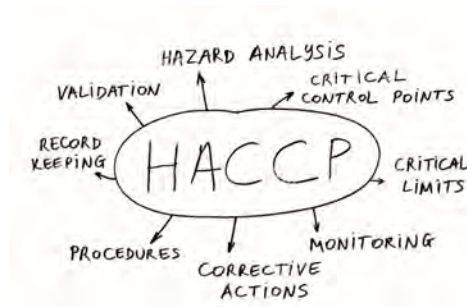
Analyze PHRE Data

1. Analyze and identify any trends in sampling results or in NRs.
2. Evaluate data looking for:
 1. Poor or worsening performance
 2. Evidence the establishment is not maintaining process control
 3. Insanitary conditions

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Part 1–Decision

- Documenting No Action:
 - The third outcome is that there is no action at this time. The rationale and explanation should also be documented on the PHRE. Support your decision with documentation from the PHRE.



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Part 2– Assessment Plan

- The PHRE, by design, is the first step needed to formulate the assessment plan. It is formulated prior to performing an FSA to help with planning of the FSA.
- PHRE assists the EIAO develop a plan to:
 - Ensure the FSA is thorough
 - Well organized
 - Promotes timeliness

**Part 2–
Assessment Plan
for
FSA**

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Part 2– Assessment Plan Contents

- Apparent Violations
 - Statement of possible food safety issues found.
 - Should contain relevant Statutes, regulations, etc.
- Scope of FSA
 - The extent and range of the FSA such as:
 - Tools, regulatory issues, food safety issues or other issues that will be addressed.
- Steps of assessment:
 - Steps to gather facts, findings and evidence to explore apparent/ possible food safety issues. The plan can change based on in-plant findings during the FSA.



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Objective Check-Up

1. What is the overall purpose of the PHRE?



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Objective Check-Up

1. What are the two parts of the PHRE?



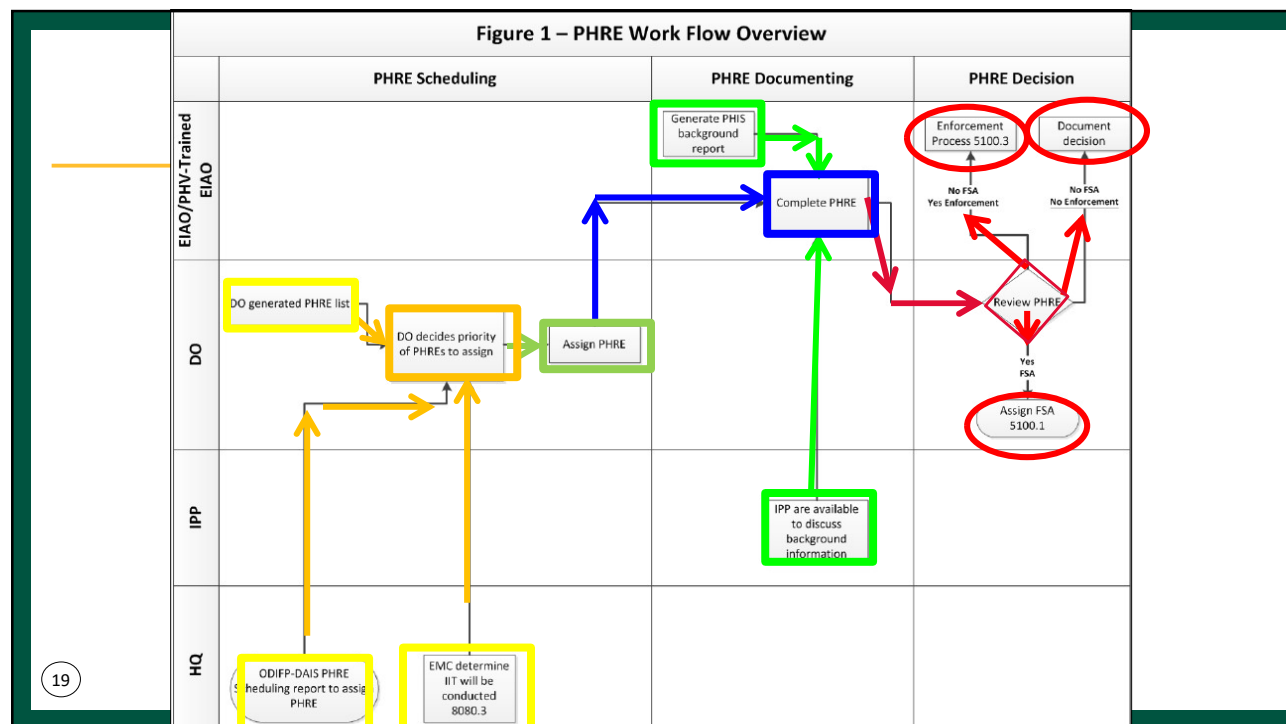
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Objective Check-Up

1. When is the PHRE tool to be completed.



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PHRE Tool

IMPORTANT NOTE:
THE PHRE IS AN INTERNAL DOCUMENT
AND IS **NOT** TO BE PROVIDED TO
ESTABLISHMENTS

1. Now let's look at the PHRE Tool

Public Health Risk Evaluation (PHRE) vs2

** For Internal Use Only – Do Not Distribute to Establishment **

The PHRE is a decision-making process that is to be used to determine whether the District Office needs to schedule a Food Safety Assessment (FSA).

*References:

[FSIS Directive 5100.4 Enforcement, Investigations and Analysis Officers \(EIAO\) Public Health Risk Evaluation \(PHRE\) Methodology](#)

[FSIS Directive 5100.1 Enforcement, Investigations, and Analysis Officer \(EIAO\) Comprehensive Food Safety Assessment \(FSA\) Methodology](#)

Establishment Information: (Name, Est. Number, Location, Email, Corporate Structure, and District/Circuit)

PHRE: Based on the analysis of the PHRE PHIS report (see [FSIS Directive 5100.4](#)), can the Agency take a supportable enforcement action immediately?

NOTE: If enforcement action will be taken, no FSA is necessary.

☐ Yes

☐ No

PHRE Workshop



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