

**National Advisory Committee on Meat and Poultry Inspection**  
**June 21-22, 2023**

**Subcommittee I: Outreach to Prospective Applicants**

**CHARGES: FSIS requested input from the Committee on ways to enhance outreach and engagement efforts to promote equity for new and existing establishments in underserved communities, while strengthening the food supply chain and ensuring compliance with food safety regulations. FSIS asked Subcommittee I to provide recommendations on outreach to prospective applicants for FSIS inspection.**

- **Question 1: What obstacles impede individuals in underserved communities from accessing FSIS' information resources?**
  - One type of obstacle that exists in more rural areas throughout the country is in actual access to information. This is partially due to a lack of availability of broadband internet access in some areas. There is also a lack of available local, in-person consultative services to connect underserved communities to FSIS information resources. Additionally, some underserved communities may have difficulty accessing information resources due to language barriers.
  - The second type of obstacle that exists is a lack of knowledge about where to start looking for resources or even knowledge about who needs inspection. There is a tremendous amount of information available online, but that can be overwhelming to someone who is not familiar with the industry.
- **Question 2: What barriers do individuals face when applying for FSIS inspection?**
  - The first fundamental barrier numerous individuals face when considering an application for inspection is a lack of access to capital. USDA attempted to address this barrier through grant programs. However, these grant programs all too often failed to reach underserved populations. The grant process was too complicated for many producers to successfully navigate, in some cases even being complicated enough to require businesses to obtain the services of a grant writer. This put many prospective businesses from underserved populations at a significant disadvantage in obtaining a grant. In addition, by targeting businesses classified as small or very small according to existing size classifications based on employee numbers, these grants all too often ended up being seized by larger establishments. This may have included businesses that are individually classified as small, but are actually owned by much larger umbrella corporations possessing greater resources and expertise to guide them through the grant application process.
  - The second fundamental barrier individuals face when applying for inspection is a lack of technical knowledge regarding what it takes to build and run a successful establishment. Many prospective businesses may not even know that they need inspection, let alone how to begin the process of obtaining inspection. Currently no clear, concise guidance document is published by FSIS that points prospective applicants to resources for determining whether or not they need inspection, how to apply for inspection, how inspection works, or how to begin the process of designing a production facility that complies with regulatory requirements. Such a document should also include how to

**National Advisory Committee on Meat and Poultry Inspection**  
**June 21-22, 2023**

access outreach services to assist them in the process of meeting regulatory requirements and obtaining a grant of inspection. This document should also be available in multiple languages sufficient to reach underserved populations.

- A third barrier inhibiting many establishments in underserved communities from applying for FSIS inspection is their own desire to maintain state inspection as opposed to FSIS inspection. Many establishments make the choice to obtain or maintain state inspection despite the business limitations imposed by the FSIS prohibition on “at least equal to” state inspected products entering interstate commerce. Participation in interstate commerce would have an undeniably positive impact on these businesses and their communities with no negative impact on food safety (as evidenced by annual audits of “at least equal to” state meat and poultry inspection programs by FSIS). Given the limitations faced by state inspected establishments, coupled with the persistent choices made by many establishments to obtain and maintain state inspection, it stands to reason that “at least equal to” state meat and poultry inspection programs are in some manner preferable to many establishments in underserved communities. This preference is therefore a barrier to these establishments applying for FSIS inspection.
- An additional barrier to both new and existing establishments that appears to be emerging involves the regulatory burden environmental control agencies may place on meat and poultry production establishments regarding wastewater handling requirements. Though these regulatory efforts are currently in an exploratory phase, the proposed changes would involve large expenses for small businesses to hold, test, and remove wastewater from their facilities far in excess of the current regulatory burden. This could have a disproportionate and potentially disastrous impact on small and very small meat and poultry processors.
- Some establishments may also face difficulties in disposal of inedible materials. Establishments in underserved rural communities may incur a significant expense to dispose of these materials if they are located a significant distance from rendering establishments.
- **Question 3: What steps, outreach methods, partnerships, or strategies should FSIS consider to raise awareness of its available resources in underserved communities?**
  - The first method FSIS should utilize to raise awareness of available resources in underserved communities is to publish a clear, concise guidance document that points prospective applicants to resources for determining whether or not they need inspection, how to apply for inspection, how inspection works, and how to begin the process of designing a production facility that complies with regulatory requirements. In particular, the document should provide guidance on facility construction, product flow, written food safety systems (such as SSOP, HACCP, recall plans, laboratory testing, and prerequisite programs), and potentially guidance for engaging with other regulatory entities that may have jurisdiction impacting meat and poultry businesses. Such a document should also include how to access outreach services to assist prospective applicants in the process of meeting regulatory requirements and obtaining a grant of

**National Advisory Committee on Meat and Poultry Inspection**  
**June 21-22, 2023**

inspection. These outreach services may include, but are not necessarily limited to, trade organizations, state departments of agriculture, extension offices, academic institutions, local health departments, state meat and poultry inspection programs, local community development offices, and FSIS websites, district office points of contact, state and federal compliance personnel, and EIAO personnel. This document should also be available in multiple languages sufficient to reach underserved populations.

- A second method FSIS should utilize to raise awareness of available resources in underserved communities is to expand engagement and accessibility to increase participation in small plant round table and townhall virtual meetings. This may be accomplished by increasing proactive engagement with state meat and poultry inspection programs, local health departments, local and regional meat processing academies and other educational centers, meat, poultry, and other food trade organizations, small business associations, and livestock associations. FSIS should also publicize the sign-up mechanism for meeting announcements.
- A third method FSIS should utilize to raise awareness of available resources in underserved communities is to re-emphasize to FSIS personnel, particularly compliance and EIAO personnel, that a key part of their job duties is to proactively connect establishments and prospective establishments with targeted resources and assistance that may benefit that specific business.
- FSIS should also consider forming a partnership with the Small Business Administration to help connect underserved communities with available resources.
- **Question 4: What datasets or other resources are available to assist FSIS in identifying underserved communities that would benefit from increased slaughter or processing capacity?**
  - FSIS should consider analyzing data from FSIS sources asking the following questions:
    - How many individuals are contacting FSIS and expressing interest in starting meat and poultry businesses in a 12 month period?
    - How many businesses actually apply for inspection in a 12 month period?
    - How many businesses that apply for inspection actually obtain a grant of inspection in a 12 month period?
    - How many businesses that obtain a grant of inspection in a 12 month period are still open 1 year after receiving a grant of inspection and beginning operations?
    - FSIS should conduct follow-up surveys to determine common reasons why interested parties decided not to pursue FSIS inspection or common reasons why business which obtained a grant of inspection either failed to begin operations or ceased operations. Further analysis of this data should be analyzed for impact on underserved communities.
  - FSIS should also consider reaching out to state departments of agriculture, extension offices, local USDA offices, Farm Bureau, and community development organizations

**National Advisory Committee on Meat and Poultry Inspection**  
**June 21-22, 2023**

regarding the number of inquiries they receive about how to obtain a grant of inspection or how to start a meat and/or poultry business.

- FSIS should consider obtaining population and livestock/producer density data to target outreach activities to underserved areas. This may include an analysis of numbers and locations of large and small livestock operators in relation to large and small slaughter and processing establishments (including establishments under both FSIS and state inspection). Particular attention should be paid to the locations of small livestock producers with respect to locations of smaller slaughter facilities. FSIS should also consider reporting this data after a reevaluation of size classification definitions (this suggestion will be explored further under question 6).
- FSIS may wish to partner with the Centers for Disease Control, utilizing FoodNET, to explore a comparison of Foodborne illness location data and source by population demographics.
  
- **Question 5: What concrete actions can FSIS take, alone or in partnership with other stakeholder organizations, to most effectively stimulate increased slaughter or processing capacity in underserved communities?**
  - The single most impactful action FSIS could take is to publish a clear, concise guidance document that points prospective applicants to resources for determining whether or not they need inspection, how to apply for inspection, how inspection works, and how to begin the process of designing a production facility that complies with regulatory requirements. In particular, the document should provide guidance on facility construction, product flow, written food safety systems (such as SSOP, HACCP, recall plans, laboratory testing, and prerequisite programs), and potentially guidance for engaging with other regulatory entities that may have jurisdiction impacting meat and poultry businesses. Such a document should also include how to access outreach services to assist them in the process of meeting regulatory requirements and obtaining a grant of inspection. These outreach services may include, but are not necessarily limited to, trade organizations, state departments of agriculture, extension offices, academic institutions, local health departments, state meat and poultry inspection programs, local community development offices, and FSIS websites, district office points of contact, state and federal compliance personnel, and EIAO personnel. This document should also be available in multiple languages sufficient to reach underserved populations. Stakeholder input should be utilized throughout the development process and social media should be utilized to advertise the availability of the guide.
  - FSIS should utilize EIAO personnel to conduct onsite outreach visits for prospective establishments from less of a “regulatory” perspective and more of a “consultative” perspective. FSIS should consider allocating individuals entirely to this task instead of making it a portion of existing employee responsibilities.
  - State meat and poultry inspection programs have historically been a key provider of inspection services to underserved communities. However, the current prohibition on entry of “at least equal to” state inspected products into interstate commerce forces

**National Advisory Committee on Meat and Poultry Inspection**  
**June 21-22, 2023**

these establishments to choose between state inspection and a potential expansion of their business. Many of these establishments make the choice to accept this FSIS imposed limitation on their growth in order to maintain state inspection, which limits the benefits those establishments provide to their underserved community, including employment opportunities and food security. Current options presented to states and establishments under the Cooperative Interstate Shippers program and the Talmage-Aiken program are insufficient since they require state meat and poultry inspection programs to perform “same as” inspection, thereby negating the potential benefits of an inspection program tailored to small and very small establishments that can be attained under an “at least equal to” state meat and poultry inspection program. FSIS should lift the prohibition on entry into interstate commerce for products from state inspected establishments under the inspection of “at least equal to” state meat and poultry inspection programs. Prohibition on these products entering international commerce should remain.

- **Question 6: Are there any additional thoughts or recommendations you’d like to share?**
  - Current size classifications categorize meat and poultry businesses by their number of employees. There is a tremendous difference between an establishment with up to 499 employees and an establishment with 11 employees, but current classification definitions would classify both of these types of establishments as “small”. FSIS should reevaluate the entirety of their size classification system to better group similar establishments in size classification categories. Stakeholder input should be obtained throughout this process with an emphasis on small and very small establishments.
  - FSIS should evaluate the vast amount of information accessible through FSIS websites to improve ease of navigation and assist producers and prospective applicants with obtaining applicable information for a given topic in a clear, concise fashion. The current presentation of a tremendous amount of information is cumbersome and confusing.
  - FSIS should proactively engage with environmental regulatory agencies to ensure that proposed revisions to standards governing the discharge of wastewater from meat and poultry slaughter and processing establishments are not significantly detrimental to small and very small meat and poultry businesses.
  - FSIS should explore options to assist small and very small meat and poultry establishments in areas underserved by rendering resources. This may include options such as incentive programs or central collection points, but should seek to give underserved communities options on how to meet regulatory requirements for inedible disposal in a practical manner.