

In-Plant Performance System (IPPS) & Supervisory Tool for Assessment Results (STAR)

Objectives

After completing this module, you will be able to:

1. Define IPPS and STAR.
2. Identify the positions covered under IPPS and STAR.
3. Identify the relationship between IPPS, STAR, and OFO's management control system.
4. Identify the number of IPPS and STAR assessments that must be performed per rating cycle.
5. Identify the relationship between IPPS assessments, STAR assessments, progress reviews, and performance appraisals.
6. List the steps for preparing for IPPS and STAR assessments.
7. Identify the methods of assessing performance.
8. Recognize the importance of feedback.

Resources

United State Department of Agriculture Regulation 4040-430 Performance Management

FSIS Directive 4430.3 In-Plant Performance System (IPPS)

FSIS Directive 4430.5 Supervisory Tool for Assessment Result (STAR)

In-Plant Performance System (IPPS)

Introduction

The In-Plant Performance System (IPPS) is a tool that supervisors use to assess the performance of non-supervisory in-plant inspection program personnel. IPPS covers all non-supervisory in-plant inspection program personnel including Food Inspectors, Consumer Safety Inspectors, and Public Health Veterinarians. An IPPS review is conducted by Office of Field Operations (OFO) supervisors including Frontline Supervisors, Multi-IPPS Supervisors, Supervisory Public Health Veterinarians and Supervisory Consumer Safety Officers, who rate the performance of non-supervisory in-plant program personnel. In addition, IPPS provides the opportunity for first-hand, onsite observation of how well an employee conducts FSIS inspection and verification procedures in federally inspected establishments.

FSIS' mission of protecting the health and welfare of consumers is set forth in the FMIA, PPIA, and EPIA. In-plant supervisors are responsible for ensuring that the employees under their supervision know how to adequately perform their jobs and are aware of the impact that off-target performance might have on the health and welfare of consumers.

IPPS was first implemented on October 1, 2002. FSIS Directive 4430.3 explains the IPPS procedure. In 2006, FSIS launched AssuranceNet which is used to capture IPPS assessment findings. Some of these findings feed into organizational performance measures in AssuranceNet for management control purposes.

IPPS and the Management Control System

Performance Management is a mandatory and statutory requirement for federal agencies. Every Federal agency is required to have a performance management system that identifies and sets performance expectations for all of its employees, monitors their performance via progress reviews, and rates this performance by assigning a summary level rating. Summary level ratings are expressed as Outstanding, Superior, Fully Successful, Marginal, or Unacceptable.

OFO uses IPPS as a tool to assist supervisors in assessing the employee's knowledge of their job requirements. It is designed to provide supervisors with a structured process for examining the elements of a job to identify, address, and correct areas where there is a need for performance improvement, it also allows supervisors to provide feedback to the employees. Information is also extracted from the IPPS assessment sheets for use within the OFO's management control system. Despite the fact that IPPS measures individual performance while management control is focused on organizational performance, there is a link between the two. If individuals are not properly executing mission critical functions, an organization is less likely to successfully accomplish its mission as whole.

At least two IPPS assessments should be conducted for each covered employee during the rating cycle (October 1 – September 30). The first IPPS assessment should be conducted approximately 45 – 60 days after setting the performance standards, and again between the midpoint progress review and the final rating. IPPS assessments are used in addition to progress reviews and the annual performance rating. Supervisors may conduct more

than two IPPS assessments during the rating cycle; they should do so if they cannot thoroughly assess all of the IPPS performance elements within two assessments, or if they need to follow-up on issues that were identified within previous IPPS assessments. A performance rating is not assigned or discussed during IPPS assessments.

Non-supervisory IPP performance elements include:

1. Mission Support (Critical);
2. Communications (Critical); and
3. Individual Contributions to the Team.

OFO managers and supervisors review IPPS assessment results and provide appropriate feedback as follows:

- The SPHV reviews 25 percent of IPPS assessments conducted by the SCSi with at least two of these reviews accomplished by direct observation.
- The FLS reviews 10 percent of IPPS assessments conducted by the SPHV and SCSi with 1 percent of these reviews accomplished by direct observation.
- The District Manager (DM) team reviews 10 percent of IPPS assessments conducted by the FLS, SPHV, or SCSi with at least 1 percent of these reviews accomplished by direct observation.
- The Executive Associate for Regulatory Operations (EARO) reviews 2 percent of IPPS assessments that have been reviewed by the DM team.

Preparing for IPPS Assessment

Preparation is an essential aspect of any IPPS assessment. Make sure that you are familiar with the processes and the FSIS verification activities that are conducted at the establishment.

- Print out two IPPS forms, so that you and the employee can both take notes during the assessment.
- Select a number of applicable elements/sub-elements to cover during the assessment and decide how much time you want to spend on the assignment and arrange for staffing, if necessary.
- Determine how employees are maintaining electronic information as required by their positions.
- Review and assess Public Health Information System (PHIS) data and reports, where applicable, to identify potential problem areas to focus on during the IPPS assessment.
- Use Directive 4430.3 Attachment-3 which addresses data Sources for IPPS preparation to prepare for the IPPS visit.

- Review all data sources to determine whether IPP responsible for maintaining the PHIS system at the plant level are keeping the establishment profile current, completing routine inspection tasks, properly entering data concerning scheduled procedures performed or not performed, and entering unscheduled procedures performed.
- Use the standard reports to determine whether trends are developing, which indicate whether the inspectors are on or off target in performing their verification duties.

Examples of data sources you can review before an IPPS visits include:

- Noncompliance records to determine whether the NRs are being written in accordance with FSIS Directive 5000.1.
- Electronic Animal Disposition Report from PHIS to determine whether the inspector or the PHV is keeping the data current and is performing the appropriate humane handling procedures. The supervisor is to review the data to see if humane handling procedures performed are covering all humane handling activities over time, and that proper times are recorded for each activity.
- Food safety assessments and enforcement actions at the establishment where the assessed employee participated in a recent food safety assessment or enforcement action. The IPPS visit can be used to determine the inspection personnel's effectiveness in carrying out the verification plan and reporting on issues identified. Review the verification plan and the inspection personnel's verification reports and provide feedback to the employee.
- Previous IPPS assessments to determine whether there are follow-up issues to cover during the visit, and to ensure that the employee has completed any remedial assigned activities prescribed at the time of the prior IPPS assessment.
- New Agency directives and notices that are relevant to the employee's assignment and position.
- Training reports to ensure that employees have successfully completed required training.

Conducting an IPPS Assessment

There are 3 methods of assessing the performance of inspection program personnel: observation, records review, and discussion. You may use one method or a combination of these. You can observe the inspection program personnel and ask questions as they conduct verification procedures, perform the procedures after the inspector to see if you get the same results, or ask questions and discuss inspection procedures. Review the documentation, reports, and correspondence in the government files. Also, be sure to discuss inspection methods, the decision-making process, documentation, and enforcement protocol with the inspection program personnel. Observe the conditions in the establishment and compare them to the noncompliance reports that were written by the

employee being assessed. How you choose to gather information during the assessment is up to you. However, you should be consistent in applying standards during your visits in order to come away with a true assessment of what the employees know and how they apply that knowledge.

When conducting an IPPS assessment, verify that the employee is:

- Applying the appropriate inspection methodology, such as observing establishment employees conducting procedures, reviewing establishment records, and performing tasks;
- Utilizing effective decision-making to determine whether there is noncompliance;
- Documenting their findings appropriately, if required;
- Implementing enforcement actions properly (e.g., verification plans for suspensions and Notices of Intended Enforcement (NOIEs)), when authorized to do so; and
- Implementing regulatory control actions.

NOTE: You don't have to conduct IPPS visits at all establishments on an employee's assignment. However, you should ensure that the employee can demonstrate an understanding of the methodology relevant to the whole assignment and an ability to execute it.

Feedback: After completing an assessment, give the employee verbal feedback based on what you observed during the assessment. This should be a constructive feedback session.

Documenting an IPPS Assessment

- Complete the IPPS Assessment Form, and state whether the employee understanding of and ability to execute regulatory requirements was satisfactory (using Yes or No).
- Document positive performance briefly in the narrative boxes.
- Document any deficiency in the employee's performance in a particular element or sub element indicating that the overall employee knowledge of the job requirement is deficient.
- Include recommended actions that the employee is to take to improve her/his knowledge and execution of inspection methods (e.g., review relevant directives, review Inspection Methods training module). Monitor the follow-up items to ensure that they are accomplished.
- Provide a copy of the assessment to the employee within 2 weeks of the assessment, by either printing a hard copy for the employee or e-mailing a PDF copy.

- Keep the completed IPPS assessment forms for one year following the termination of the previous rating cycle.
- Retain electronic copies of these in an electronic folder in your work files.
- At the appropriate time, discard or delete any electronic versions of the assessment sheets from your computer.

IPPS Assessment Forms are not filed in the HRFO's Official Personnel Folder or the Employee's Performance File. You will find that your IPPS assessment files provide useful information at the end of the appraisal year. They will refresh your memory, help you to make rating decisions, and serve as a history of consistently executed assessments of employee performance. Use good judgment when combining data from the IPPS Assessment Sheets with any other information regarding employee's performance

Any issues of misconduct that are identified during an IPPS visit should be addressed with your District Office. Once the IPPS Assessment form has been completed, an electronic, read-only version or a hardcopy needs to be given to the employee within two work weeks of the assessment.

Note: If an employee's performance is unacceptable in one or more critical elements at any time during the performance appraisal cycle, follow the directions outlined in Departmental Regulation 4040-430 Performance Management.

Supervisory Tool for Assessment Results (STAR)

Introduction

The Supervisory Tool for Assessment Results (STAR) is a tool that supervisors can use to assess the knowledge and proficiency of field level supervisory personnel. It requires supervisory personnel to determine whether in-plant, subordinate supervisors carry out both program activities and supervisory responsibilities, in accordance with applicable regulatory requirements and FSIS directives and notices. STAR does not replace the Performance Management System. The positions covered by STAR include the following:

- Supervisory Public Health Veterinarians (SPHVs),
- Supervisory Consumer Safety Inspectors (SCSI), and
- Supervisory personnel stationed at HACCP- based Inspection Models Project (HIMP) establishments.

OFO executives, managers, and field-level supervisory personnel must conduct an oversight review of the STAR assessments and provide feedback on them. The minimum expectations for the review are as follows:

- The front line supervisors (FLSs) review 50 percent of the STAR assessments conducted by the SPHV.
- The district management team reviews at least one assessment per circuit performed by the FLS.
- The executive associates for regulatory operations (EAROs) review 5 percent of the district management team reviews.

Preparing for STAR Assessment

Review FSIS Directive 4430.5 Supervisory Tool for Assessment Result (STAR); FSIS Form 4430-11A; and Supervisory Tool for Assessment Results (STAR) Guideline for the SPHV, SPHV (HIMP), SCSI. Print FSIS Form 4430-11 to use as a worksheet during your assessment. Use the same preparation methodology you use for IPPS assessment.

Conducting STAR Assessment

OFO field-level supervisory personnel must conduct at least one, in-person assessment for each covered employee during the rating cycle. Supervisors have flexibility in deciding when to conduct the assessment and whether to assess all the elements and sub-elements during a single visit or through multiple visits over the course of the rating cycle. Some elements, such as communication can be assessed separately from the on-site visit.

Supervisors can use the record review method, the discussion method, and the observation method, either singularly or in combination, while conducting the STAR assessment.

Conduct any appropriate follow-up (for example, if an employee lacks essential knowledge of certain elements or sub-elements) and discuss the actions necessary for performance

improvements, such as training. Perform a follow-up review within 60 days of identifying the deficiency.

If an employee's performance is unacceptable in one or more critical elements at any time during the performance appraisal cycle, follow the directions outlined in Departmental Regulation 4040-430 Performance Management. Any misconduct issues identified during the STAR visit should be addressed with the district office.

Documenting STAR Assessment

Give verbal feedback to the employee upon completing the assessment. Document your assessment in AssuranceNet. Provide the employee with a read- only electronic copy, or a hardcopy of the document within two work weeks of the assessment.

Workshop 1

1. IPPS is a tool that _____ use to assess the performance of _____ in-plant inspection program personnel.

2. A minimum of how many IPPS assessments must be performed per rating cycle?

3. A minimum of how many STAR assessments must be performed per rating cycle?

4. What are the three methods of assessing performance?

5. IPPS and STAR assessments will replace progress reviews and performance appraisals

- a. True
- b. False

6. Which of these positions is not covered under IPPS?

- a. Food Inspectors
- b. Public Health Veterinarians
- c. Consumer Safety Inspectors
- d. Supervisory Public Health Veterinarians

7. Following an IPPS and STAR assessment, a completed IPPS or STAR assessment sheet should be mailed to the employee within two months.

- a. True
- b. False

Workshop 2

Use the information below to complete the IPPS Assessment Sheet for Inspector Lynda Smith

Date: December 1, 2014
 District Name: Atlanta
 District Code: 0011
 Circuit Name: Anywhere
 Circuit Code: 01
 Name of Supervisor: Dr. Thomas Williams

You are a new SPHV performing your first IPPS assessment of Food Inspector Lynda Smith. You have already set the performance standards by discussing the pre-selected performance elements in early July. You review the IPPS Assessment Sheet for Food Inspectors and select the performance elements and sub-elements that will be covered during the assessment. You select the sub-elements under Mission Support and Communications, and you decide to spend four hours at Lynda's assignment.

After reviewing the IPPS tools, you identify questions to discuss and activities to conduct from the Food Inspector Supervisory Guide. You develop a draft plan and an outline for the visit which will include observation and discussion. You arrange staffing for the IPPS Assessment.

You observe Lynda performing postmortem inspection procedures at her inspection station. She uses appropriate inspection procedures for the Streamlined Inspection System (SIS). She instructs the inspector helper (trimmer) to remove carcasses with improper presentation from the line and to retain them, but fails to notify the off-line inspection program personnel when improper presentation occurs with unacceptable regularity. She retains a carcass and viscera with a large mass in the abdominal cavity on the designated shackle for veterinary disposition. When you ask her why she retained the carcass, she states that she retained it because the carcass also appeared to be emaciated.

You ask Lynda the three disposition options during postmortem inspection. She responds appropriately. You evaluate Lynda's decision-making process by asking her questions regarding pathology and postmortem dispositions. While you are observing Lynda, you also notice that she is not identifying and condemning any cadavers. She is allowing her helper to identify cadavers and to make the dispositions. You ask her why she is allowing her helper to identify and condemn cadavers. She explains that, since she has difficulty identifying cadavers, she allows her helper to make that call. You discuss the disposition criteria for cadavers with her. Also, you discuss the differences between Lynda's role and the inspector helper's role during postmortem inspection.

Next, you decide to perform a correlation with her on the carcasses in her condemn can. As you examine the condemned carcasses and parts, you ask questions that help you to evaluate her thoughts and decision making process. Out of the twenty carcasses in her can, there are six without cause for condemnation. When you question her about why

these were condemned, Lynda states that she condemned these carcasses for septicemia/toxemia because they appeared to be very thin. You review the condemnation criteria for septicemia/toxemia with her.

It is now time for Lynda to take a company break. Since off-line inspection personnel are not in the evisceration department, Lynda ensures that the denaturant is placed on the carcasses in her condemn can before leaving her station.

Following company break, Lynda returns to her inspection station. As part of her on-line postmortem inspection duties, she verifies the removal of the contaminated carcasses and those parts with visible fecal contamination. Although she handles the contaminated carcasses and parts correctly, she fails to notify the off-line inspection personnel when contamination occurs with unacceptable regularity.

You and Lynda go to the USDA office to discuss the assessment. You tell her that you are pleased with her knowledge of the inspection procedures of the SIS inspection system. Although you are pleased overall with her postmortem dispositions as well, you add that you are concerned about her ability to identify cadavers and carcasses with septicemia/toxemia. You tell her that she should retain carcasses for you when she is uncertain about the disposition, and that she should never allow her helper to make dispositions for her. You also discuss the relationship between her role and the helper's.

You point out the importance of notifying off-line inspection personnel when trends are detected such as multiple carcasses and parts with fecal contamination or presentation issues. You ask her to give you some examples of situations in which she needs to communicate information immediately to the off-line inspectors or to her supervisor. She answers correctly. To assess Lynda's knowledge of poultry good commercial practice, you ask her to give you some examples of bird mistreatment and the actions that should be taken in response to each, she again answers correctly.

You commit to performing weekly pathology correlations with her for the next month. During your discussion, you discover that she has not attended the Poultry Slaughter Inspection Training course. You contact the district office and make arrangements to enroll her in the next session of it. You tell Lynda that she will receive her completed IPPS assessment within two work weeks.