

VERMONT AGENCY OF AGRICULTURE, FOOD & MARKETS
CONSUMER PROTECTION AND FOOD SAFETY
Meat Inspection Service
MONTPELIER, VT
Chuck Ross, Secretary



MIS DIRECTIVE

Adopted from FSIS Directive 4430.3 Rev 4

4430.3 Rev 4 3/1/16

IN-PLANT PERFORMANCE SYSTEM (IPPS)

I. PURPOSE

This directive provides revised procedures for supervisors who conduct, document, and report on IPPS assessments. FSIS has revised this directive in its entirety.

KEY POINTS

- *Introduces a revised IPPS Assessment Form*
- *Introduces new guidance on conducting an IPPS*
- *Merges content from the IPPS Supervisory Guide*

II. CANCELLATION

FSIS Directive 4430.3, Revision 3, In-Plant Performance System (IPPS), 9/11/12

III. BACKGROUND

A. IPPS provides a firsthand, onsite observation of how well employees conduct inspection and verification procedures in state-inspected establishments. In addition, IPPS assesses employees' demonstrated knowledge of job requirements, appropriate regulatory decision-making, and ability to execute inspection and verification procedures.

B. This directive is to be followed by supervisors who rate the performance of non-supervisory in-plant inspection program personnel (IPP). In-plant inspection positions that are subject to IPPS assessments are identified in Attachment 1.

DISTRIBUTION: Electronic

C. IPPS is a tool that supervisors use to assess the work of non-supervisory in-plant inspection program personnel (IPP). IPPS includes the following benefits:

1. Encourages effective communication between supervisors and their subordinates;
2. Identifies and addresses the need to improve employees' knowledge of their job requirements;
3. Encourages correlation with employees to ensure consistency in inspection methods and applications;
4. Recognizes on-target or noteworthy employee performance;
5. Assists in measuring organizational performance through performance standards; and
6. Links IPPS assessment results and work unit meeting topics to address common or group needs that are discovered during IPPS visits (**example**: matters on which supervisors find misunderstandings or lack of program execution among multiple inspection personnel).

IV. GENERAL SUPERVISORY RESPONSIBILITIES

A. Supervisors are to conduct at least two IPPS assessments for employees covered by IPPS during the performance rating cycle. An IPPS performed by a federal PHV in a federal assignment may count as IPPS assessments.

EXCEPTION: If an employee is supervised for part of the year, it may not be feasible for a supervisor to conduct two assessments before the end of the year.

B. Supervisors can conduct more than two IPPS assessments during the year and are to do so if they cannot thoroughly assess all of the elements and sub-elements over two assessments, or if they have a need to follow up on issues identified in previous IPPS assessments.

C. Supervisors are to ensure that IPP are reporting inspection results in accordance with Agency regulatory requirements, policies, and procedures.

V. OVERSIGHT AND MANAGEMENT CONTROLS

A. The Agency has established a management control system that provides management oversight of the public health and management activities carried out by IPP. The management control system also provides the Agency with the capability to demonstrate and verify its effectiveness in protecting the public health by achieving and maintaining specific levels of performance in its daily food safety, food defense, and management and supervisory operations.

B. To carry out this oversight, the chief reviews IPPS assessment results and provide appropriate feedback.

VI. IPPS AND THE PERFORMANCE MANAGEMENT SYSTEM

A. IPPS does not replace the Agency's performance management system. VAAFM uses IPPS, which applies to non-supervisory in-plant occupations, to assess employees' knowledge of their job requirements. IPPS:

1. Is designed to provide supervisors with a structured process to look at specific elements of the job;
2. Is used to provide feedback to employees to identify, address, and correct areas where there is a need for improvement in performance; and
3. Does not provide or assign a performance rating. Therefore, IPPS data can be used, along with other data and information about an employee's performance, to determine the performance rating.

B. The mission of Vermont State Government is to provide essential services to Vermont citizens. Meeting this commitment requires that each state employee performs his or her job as capably as possible. To this end, among the most fundamental of a supervisor's responsibilities is the planning, observation, evaluation, and development of employee job performance.

Performance management is an effective supervisory tool that can enhance the productivity and motivation of employees. Clear job responsibilities and expectations are established in relation to organizational goals and objectives. Continuous feedback is provided to improve communication between employees and supervisors. Formal performance reviews document and evaluate performance in relation to established expectations.

The state of Vermont has a performance management system under which supervisors identify and set performance expectations and monitor performance by way of an annual performance review and rates performance annually by assigning a rating of: Outstanding, Excellent, Satisfactory, Unsatisfactory.

C. Supervisors are to use their judgment when combining data from IPPS assessments that are completed during the rating period and other information regarding an employee's performance. The performance rating is to reflect the employee's performance for the entire rating cycle.

D. The IPPS Assessment Form does not replace any existing performance appraisal processes or Vermont State forms.

VII. TIMEFRAMES FOR CONDUCTING REQUIRED IPPS ASSESSMENTS

A. Supervisors, at their discretion, may conduct more than two IPPS assessments during the rating year. Supervisors are encouraged to do so if they cannot thoroughly assess all the performance elements over two assessments, or if they need to follow up on issues identified in previous IPPS assessments.

VIII. IPPS ASSESSMENT PROCESS

A. The supervisor plays a key role in ensuring that:

1. Decisions made by IPP are uniform, consistent, and in accordance with applicable statutes, regulations, issuances, and other Agency policies; and
2. Duties performed by IPP are in accordance with prescribed inspection methods and procedures.

B. Supervisors also are to ensure that IPP are applying the appropriate inspection methods, using effective regulatory decision-making, documenting findings appropriately, and implementing regulatory enforcement actions properly.

IX. ASSESSMENT CRITERIA

A. Supervisory personnel are to use the following steps to assess non-supervisory IPP knowledge of their job requirements.

B. Assess the Performance Elements. The performance elements and activities are tailored to non-supervisory in-plant inspection program occupations. The performance elements include:

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

C. Plan and Prepare for IPPS Assessment. Preparation is an important aspect of any IPPS assessment. Before conducting the IPPS assessment, the supervisor is to:

1. Select a sufficient number of elements (and their sub-elements) on the IPPS Form to cover during the IPPS assessment to ensure that all applicable elements are covered for the positions before the end of the annual rating period.

NOTE: Make sure the mandatory critical mission support and other critical elements are covered first.

2. Determine how employees are maintaining electronic information as required by their positions.

3. 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. Attachment 3 outlines PHIS reports and other data sources supervisors can use to prepare for an IPPS visit. Supervisors are to also review these 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. This data review will give the supervisor insight into the decisions that the inspector makes regarding which procedures to perform and at what frequency. The supervisor can 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 supervisors are to review before an IPPS visits include:

a. Review noncompliance records to determine whether the NRs are being written in accordance with FSIS Directive 5000.1, *Verifying an Establishment's Food Safety System*.

b. Use the 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.

c. Review 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. The supervisor is to also review the verification plan and the inspection personnel's verification reports and provide feedback to the employee.

4. Review feedback from previous IPPS assessments to determine whether there are follow-up issues to cover during the visit. When a follow-up is required, supervisors are to make sure that the employee has completed the remedial assigned activities prescribed at the time of the prior IPPS assessment. Supervisors are to also reassess the elements and sub-elements on which follow-up was indicated.

5. Identify new Agency directives and notices that are relevant to the employee's assignment and position. In addition, supervisors are to use the IPPS assessment as an opportunity to ensure that the employee

has followed the instructions in the new directive or notice, as required, including ensuring that any required Memoranda of Interview are in place for required awareness meetings with establishment management, and that there is adherence to any verification procedures or other instructions provided in the issuance.

6. Ensure that employees have successfully completed required training (**examples:** on-the-job training or formal training courses).

D. When completing the IPPS Assessment Form, a supervisor is to document very briefly how she/he prepared for the IPPS visit, including information on the data sources that he/she used.

X. METHODS FOR CONDUCTING AN IPPS ASSESSMENT

A. In general, supervisors are to use the following methods singularly or in combination when conducting IPPS assessments:

1. Observe the employee performing verification tasks;
2. Review documentation, reports, and correspondence in the government files;
3. Observe plant conditions and compare them to inspection results and noncompliance records on file; and
4. Ask questions about inspection methods, regulatory decision making, documentation, and enforcement procedures (e.g., types of regulatory control actions that can be taken and when; due process) to the Agency employee as he/she performs inspection verification activities. Provide hypothetical situations or scenarios to get the employee to describe what she/he would do in response to the situation.

B. Supervisors are to properly plan, prepare, and execute the plan to document an effective IPPS assessment.

NOTE: A supervisor does not have to conduct IPPS visits at all establishments on an employee's assignment. However, the supervisor is to ensure that the employee can demonstrate an understanding of the methodology relevant to the whole assignment and an ability to execute it.

C. When conducting an IPPS assessment, a supervisor is to verify that the employee is:

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

D. The supervisor is to meet with the employee at the end of the assessment and provide verbal feedback on performance.

E. The supervisor is to complete the IPPS Assessment Form. The supervisor is to state whether the employee's understanding and ability to execute regulatory requirements was satisfactory using Yes or No. A supervisor can document positive performance briefly in the narrative boxes. If the supervisor finds that performance of a sub-element is unsatisfactory, he/she is to clearly describe the deficiencies observed and discussed in documentation that is within the character limit allotted for the narrative boxes (2000 characters).

F. The supervisor is to 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 emailing a PDF copy.

G. When applicable, a supervisor's findings are to also 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) and a timeframe for completing the action.

H. The supervisor is to follow the directions outlined in [Guide to the State Performance Management System](#), when an employee's performance is unacceptable in one or more critical elements at any time during the performance appraisal cycle.

I. The supervisor is to contact the Chief of Inspection for further guidance if misconduct issues are identified during the IPPS visit.

J. The supervisor is to monitor follow-up items to ensure that they are accomplished.

K. The supervisor is to follow up on any sub-elements for which performance was found to be unsatisfactory during the next IPPS assessment.

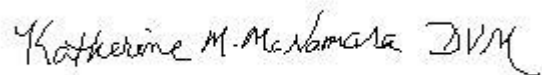
XI. IPPS ASSESSMENT FORM AND MAINTENANCE

A. A supervisor can download the fillable PDF IPPS Assessment Form or the Word format IPPS Assessment Form (see example in Attachment 2) via InsideFSIS at: OFO Resources (Level 2 eAuthentication is needed to access this page).

NOTE: IPPS Assessment Forms are not filed in the Human Resource Operation's official personnel folder or the employee's performance file.

XII. QUESTIONS

Refer questions through supervisory channels.



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POSITIONS COVERED BY IPPS – ATTACHMENT 1

Food Safety Specialist I and II

IPPS ASSESSMENT FORM

Name of Employee		Name of Supervisor	
Position Title	Assessment Number	Assessment Date	
District		Circuit	
How did you prepare for this IPPS?			
MISSION SUPPORT			
SPS/SSOP		Satisfactory? (Yes/No/NA)	Comments:
Assess understanding of methodology: 1. IPP is verifying compliance with SPS and SSOP regulatory requirements in accordance with 9 CFR 416.1 – 416.17, Directive 5000.1., 5300.1, FSIS Directive 5030.1 and FSIS Directive 5030.2.			
Assess IPP is executing the inspection methodology: 1. IPP is familiar with the establishment's written SSOPs. <ul style="list-style-type: none"> a. IPP verifies establishment is implementing and maintaining SSOPs. b. Based on findings, IPP is able to determine if establishment is implementing procedures in preventing insanitary conditions. IPP is documenting findings in PHIS. c. If noncompliance is found, IPP takes appropriate regulatory control action and documents noncompliance in PHIS. 2. IPP is familiar with the establishment's pest control procedures. <ul style="list-style-type: none"> a. IPP verifies establishment is implementing procedures to control pest and rodents in meeting the requirements of 9 CFR 416.2(a). b. Based on findings, IPP is able to 			

<p>determine if the establishment is preventing pest and rodents.</p> <p>c. If noncompliance is found, IPP takes appropriate regulatory control action and documents noncompliance in PHIS.</p> <p>3. IPP is familiar with other SPS regulations regarding, facilities, equipment, utensils sanitary operations, and employee hygiene.</p> <p>a. IPP is able to determine insanitary conditions under the SPS regulations.</p> <p>b. Based on findings, IPP is able to determine if establishment is preventing insanitary conditions.</p> <p>c. If noncompliance is found, IPP takes appropriate regulatory control action and documents noncompliance in PHIS.</p> <p>4. IPP maintains establishment profile to ensure proper SPS/SSOP tasks assigned.</p>		
HACCP	Satisfactory? (Yes/No/NA)	Comments:
<p>Assess understanding of methodology:</p> <p>1. IPP is verifying compliance with HACCP regulations in accordance with Directive 5000.1., 5300.1 and 9 CFR 417.1 – 417.8.</p>		
<p>Assess IPP is executing the inspection methodology (FSIS Directive 5000.1):</p> <p>1. IPP is familiar with establishment’s hazard analysis and any prerequisite programs.</p> <p>a. IPP verifies establishment is implementing all elements of HACCP system.</p> <p>i. Hazard analysis</p> <p>ii. Critical control points</p> <p>iii. Monitoring of critical control points</p> <p>iv. Recordkeeping</p> <p>v. Corrective actions</p> <p>vi. Verification</p> <p>vii. Validation</p> <p>b. Based on findings, IPP is able to determine compliance and consider broader implications of findings to the establishment’s food safety system.</p>		

<p>inspection methodology (Directives 6100.1 & 6100.3):</p> <ol style="list-style-type: none"> 1. Performs ante-mortem inspection appropriate for species. <ol style="list-style-type: none"> a. Based on findings, IPP makes appropriate regulatory determinations. If applicable, IPP is documenting ante-mortem findings in PHIS. b. IPP takes appropriate regulatory control of suspects and condemns. c. If noncompliance is found, IPP documents in PHIS. 		
<p>Assess IPP is executing Post-mortem inspection methodology (FSIS Directive 6100.2, FSIS Directive 6100.3, & FSIS Directive 5300.1):</p> <ol style="list-style-type: none"> 1. Performs post-mortem inspection appropriate for species. <ol style="list-style-type: none"> a. Based on findings, IPP makes appropriate regulatory determinations. If applicable, IPP is documenting post-mortem findings in PHIS. b. IPP takes appropriate regulatory control action of carcasses needing vet dispositions. c. IPP takes appropriate regulatory control action of condemned carcasses. d. If noncompliance is found, IPP documents in PHIS. 2. IPP maintains establishment profile to ensure proper documentation within PHIS/ADR. 		
<p>Humane Handling</p>	<p>Satisfactory? (Yes/No/NA)</p>	<p>Comments:</p>
<p>Assess understanding of methodology:</p> <ol style="list-style-type: none"> 1. IPP is knowledgeable of applicable statutes, regulations, directives and notices. 		
<p>Assess IPP is executing inspection methodology (FSIS Directive 6900.2):</p> <ol style="list-style-type: none"> 1. IPP ensures establishment slaughter activities conform to humane handling regulations and procedures and/or GCPs. <ol style="list-style-type: none"> a. IPP takes appropriate regulatory control action when applicable. 		

b. IPP documents noncompliances and humane handling activities in PHIS.		
Egg Products	Satisfactory? (Yes/No/NA)	Comments:
Assess understanding of methodology: 1. IPP is knowledgeable of applicable statutes, regulations, directives and notices.		
Assess IPP is executing inspection methodology (FSIS Directive 5030.1, FSIS Directive 5040.1): 1. IPP conducts egg product inspection to assure products are in full compliance with regulations (other than SPS). 2. Monitors the shipping and receiving of tanker egg products.		
Economic Adulteration and Labeling Verification	Satisfactory? (Yes/No/NA)	Comments:
Assess understanding of methodology: 1. IPP is knowledgeable of applicable statutes, regulations, directives and notices.		
Assess IPP is executing inspection methodology (FSIS Directives 7000.1, 7230.1, 7221.1, 9900.5): 1. IPP ensures establishment or inspected lot (for imports) is meeting regulatory labeling requirements and product standards. a. Based on findings, IPP is able to determine if establishment or inspected lot is in compliance. 2. In situations of noncompliance, IPP takes appropriate regulatory control action and documents in PHIS.		
Export	Satisfactory? (Yes/No/NA)	Comments:
Assess understanding of methodology: 1. IPP is knowledgeable of applicable statutes, regulations, directives and notices.		
Assess IPP is executing Export Certification methodology (FSIS Directive 9100.1): 1. IPP performs product re-inspection. IPP checks for recordkeeping and documentation for eligible country requirements, completion of certificates,		

labels and any other applicable forms.		
Import Inspection	Satisfactory? (Yes/No/NA)	Comments:
Assess understanding of methodology: 1. IPP is knowledgeable of applicable statutes, regulations, directives and notices.		
Assess IPP is executing Import Inspection methodology (FSIS Directive 9900.1): 1. IPP performs product re-inspection. a. IPP monitors incoming shipment to ensure presentation of the lot. b. IPP appropriately controls Failure to Present (FTP) lots. c. IPP verifies required forms on presented lots. d. IPP makes appropriate determinations whether the lot is passed or rejected. e. Appropriately marks inspected lots “inspected and passed” or “refused entry.” f. Appropriately controls lots marked “refused entry.” g. IPP appropriately performs TOI and documents verification results in PHIS.		
COMMUNICATION		
	Satisfactory? (Yes/No)	Comments:
1. IPP affords industry due process in accordance with 9 CFR 500. 2. IPP keeps supervisor informed in a timely manner and in accordance with protocols. 3. IPP meets Agency standards for professionalism. 4. IPP works cooperatively with other agency teams and organizations. 5. IPP makes regulatory decisions in a non-discriminatory and impartial manner. 6. IPP reinspecting imported lots communicate with plant management as required. 7. IPP holds weekly meetings with establishment management to discuss pertinent topics in accordance with Directive 5010.1.		

<p>c. If noncompliance is found, IPP takes appropriate regulatory control action and documents noncompliance in PHIS.</p> <p>2. IPP is maintaining establishment profile to ensure proper HACCP tasks are assigned.</p>		
Food Defense	Satisfactory? (Yes/No/NA)	Comments:
<p>Assess understanding of methodology:</p> <p>1. IPP is knowledgeable of applicable directives and notices.</p>		
<p>Assess IPP is executing the inspection methodology (FSIS Directive 5420.1):</p> <p>1. IPP is verifying the establishment has a functional food defense plan in accordance with Directive 5420.1.</p> <p>2. IPP is documenting findings in PHIS.</p>		
Sampling	Satisfactory? (Yes/No/NA)	Comments:
<p>Assess understanding of sampling methodology:</p> <p>1. IPP is knowledgeable of applicable sampling projects in establishment.</p> <p>2. IPP understands sampling methodology for applicable projects as outlined in FSIS Directives and Notices.</p>		
<p>Assess IPP is executing sampling methodology:</p> <p>1. IPP is performing sampling collection methods in accordance with directives applicable to assignment.</p> <p>2. IPP appropriately reacts to positive sampling results.</p> <p>3. IPP is documenting all sampling in PHIS, including scheduling.</p> <p>4. Prepares and maintains reports (egg products).</p> <p>5. IPP is maintaining establishment profile to ensure proper sampling projects are assigned.</p>		
AM/PM Duties	Satisfactory? (Yes/No/NA)	Comments:
<p>Assess understanding of methodology:</p> <p>1. IPP understands applicable statutes, regulations, directives and notices.</p>		
Assess IPP is executing Ante-mortem		

DATA SOURCES FOR IPPS PREPARATION – ATTACHMENT 3

Below is a chart outlining the reports and other data sources, organized by sub-elements, you can use to prepare for an IPPS visit.

Sub-Element	PHIS Reports	Data in PHIS
<i>SPS/SSOP</i>	Noncompliance Records for an Establishment Task Summary and List for an Establishment Tasks Regulation Verified and Noncompliant Summary for an Establishment PHR Noncompliances for an Establishment	Establishment Profile Inspection Verification Results
<i>HACCP</i>	HACCP Sets for an Establishment Noncompliance Records for an Establishment Task Summary and List for an Establishment Tasks Regulation Verified and Noncompliant Summary for an Establishment PHR Noncompliances for an Establishment	Establishment Profile Inspection Verification Results
<i>Food Defense</i>	Task Summary and List of an Establishment	Inspection Verification Results
<i>Sampling</i>	In-Plant Residue Sampling Results for an Establishment Task Summary and List for an Establishment Sample Collection Status for an Establishment Sampling Form Results for an Establishment Sampling Results for an Establishment Sampling Schedule History for an Establishment Sampling Schedule History with Results for an Establishment Positive Sampling Results: HACCP	Establishment Profile Inspection Verification Results
<i>AM/PM Duties</i>	Pending Dispositions for an Establishment Noncompliance Records for an Establishment Missing Poultry Weights for an Establishment	Establishment Profile Animal Disposition Reporting Disposition Records

	Slaughter Daily Totals Worksheet for an Establishment Slaughter Zero Head Count for an Establishment	
<i>Humane Handling</i>	HATS Detail and Summary for an Establishment Noncompliance Records for an Establishment Task Summary and List for an Establishment	Inspection Verification Results
<i>AM/PM Duties</i>	Pending Dispositions for an Establishment Noncompliance Records for an Establishment Missing Poultry Weights for an Establishment Slaughter Daily Totals Worksheet for an Establishment Slaughter Zero Head Count for an Establishment	Establishment Profile Animal Disposition Reporting Disposition Records
<i>Humane Handling</i>	HATS Detail and Summary for an Establishment Noncompliance Records for an Establishment Task Summary and List for an Establishment MOIs for Good Commercial Practice and Humane Handling for a District Good Commercial Practice Validation for an Establishment HATS Validation Report for an Establishment	Inspection Verification Results
<i>Economic Adulteration and Labeling Verification</i>	Noncompliance Records for an Establishment Task Summary and List for an Establishment Tasks Regulation Verified and Noncompliant Summary for an Establishment PHR Noncompliances for an Establishment	Inspection Verification Results