

VERMONT AGENCY OF AGRICULTURE, FOOD & MARKETS
FOOD SAFETY CONSUMER PROTECTION DIVISION
Meat Inspection Service
MONTPELIER, VT
Anson Tebbetts, Secretary



MIS DIRECTIVE

Adopted from FSIS Directive 4440.1

4440.1

9/1/18

ENFORCEMENT INVESTIGATION AND ANALYSIS OFFICER ASSESSMENTS

I. PURPOSE

This directive provides procedures for supervisors who conduct, document, and report on Enforcement Investigation and Analysis Officer (EIAO) assessments.

KEY POINTS

- *Introduces the EIAO Assessment Form*

II. BACKGROUND

A. The EIAO assessment assesses employees' demonstrated knowledge of job requirements, and appropriate regulatory decision-making.

B. The Chief of Inspection Directly supervises the EIAO.

C. Benefits of the EIAO assessments include:

1. Encouraging effective communication between supervisors and subordinates through the assessment and feedback process;
2. Identifying and addressing the need to improve employees' knowledge of their job requirements;
3. Encouraging correlation with employees to ensure consistency in inspection methods and applications;
4. Recognizing on-target or noteworthy employee performance;

DISTRIBUTION: Electronic; All Field Employees

OPI: OPPD

5. Assisting in measuring organizational performance through OFO's performance standards;

and

6. Linking EIAO assessment results and correlation meeting topics to address common or group needs that are discovered during assessments.

III. GENERAL SUPERVISORY RESPONSIBILITIES

Supervisors are to conduct an annual Performance Evaluation using the state of Vermont Performance Management System. The assessment can be used to inform the Performance Evaluation.

IV. EIAO ASSESSMENT OVERSIGHT

- A. The Meat Inspection Head of Service and the Appointing Authority review 100% of Performance Evaluations, and have an opportunity to offer comments and input into the evaluation.

V. EIAO ASSESSMENTS AND THE PERFORMANCE MANAGEMENT SYSTEM

A. EIAO assessments do not replace the State's performance management system. The Chief uses the EIAO assessment to assess employees' knowledge of their job requirements. The EIAO assessment:

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. EIAO assessment data can be used, along with other data and information about an employee's performance, to determine performance rating.

B. Supervisors are to use their judgement when combining data from 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 EIAO Assessment Form does not replace any existing performance appraisal processes.

VI. EIAO ASSESSMENT PROCESS

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

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

C. Supervisors also are to ensure that EIAOs are applying the appropriate EIAO methodology, using effective regulatory decision-making, documenting findings appropriately, recommending enforcement actions and verifying corrective actions.

VII. ASSESSMENT CRITERIA

A. **Plan and Prepare for an EIAO Assessment.** Preparation is an important aspect of any assessment.

Before conducting the assessment, the supervisor is to review for the individual EIAO during the current performance rating cycle:

1. Past Food Safety Assessments (FSAs) and Public Health Risk Evaluations (PHREs) conducted by the employee;
2. Review Recall Effectiveness Checks;
3. Consumer Complaints in the Consumer Compliant Monitoring System (CCMS);
4. Any relevant administrative actions in the Administrative Enforcement Reporting (AER) module to evaluate whether the employee is collecting evidence appropriately; and
5. Memorandum of Interviews (MOIs) in the Public Health Information System (PHIS) to see if outreach activities are being adequately documented.

VIII. METHODS FOR CONDUCTING AN EIAO ASSESSMENT

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

1. Observe the employee performing and documenting a PHRE or FSA;
2. Review documentation, reports, and correspondence; and
3. Ask questions about EIAO methodology, regulatory decision-making, documentation, and recommendations for enforcement actions. Provide hypothetical situations or scenarios to get the employee to describe what she or he would do in response to the situation.

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

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

1. Applying the appropriate EIAO methodology;
2. Utilizing effective decision-making to determine whether a HACCP system meets regulatory requirements;
3. Documenting his or her findings appropriately, if required;
4. Recommending enforcement actions and verifying corrective actions properly; 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.

IX. QUESTIONS

Refer questions on conducting EIAO assessments to the Office.