

MSA DIRECTIVE

4430.3
Rev. 4

1/6/16

IN-PLANT PERFORMANCE SYSTEM (IPPS)

I. PURPOSE

This directive provides revised procedures for Circuit Managers (CM) who conduct, document, and report on IPPS assessments. MSA 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

MSA Directive 4430.3, Revision 3, In-Plant Performance System (IPPS)

III. BACKGROUND

A. IPPS provides a firsthand, onsite observation of how well employees conduct MSA 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 MSA CM 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.

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

1. Encourages effective communication between CM 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 MSA's 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 CM find misunderstandings or lack of program execution among multiple inspection personnel).

IV. GENERAL CMY RESPONSIBILITIES

A. CM are to conduct at least two IPPS assessments for employees covered by IPPS during the performance rating cycle.

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

B. CM can conduct more than two IPPS assessments during the rating 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. CM are to ensure that IPP are reporting inspection results in accordance with MSA regulatory requirements, policies, and procedures.

V. OVERSIGHT AND MANAGEMENT CONTROLS

A. MSA has established a management control system that provides multi-layered, in-depth management oversight of the public health and management activities carried out by IPP. The management control system also provides MSA 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, MSA Central Office (CO) will review IPPS assessment results and provide appropriate feedback as follows:

1. The MSA Assistant Director reviews 10 percent of IPPS assessments conducted by each CM.
2. The MSA Director reviews 10 percent of IPPS assessments reviewed by the conducted by the MSA Assistant Director.

VI. IPPS AND THE PERFORMANCE MANAGEMENT SYSTEM

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

1. Is designed to provide CM 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. CM 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.

C. The IPPS Assessment Form does not replace any existing performance appraisal processes or MSA forms. CM are to continue to use CAPPs to set performance expectations, conduct progress reviews, and evaluate employees annually on their performance.

VII. TIMEFRAMES FOR CONDUCTING REQUIRED IPPS ASSESSMENTS

A. CM, at their discretion, may conduct more than two IPPS assessments during the rating year. CM 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 CM 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 MSA policies; and
2. Duties performed by IPP are in accordance with prescribed inspection methods and procedures.

B. CM 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. **Plan and Prepare for IPPS Assessment.** Preparation is an important aspect of any IPPS assessment. Before conducting the IPPS assessment, the CM 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 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 2 outlines PHIS reports and other data sources CM can use to prepare for an IPPS visit. CM 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 CM insight into the decisions that the inspector makes regarding which procedures to perform and at what frequency. The CM 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 CM are to review before an IPPS visits include:

- a. Review noncompliance records to determine whether the NRs are being written in accordance with MSA Directive 5000.1, *Verifying an Establishment's Food Safety System*.
 - b. Use the electronic Animal Disposition Report from PHIS to determine whether the inspector is keeping the data current and is performing the appropriate humane handling procedures. The CM 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 CM 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, CM are to make sure that the employee has completed the remedial assigned activities prescribed at the time of the prior IPPS assessment. CM are to also reassess the elements and sub-elements on which follow-up was indicated.
 5. Identify new MSA directives and notices that are relevant to the employee's assignment and position. In addition, CM 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

X. METHODS FOR CONDUCTING AN IPPS ASSESSMENT

A. In general, CM 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 appropriate 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 MSA 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. CM are to properly plan, prepare, and execute the plan to document an effective IPPS assessment.

NOTE: A CM does not have to conduct IPPS visits at all establishments on an employee's assignment. However, the CM 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 CM 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 CM is to meet with the employee at the end of the assessment and provide verbal feedback on performance.

E. The CM is to complete the IPPS Assessment Form. The CM is to state whether the employee's understanding and ability to execute regulatory requirements was satisfactory using Yes or No. A CM can document positive performance briefly in the narrative boxes. If the CM 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 CM 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 CM is to provide training, mentorship, or other performance management action(s), when an employee's performance is unacceptable in one or more critical elements at any time during the performance appraisal cycle.

I. The CM is to contact the CO for further guidance if misconduct issues are identified during the IPPS visit.

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

K. The CM 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

A CM can download the fillable PDF IPPS Assessment Form via the DSHS MSA SharePoint website.

XII. QUESTIONS

Refer questions through supervisory channels.



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POSITIONS COVERED BY IPPS – ATTACHMENT 1

1. *Inspector IV*
2. *Inspector V*
3. *Inspector VI*

DATA SOURCES FOR IPPS PREPARATION – ATTACHMENT 2

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>	<p>Noncompliance Records for an Establishment</p> <p>Task Summary and List for an Establishment</p> <p>Tasks Regulation Verified and Noncompliant Summary for an Establishment</p>	<p>Establishment Profile</p> <p>Inspection Verification Results</p>
<i>HACCP</i>	<p>HACCP Sets for an Establishment</p> <p>Noncompliance Records for an Establishment</p> <p>Task Summary and List for an Establishment</p> <p>Tasks Regulation Verified and Noncompliant Summary for an Establishment</p>	<p>Establishment Profile</p> <p>Inspection Verification Results</p>
<i>Sampling</i>	<p>In-Plant Residue Sampling Results for an Establishment</p> <p>Task Summary and List for an</p>	<p>Establishment Profile</p> <p>Inspection Verification Results</p>

	<p>Establishment</p> <p>Sample Collection Status for an Establishment</p> <p>Sampling Form Results for an Establishment</p> <p>Sampling Results for an Establishment</p> <p>Sampling Schedule History for an Establishment</p> <p>Sampling Schedule History with Results for an Establishment</p> <p>Positive Sampling Results: HACCP</p>	
<i>AM/PM Duties</i>	<p>Pending Dispositions for an Establishment</p> <p>Noncompliance Records for an Establishment</p> <p>Missing Poultry Weights for an Establishment</p> <p>Slaughter Daily Totals Worksheet for an Establishment</p> <p>Slaughter Zero Head Count for an Establishment</p>	<p>Establishment Profile</p> <p>Animal Disposition Reporting</p> <p>Disposition Records</p>
<i>Humane Handling</i>	<p>HATS Detail and Summary for an Establishment</p> <p>Noncompliance Records for an Establishment</p> <p>Task Summary and List for an Establishment</p>	<p>Inspection Verification Results</p>

	<p>MOIs for Good Commercial Practice and Humane Handling for a District</p> <p>Good Commercial Practice Validation for an Establishment</p> <p>HATS Validation Report for an Establishment</p>	
<p><i>Economic Adulteration and Labeling Verification</i></p>	<p>Noncompliance Records for an Establishment</p> <p>Task Summary and List for an Establishment</p> <p>Tasks Regulation Verified and Noncompliant Summary for an Establishment</p>	<p>Inspection Verification Results</p>