

**Montana Department of Livestock
CIS Timeline**

<u>Date</u>	<u>Action</u>	<u>Result</u>
10-Sep-21	CIS application Submitted	Application Received by FSIS
10-Sep-21	Application Proof Submitted	Application Received by FSIS
24-Sep-21	Initial Feedback From FSIS	Email identifying Shortcomings
20-Oct-21	Initial Determination From FSIS	Email identifying need for laboratory with proper accreditation
Oct -Dec	Looked for a Laboratory -- Sent samples to SD to see if the relationship would work.	Started working with SD State University Laboratory
10-Jan-22	Contacted SD State University Laboratory in an effort to solidify the relationship	Letter sent to Montana officially agreeing to conduct CIS Sampling
24-Jan-22	Received an Email from FSIS indicating that they are now waiting on the 2021 final audit determination	Email
27-Jan-22	Submitted remainder of follow-up information for audit	Awaiting Final Determination

STATE OF MONTANA

GREG GLANFORTE, GOVERNOR

MT DEPARTMENT OF LIVESTOCK

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HELENA, MONTANA 59620-2001
(406) 444-7323/FAX (406) 444-1929
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ANIMAL HEALTH & FOOD SAFETY DIVISION (406) 444-2043
BRANDS ENFORCEMENT DIVISION (406) 444-2045
CENTRALIZED SERVICES DIVISION (406) 444-4994
EXECUTIVE OFFICE (406) 444-9321

September 10, 2021

FSIS District Office
1 Denver Federal Center
Bldg. 45, Door S3
P.O. Box 25387
Denver, CO 80225

Dear DO,

The State of Montana is seeking to participate in the Cooperative Interstate Shipment program. There are several establishments interested in the program and Montana MPI can provide the necessary inspection services to selected establishments in the State and to conduct any related activities required under the CIS program (9 CFR 332.4(b)(2) and 381.514(b)(2)). In selected establishments, Montana MPI is capable and prepared to operate in a "same as" manner.

Montana establishments intend to produce beef, pork, and lamb and under the following HACCP categories while participating in the program:

- Raw Intact
- Raw non-intact
- Heat treated, not fully cooked, not shelf stable
- Fully cooked, not shelf stable
- Heat treated not shelf stable
- Not heat treated shelf stable
- Heat treated shelf stable

A. **Legal Authority:** The Office of Policy and Program Development (OPPD) SME is to verify that the State's request includes the following documentation to demonstrate that the State has the necessary legal authority to administer and enforce a "same as" CIS program:

1. A copy of a state law that incorporates the FMIA or PPIA and the implementing regulations explicitly or by reference;

EQUAL EMPLOYMENT OPPORTUNITY

It is the policy of the State of Montana that state government is an equal employment opportunity employer and does not discriminate in employment based upon race, color, national origin, age, physical or mental disability, marital status, religion, creed, sex, genetic, military service, sexual orientation or political beliefs. Montana state government is committed to providing equal opportunity in all aspects of employment and equal access to its programs, services, and activities. EEO/ADA OFFICER 406-444-5684

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

The Montana Meat and Poultry Inspection program enforces the provisions of the FMIA, PPIA, and HMSA, through Montana Code Annotated sections 81-9-216 through 81-9-220 and 81-9-226 through 81-9-236, which may be cited as the "Meat and Poultry Inspection Act". The Acts are cited directly in section 81-9-219.

Montana Code Annotated

81-9-219. Application. *The provisions of 81-9-216 through 81-9-220 and 81-9-226 through 81-9-236 apply to persons, establishments, animals, and articles regulated under the Federal Meat Inspection Act, 21 U.S.C. 601 through 695, the federal Poultry Products Inspection Act, 21 U.S.C. 451 through 470, as those acts read on March 27, 2013, or the federal Humane Methods of Slaughter Act of 1978, 7 U.S.C. 1901, 1902, 1904, 1906, and 1907, as that act read on March 27, 2007, only to the extent provided for in the federal acts.*

2. A copy of a law that gives State inspection personnel the authority to enforce Federal food safety standards for purposes of the CIS program;

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

The Department adopts by reference CFR regulations for food safety standards in Administrative Rules of Montana section 32.6.712. The regulations are enforced by inspection personnel in official establishments.

Administrative Rules of Montana

32.6.712 FOOD SAFETY AND INSPECTION SERVICE (MEAT, POULTRY)

(1) The Department of Livestock incorporates by reference:

- (a) 9 CFR 300.1 through 9 CFR 321.3;**
- (b) 9 CFR 325 through 9 CFR 325.21;**
- (c) 9 CFR 329.1 through 9 CFR 329.9;**
- (d) 9 CFR 352 through 9 CFR 362.5;**
- (e) 9 CFR 381.1 through 9 CFR 381.103;**
- (f) 9 CFR 381.190;**
- (g) 9 CFR 381.194;**
- (h) 9 CFR 381.115 through 9 CFR 381.182;**
- (i) 9 CFR 381.210 through 9 CFR 381.218;**
- (j) 9 CFR 381.300 through 9 CFR 381.524; and**
- (k) 9 CFR 416.1 through 9 CFR 500.8.**

3. A legal opinion from the State Attorney General that confirms that State inspection personnel have such authority; or

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

Montana MPI is currently seeking an opinion from the Montana State Attorney General that will confirm that Montana has the authority to carry out FSIS food safety regulations in a "same as" manner.

STATE OF MONTANA

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4. Any other documents that demonstrate that the State MPI program is authorized to administer and enforce Federal food safety standards in establishments selected for the CIS program. The OPPD SME is to verify that the State has the authority to enforce Federal food safety standards in the same manner that FSIS is authorized to act under the FSIS Rules of Practice in 9 CFR Part 500. If the State has not incorporated the FSIS Rules of Practice explicitly or by reference the OPPD SME is to verify that the State designated personnel are otherwise authorized to take actions that are the same as those provided for in the FSIS Rules of Practice.

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

Montana MPI has the authority to enforce federal food safety standards in the same manner that FSIS, as prescribed in the FSIS Rules of Practice in 9 CFR Part 500. Montana adopts the FSIS rules of practice from 9 CFR Part 500 in Administrative Rules of Montana section 32.6.712 (1) (k) (see attachment). These regulations are enforced by the Bureau Chief, and EIAO staff.

32.6.712 FOOD SAFETY AND INSPECTION SERVICE (MEAT, POULTRY)

(1) The Department of Livestock incorporates by reference:

(k) 9 CFR 416.1 through 9 CFR 500.8.

- B. **Computer Systems and Forms:** The Office of the Chief Information Officer (OCIO) SME is to verify that the State's request includes documentation to demonstrate that the State intends to use the Public Health Information System (PHIS) to administer the CIS program.

1. If the State is not using PHIS when it submits its request to participate in the CIS program, the State will need to transition to PHIS as a condition for entering into a CIS program agreement. In its request for a CIS program, a State is required to agree to develop a plan to transition to use of PHIS in selected establishments.

2. A State may be authorized to participate in the CIS Program prior to PHIS implementation; however, no establishment will be selected by FSIS into the CIS program until the State has implemented use of PHIS in that establishment.

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

Montana MPI does use and would continue to use the Public Health Information System (PHIS). The state has used this system since 2014. Currently, all state inspectors are using FSIS issued laptops with access to PHIS at all state inspected establishments. Montana requires new staff to obtain credentials for LincPass in their first six months of employment.

EQUAL EMPLOYMENT OPPORTUNITY

It is the policy of the State of Montana that state government is an equal employment opportunity employer and does not discriminate in employment based upon race, color, national origin, age, physical or mental disability, marital status, religion, creed, sex, genetic, military service, sexual orientation or political beliefs. Montana state government is committed to providing equal opportunity in all aspects of employment and equal access to its programs, services, and activities. EEO/ADA OFFICER 406-444-5684

C. **Laboratory Services:** The Office of Public Health Science (OPHS) laboratory method SMEs are to verify that the State's request contains documentation to demonstrate that the laboratory services that the State intends to use to analyze regulatory food chemistry and microbiological samples under the CIS program have or are actively seeking to be accredited by an internationally recognized organization that accredits food testing laboratories against the International Standards Organization (ISO) document 17025, "General requirements for the competence of testing and calibration laboratories," and against the Association of Official Agricultural Chemists (AOAC) International document "Guidelines for Laboratories Performing Microbiological and Chemical Analyses of Food, Dietary Supplements, and Pharmaceuticals" written by the Analytical Laboratory Accreditation Criteria Committee (ALACC).

1. If the laboratory services that the State intends to use for the CIS program are ISO 17025 accredited, verify that the State's request includes an authentic copy of the ISO certificate and other documentation to demonstrate that the laboratory has the necessary accreditation; or
2. If the laboratory services that the State intends to use for the CIS program are not ISO 17025 accredited, verify that:
 - a. The laboratory is actively seeking, and has provided a timeline for obtaining, ISO 17025 accreditation within 2 years; and
 - b. The laboratory has demonstrated that it can meet the criteria in the State Meat and Poultry Inspection Program Laboratory Quality Assurance (QA) Checklist while it seeks to obtain ISO 17025 accreditation.

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

The Montana MPI program currently samples at the FSIS recommended frequencies. Product sample testing is performed by the Montana Public Health Laboratory located in Helena. This laboratory has demonstrated for over ten years that it can meet the criteria found in the State Meat and Poultry Inspection Program Quality Assurance Checklist as part of the Department's self-assessment documentation for "equal to" status.

However, this lab is not ISO 17025 accredited and has no plans to actively seek this accreditation in the next two years. If FSIS will not accept this laboratory's methods and service requirements as previously accepted for Montana's "equal to" status since 2005, another laboratory with the ISO 17025 accreditation will be located and an agreement made with the state for product sampling before CIS program ~~is~~ could be approved.

D. **Laboratory Methods:** The OPHS laboratory method SMEs are to verify that the State's request contains documentation to demonstrate that the laboratory that the State intends to use to analyze samples for the CIS program will follow the applicable protocols described in the FSIS Chemistry, Microbiology, and Pathology Laboratory Guidebooks.

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1. If the laboratory cannot follow an FSIS method as written, verify that the State has submitted a justification to modify an FSIS method and that OPHS laboratory method SMEs have reviewed any modifications made to the FSIS method, and determined that the methodology is consistent with the original FSIS protocol. The State's method is to be capable of achieving results that are consistent with the corresponding FSIS method;
2. If a State's laboratory is ISO 17025 accredited, but some of the analyses that it conducts are not under its scope of accreditation, the State may still qualify for a CIS Program if the laboratory can demonstrate proficiency in FSIS Laboratory Guidebook methods, and the laboratory agrees to actively seek and obtain scope of accreditation for the analyses during the next accreditation cycle; or 3. Inquiries from States or laboratories on laboratory accreditation or methods should be submitted to OPHS through the following e-mail address: statelabinquiry@usda.gov.

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

The Montana State Health Laboratory is not ISO 17025 accredited but operates at an "at least equal to" manner and has done so for many years. The laboratory does not have any plans to operate utilizing an ISO 17025 accreditation. However, if selected for the Cooperative Interstate Shipment program, Montana MPI will utilize an ISO 17025 accredited laboratory in another state that conducts laboratory methods the "same as" manner.

- E. **Sample Collection:** The OPHS sample collection SMEs are to verify that the State's request includes documentation to demonstrate that designated State personnel utilizing the same collection methods as FSIS will collect the same number and type of regulatory samples from selected establishments in the State that FSIS collects from official Federal establishments. Reviewers are to:
1. Verify that the State developed its sampling plan using the same algorithm that FSIS uses to determine the number and type of microbiological samples to collect each year; and

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

Montana MPI follows the "FSIS Guidance to States on Frequency of Microbiological Testing" each year to set the directed number of samples requested for establishments. If the directed sample cannot be collected in a 30-day period, a second request for the same sample is directed the following month to ensure that recommended frequencies are met.

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2. Verify that the State developed its sampling plan using the same algorithm that FSIS uses to determine the number and type of chemical residue samples to collect each year.

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

Montana MPI follows the guidance outlined in FSIS Directive 10800.1, Rev 1 for residue testing of show animals per lot size. The state uses KIS testing whenever show animals are presented, or if staff suspects an animal or notices an injection site. The state uses FSIS laboratories for any follow up testing resulting from a positive KIS swab test at a state establishment. Montana also participates in National Residue Program sampling directed through PHIS. Inspection staff collect samples as directed if and/or when the species and lab are available.

F. **Staffing:** The OFO SMEs are to verify that the State's CIS program request includes the following documentation to demonstrate that the State MPI program has staffing sufficient to conduct the same inspection activities in selected establishments as FSIS conducts in official Federal establishments:

1. The method that the States will use to assign inspectors, including veterinarians, to each selected establishment in the State.
 - a. If selected establishments in the State will be conducting slaughter activities, verify that the State can staff livestock slaughter at the level provided for in 9 CFR 310.1 or poultry slaughter at the level provided for in 9 CFR 381.68 and 381.76; and
 - b. If selected establishments in the State will be conducting processing activities, the CIS program coordinator and the DO are to verify that the State will be able to assign a designated State inspector to all selected processing establishments on a per-shift basis whenever each establishment is conducting activities requiring inspection.

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

Official establishments have an approved schedule and an inspector assigned to fulfilling all inspection requirements at that plant. All slaughter inspections are performed in accordance with 9CFR 310.1 and the equivalent CFR 381 poultry regulations. State inspected slaughter plants never slaughter "under inspection" without an inspector present for the entire process. All processing inspections are scheduled and performed by IPP according to the plants approved schedule.

2. The methods that the State will use to determine the inspectors' workloads and assignments;

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

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The inspectors' workloads are routinely evaluated by supervisors and bureau leadership to ensure that they can properly perform all inspections assigned to them. Appropriate timeframes are predicted for inspections by analyzing plants production schedules and volumes. Supervisors routinely evaluate the performance of IPP and ensure proper inspections are being carried out.

3. The methods that the State will use to verify achievement of adequate staffing; and

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

Calendars are used by all supervisors to ensure inspection coverage is maintained at all plants. Supervisors maintain close contact with inspectors to determine if any relief inspection will be needed. To maintain an adequate number of relief inspectors, bureau leadership monitors staffing levels and seeks out additional inspectors when needed. New inspector hiring and training is conducted when an inspector leaves his or her position as part of an effort to maintain adequate staffing levels.

4. The method that the State will use to ensure relief inspection coverage in the selected establishments

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

Montana currently has three relief inspector positions that are utilized when necessary to carry out inspection assignments. Each district has an assigned relief inspector position to fulfill any needed inspections. Specific relief inspection calendars have been developed in Microsoft Outlook and are used whenever a regular assigned inspector is unavailable.

G. Training: The Office of Employee Experience and Development (OEED), Center for Learning (CFL) SME is to verify that the designated State personnel have completed and passed the minimum FSIS-sponsored training requirements necessary for the State to begin to administer a CIS program. The State is responsible for ensuring that assignments for designated State personnel are based on the training that the State personnel have completed. FSIS requires designated State personnel to complete training courses administered by FSIS.

1. Upon request, OEED CFL is to provide a list of the current FSIS sponsored trainings to the requesting State through the DM. The list is to include former FSIS trainings that satisfy the requirement in lieu of the current training courses offered.

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MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

The following FSIS sponsored training courses have been attended by inspection staff:

Virtual Inspection Methods 1805- All inspectors, Supervisors, Label Specialist, Compliance Investigators, EIAO

Virtual Further Processing & Labeling- EIAO

Further Processing & Labeling (in-person)- Label Specialist

Virtual EIAO 6000- Three district supervisors, Senior Compliance Investigator, EIAO

Virtual SIEMS Training- Montana MPI's Western compliance investigator

In-person SIEM training – Montana MPI's senior compliance investigator

Montana MPI intends to utilize the newest FSIS virtual course on livestock slaughter when it is released in virtual format. That course is rumored to be available as early as October 2021. All inspection staff, including the EIAO, label specialist and compliance investigators will attend this course as it becomes available.

2. OEED CFL reviewers are to verify that State inspection personnel have completed the necessary FSIS training(s) prior to providing inspection services to establishments selected for the CIS program, with the exception of the FSIS livestock and poultry slaughter inspection trainings. Reviewers are to be aware that those personnel assigned to provide CIS slaughter inspection must complete and pass the FSIS slaughter training within 12 months of beginning inspection at such establishments, which is consistent with the training required for assigned personnel at a federally inspected establishment.

MONTANA DEPARTMENT OF LIVESTOCK RESPONSE:

All inspection staff have completed the Virtual Inspection Methods course offered by FSIS. Although this training has an on-the-job training component, that portion of the training has not been completed for Montana MPI inspectors. Montana anticipates that this portion of the training will be completed by Spring of 2022. This is primarily due to the fact that Montana's EIAO is a recent hire and will develop and deliver this portion of the training when her training is complete.

Thank you for the opportunity to apply to participate in the Cooperative Interstate Shipment Program. Montana MPI is committed to providing inspection services at selected CIS establishments in a "same as" manner.

Best Regards,

Gary J. Hamel, State Director
Montana Meat and Poultry Inspection

MCA Contents / TITLE 81 / CHAPTER 9 / Part 2 / 81-9-219 Application

Montana Code Annotated 2019

TITLE 81. LIVESTOCK

CHAPTER 9. SLAUGHTER

Part 2. Slaughterhouses Meat and Poultry Inspection

Application

81-9-219. Application. The provisions of **81-9-216** through **81-9-220** and **81-9-226** through **81-9-236** apply to persons, establishments, animals, and articles regulated under the Federal Meat Inspection Act, 21 U.S.C. 601 through 695, the federal Poultry Products Inspection Act, 21 U.S.C. 451 through 470, as those acts read on March 27, 2013, or the federal Humane Methods of Slaughter Act of 1978, 7 U.S.C. 1901, 1902, 1904, 1906, and 1907, as that act read on March 27, 2007, only to the extent provided for in the federal acts.

History: En. Sec. 16, Ch. 577, L. 1987; amd. Sec. 1, Ch. 65, L. 2007; amd. Sec. 1, Ch. 92, L. 2013.

Created by **LAWSH**

32.6.712 FOOD SAFETY AND INSPECTION SERVICE (MEAT, POULTRY)

(1) The Department of Livestock incorporates by reference:

- (a) 9 CFR 300.1 through 9 CFR 321.3;
- (b) 9 CFR 325 through 9 CFR 325.21;
- (c) 9 CFR 329.1 through 9 CFR 329.9;
- (d) 9 CFR 352 through 9 CFR 362.5;
- (e) 9 CFR 381.1 through 9 CFR 381.103;
- (f) 9 CFR 381.190;
- (g) 9 CFR 381.194;
- (h) 9 CFR 381.115 through 9 CFR 381.182;
- (i) 9 CFR 381.210 through 9 CFR 381.218;
- (j) 9 CFR 381.300 through 9 CFR 381.524; and
- (k) 9 CFR 416.1 through 9 CFR 500.8.

(2) These regulations set forth the federal rules on meat and poultry inspection with the following exceptions and clarifications thereto:

- (a) Any reference to the "U.S. Department of Agriculture" will mean the "Montana Department of Livestock."
- (b) Any reference to "U.S. inspected and passed" will mean "Montana inspected and passed."
- (c) Any reference to "U.S. passed for cooking" will mean "Montana passed for cooking."
- (d) Any reference to "U.S. passed for refrigeration" will mean "Montana passed for refrigeration."
- (e) Any reference to "U.S. inspected and condemned" will mean "Montana inspected and condemned."
- (f) Any reference to "U.S. retained" will mean "Montana retained."
- (g) Any reference to "U.S. suspect" will mean "Montana suspect."
- (h) Any reference to "U.S. condemned" will mean "Montana condemned."
- (i) Any reference to "regional director" will mean the official in charge of the program within a particular region.
- (j) Any reference to "U.S.D.A. food inspector" will mean "Montana meat inspector."
- (k) Any reference to "U.S.D.A. approval for export" will mean "Montana approval for export."
- (l) Any reference to "U.S.D.A. letterhead and seal" will mean the "state of Montana letterhead and seal."
- (m) Any reference to "U.S. rejected" will mean "Montana rejected."
- (n) Any reference to "U.S.D.A. inspection legend" will mean "Montana inspection legend."
- (o) Any reference to the "Standards and Labeling Division, Meat and Poultry Inspection Technical Services, in Washington, D.C." will mean the "Montana Department of Livestock."
- (p) Any reference to "inspector in charge, Meat and Poultry Inspection Program, Food Safety and Inspection Service, U.S.D.A." will mean "chief inspector in charge, Meat and Poultry Inspection Program, Montana Department of Livestock."
- (q) Any reference to "U.S. government seals" will mean "state of Montana seals."
- (r) Any reference to the "Department of Agriculture or divisions thereof in Washington, D.C." will mean "Montana Board of Livestock acting through Montana Department of Livestock" in Helena, Montana.
- (s) Any reference to "Compliance Staff, Meat and Poultry Inspection Field Operations, Food Safety and Inspection Service, U.S.D.A., Washington, D.C. 20250" will mean "Chief Inspector in Charge, Meat and Poultry Inspection Program, Montana Department of Livestock, P.O. Box 202001, Helena, Montana 59620-2001."
- (t) Any reference to "federally inspected and passed" will mean "Montana inspected and passed."
- (u) Any reference to "federal meat inspection" will mean "state meat inspection."
- (v) Any reference to "Treasurer of the United States" will mean "Montana Department of Livestock."
- (w) Any reference to "general services administration" will mean "Montana Department of Livestock."
- (x) Any reference to "secretary" will mean the "Montana Board of Livestock or its delegate."
- (y) Any reference to "food safety and inspection service" will mean the "chief inspector in charge, Meat and Poultry Inspection Program, Montana Department of Livestock."
- (z) Any reference to "overtime and holiday inspection service" shall be subject to those provisions set forth by the state of Montana for those individuals deemed to be "public employees."

- (aa) Any reference to "hearing clerk of the food safety and inspection service" will mean "chief inspector in charge, Meat and Poultry Inspection Program, Montana Department of Livestock."
- (ab) Any reference to the "U.S. court of appeals for the District of Columbia" will mean "district court of the state of Montana."
- (ac) Any reference to "imported into the United States" will mean "imported into the state of Montana."
- (ad) Copies of the above are on file with the Department of Livestock and may be reviewed at that office. In addition, copies of each document are available from the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402 for a fee by requesting the appropriate rule number(s).
- (ae) Any reference to the word "act" will mean the Montana "Meat and Poultry Inspection Act."
- (af) Any reference to the term "administrator" will mean the "chief inspector in charge, Meat and Poultry Inspection Program, Montana Department of Livestock."
- (ag) Any reference to the term "program" will mean the Montana "Meat and Poultry Inspection Act."
- (ah) Any reference to the term "circuit supervisor" will mean the "meat inspector designated to inspect meat in a particular circuit" or "area."
- (ai) Any reference to specific provisions of federal law will mean specific provisions of corresponding laws of the state of Montana.
- (3) The Code of Federal Regulations is available for review at the Montana State Law Library, 215 North Sanders in Helena or online at www.ecfr.gov.

Attachment 6

State MPI Employee Primary Roles
Suggested Format

Name of State Agency:		As of Date:		
MONTANA Dept of Livestock Meat & Poultry Inspection		September 25, 2020		
# State MPI employees		Total:		
Instruction	In the section below, list each employee only once. If the employee has multiple roles, identify the employee under their primary role only and provide details of additional roles in the adjacent comment box.			
	Employee Roles	Full time	Part time	Comments
Headquarters/ Central Office	Managers	1		
	Administrative	1		
	EIAOs	1		vacant as of 8/28/20
	VMO/PHVs			
	Other	1		label specialist
Circuit/Area/ District/Etc.	Field Supervisors	3		
	VMO/PHVs			
	Other			
In-Plant State Inspection	VMO/PHVs			
	Inspectors	13		
	Relief	3		
	Other			
CIS, CU, or TA Inspection	VMO/PHVs			
	Inspectors			
	Relief			
	Other			
Compliance Program	Managers			
	Compliance Officers	2		
	Other			
Remarks:				

FY20

Montana - Sampling Activity Table

	# of Ests eligible for sampling at start of FY20	# of samples targeted per Est	Total # of samples state actually requested	Total # of viable samples tested	Number of confirmed POSITIVES
MT43 - <i>E.coli</i> O157:H7 in all raw ground beef products	18	6	109	105	0
MT60 - <i>E.coli</i> O157:H7 and STECs in bench trim (onsite slaughter)	14	4	49	46	1
MT64 - <i>E.coli</i> O157:H7 in components other than trim	0	2	0		
MT65 - <i>E.coli</i> O157:H7 in bench trim from purchased source	10	2	20	17	0
MT44 - Follow up testing for positive MT43 - <i>E.coli</i> O157:H7 in all raw ground beef products			0		0
MT52 - Follow up testing of beef trim or other components (onsite slaughter) based on MT43 positive - <i>E.coli</i> O157:H7 in all raw ground beef products			0		0
MT53 - Follow up testing for positive MT60 or MT52 - <i>E.coli</i> O157:H7 and STEC	1		8	8	0
<i>Combined Random/Risk</i>					
RTEPROD Random - <i>Listeria Monocytogenes</i> and <i>Salmonella</i> in RTE products not due to risk	24	6	121	111	0
RTEPROD Risk - <i>Listeria Monocytogenes</i> and <i>Salmonella</i> in RTE products - risk based post lethality exposed					
RLm - <i>Listeria Monocytogenes</i> - risk based in RTE products			15	15	0
IVT - <i>Listeria Monocytogenes</i> - risk based in RTE products					0

Montana does no poultry sampling due to low volumes.

FY21 Circuit East03 - Sampling

Circuit	Est #	Name	IIC	MT43	MT44	MT64	MT65	MT60	MT59	BISON TRIM	RTEPROD Random / High	Risk Level	NRP	KIS Test
03	15	S & T Project Meats	Lorri Hammond	Routine risk based sampling for E.coli 0157:H7 in raw ground beef, hamburger, and beef patties from source materials that does NOT contain other components as head meat, cheek meat, etc.	Follow up testing for a positive MT43	Routine testing of Raw ground beef, hamburger, and beef patties with components other than trim (head or cheek meat, hearts, etc.) from animals slaughtered ONSITE for E.coli 0157:H7	Routine testing of ALL PURCHASED beef, may be manufactured trim, other components, ground, including boxed beef from "out-of-country" onsite for E.coli 0157:H7 that is intended for non-intact products	Routine testing of Beef Manufactured Trim / boneless beef, primal cuts, etc. intended for raw non-intact use for E.coli 0157:H7 and 6 Non-0157 STECs originating from beef SLAUGHTERED-ONSITE	Follow up testing for a positive MT60, MT64, or MT65	Routine testing of Bison Manufactured Trim, boneless or primal cuts intended for RAW/NON-INTACT use for E.coli 0157:H7 and 6 Non-0157 STECs from bison slaughtered onsite	Sampling for Listeria and Salmonella in Ready-to-Eat meat & poultry products: Combined Random & Risk based	6.10	National Residue Testing, Directed through PHIS Alerts	Residue kidney swab test for show animals, or animal with suspected infection site
03	021	Bear Paw Meats	Kathl Molynaux	6 per year			2 per year	6 per year			6 per year	6.10	As directed	As requi
03	025	Cowboy Meat Co	Lorri Hammond	6 per year			2 per year	6 per year			6 per year	6.10	As directed	As requi
03	122	Discount Meats	Vanessa Thompson	6 per year			2 per year				6 per year	5		
03	132	Luz's Mexican Food	Vanessa Thompson								6 per year			
03	164	Craig's Meat Processing	Rom Hedges								6 per year		10	
03	80	Meat & Poultry Palace	Lorri Hammond								> 2 per year		8	

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0583-0170. The time required to complete this information collection is estimated to average 113 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

US Department of Agriculture
Food Safety Inspection Service
Office of Public Health Safety

STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST

This checklist is intended to help laboratories improve the quality of their testing programs with regard to meat and poultry testing samples, in order to ensure those laboratories are "at least equal to" the U.S. Department of Agriculture, Food Safety and Inspection Service Field Service Laboratories. The laboratory management should strive to ensure that policies and procedures are written and each laboratory meets the elements listed herein. All quality system documentation and supporting records must be available for the assessor's review.

DATE OF REVIEW:

STATE MPI PROGRAM:

LABORATORY NAME:

LABORATORY ADDRESS:

CITY: STATE: ZIP:

LABORATORY DIRECTOR/POINT(S) OF CONTACT:

Debbie Gibson, MPH, MT (ASCP)

LABORATORY REPRESENTATIVE(S) AT REVIEW:

Kimberly Newman, MT (ASCP)

REVIEWER(S):

FOR USE AS A SELF ASSESSMENT TOOL, PARTICIPATING LABORATORY PERSONNEL ARE TO COMPLETE AND SUBMIT TO FSIS AS PART OF THEIR ANNUAL SUBMISSION PACKAGE.

1. Instead of completing its own testing, does the State have a partnership with another State, private laboratory or federal laboratory meeting all MPI requirements to maintain some or all testing capability for MPI purposes? If YES, describe the relationship below: Yes No N/A

**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

2. Does the laboratory subcontract any MPI related analyses with one or more private or non CIS/MPI state laboratories? If YES provide the name of each facility with physical address, phone number and main point(s) of contact. Also, list the analyses or tests that each subcontracted laboratory performs.

Yes No N/A

NOTE: For example, any work including confirmation/titration or serology/serotyping that is performed offsite or by another lab is considered subcontracted and must be listed. Detailed written documentation, e.g., MOU or contract, between laboratories to perform the work must be provided. Each laboratory shall submit the completed checklist and requested information.

3. For laboratories performing analysis for MPI purposes:

a) Is the laboratory accredited to ISO/IEC 17025?

Yes No N/A

b) Are all methods used by the laboratory in support of the MPI program included in the scope of accreditation?

Yes No N/A

SKIP to page 9, question 38, if the answers to 3a and 3b are yes.

NOTE: All laboratories must still comply with the listed QA checklist requirements.

**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

A. MANAGEMENT GUIDELINES

4. Does the laboratory follow a written quality management system to meet the requirements of FSIS and the regulatory authorities of the State? Yes No N/A
-
5. Does the laboratory quality system cover all work carried out at sites away from its permanent facilities and/or in associated temporary or mobile facilities, as well as all work carried out in the laboratory's permanent facilities? Yes No N/A
-
6. Does the laboratory follow a written policy that identifies the responsibilities, authority and interrelationships of all key personnel who may influence or be involved in the testing activities of the laboratory in order to prevent any potential conflicts of interest? Yes No N/A
-
7. Does the laboratory have managerial and technical personnel with both the authority and the resources needed to carry out their duties? Yes No N/A
-
8. Does the laboratory have managerial and technical personnel with both the authority and resources to identify departures from their quality system and to initiate actions to prevent or minimize any such departures? Yes No N/A
-
9. Does the laboratory follow written procedures to ensure that all of its personnel, including management, are free from any undue internal and external pressures and influences that may adversely affect the quality of their work? Yes No N/A
-
10. Does the laboratory follow written procedures to control all documents that form part of its quality system, e.g., regulations, methods, software, instructions, standards, and manuals, including procedures for:
- a) Ensuring prior approval of all documents? Yes No N/A
 - b) Ensuring periodic review of all documents? Yes No N/A
 - c) Ensuring that any changes to documents are approved? Yes No N/A
 - d) Ensuring that only the current revision is being used? Yes No N/A
 - e) Ensuring suitable markings of retained obsolete documents? Yes No N/A

**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

11. Does the laboratory verify that supplies comply with the standard specifications or requirements defined in the methods concerned? Yes No N/A
-
12. Does the laboratory follow written policies and procedures detailing the acceptable handling of nonconforming work or any departures from the policies and procedures in either their quality system or technical operations:
- a) That identify the responsibilities and authorities for the management of nonconforming work? Yes No N/A
- b) That identify the actions to be taken when nonconforming work is identified (including the halting of work and withholding of test reports, as necessary)? Yes No N/A
- c) That require corrective actions be taken immediately, together with any decision about the acceptability of the nonconforming work, including notifying the client (if necessary)? Yes No N/A
- d) That include the monitoring of results to ensure that the corrective actions taken have been effective? Yes No N/A
- e) That identify needed improvements and potential sources of nonconformance, and do they take preventive action to reduce the likelihood of the occurrence of such non-conformances? Yes No N/A
-
13. Does the laboratory follow a written system and have supporting records that ensures test samples are traceable to equipment, critical supplies, and personnel from receipt through disposal of sample reserves? Yes No N/A
-
14. Are all records legible, held secure and in confidence for a defined period and retained in a suitable environment to prevent alteration, damage, deterioration, and/or loss? Yes No N/A
-
15. Does the laboratory follow written procedures to ensure that any mistakes occurring in records are not deleted, or otherwise made illegible, but instead are crossed out and the correction entered alongside, with the person making the correction, signing or initialing and dating the change? Yes No N/A
-
16. Does the laboratory follow written procedures to ensure that all observations, data, and calculations are recorded at the time they are made and are identifiable to a specific task? Yes No N/A

**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

B. TECHNICAL GUIDELINES

17. Do the observations, data and calculations contain sufficient information to help facilitate identification of factors that may either affect the uncertainty and/or enable the test to be repeated under conditions as near to the original as possible? Yes No N/A
-
18. Does the laboratory follow written policies and procedures for identifying training needs and providing training of personnel? Yes No N/A
-
19. Are training/education/experience records for all technical personnel available? Yes No N/A
-
20. Does the laboratory follow written policies and procedures to ensure that the environmental conditions do not invalidate the test results or otherwise adversely affect the required quality of any measurement or test, e.g., maintaining separation between areas with incompatible activities, ensuring good housekeeping in the lab, conductivity/resistivity testing of DI water, and where applicable, monitoring environmental conditions such as temperature, humidity, biological sterility, and dust)? Yes No N/A
-
21. Does the laboratory follow written policies and procedures to ensure that only test methods and procedures that are fit for purpose are used and justified, authorized, validated, and documented? Yes No N/A
-
22. Does the laboratory follow written policies and procedures to validate/verify the performance of authorized methods as written, and to ensure confirmation of this fact prior to using the methods? Yes No N/A
-
23. Does the laboratory follow written procedures to ensure that all calculations and data transfers are subject to appropriate checks in a systematic manner? Yes No N/A
-
24. Does the laboratory follow written procedures to ensure that any computer software developed by the user is validated before use? Yes No N/A
-
25. Does the laboratory follow written policies and procedures to ensure that all equipment of and software used for testing, calibration, and sampling is uniquely identified, capable achieving the accuracy required, and, prior to being placed into service, complies with the specifications relevant to the tests and/or calibrations concerned? Yes No N/A
-

**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

26. Does the laboratory follow written procedures to ensure the proper tests and/or calibrations concerned, use and plan maintenance of all equipment, and ensure that any defective equipment, e.g., equipment outside specified limits, is removed from service and clearly labeled as "out of service"?

Yes No N/A

27. Are records for this equipment and software maintained and do they include at least the following:

- a) The identity and unique identification of the equipment and/or software? Yes No N/A
- b) User instructions (preferably manufacturer's instructions)? Yes No N/A
- c) Checks that the equipment complies with the required specifications? Yes No N/A
- d) Dates, results and copies of reports and certificates of all maintenance, calibrations, and adjustments, including any damage, malfunction, modification or repair to the equipment? Yes No N/A

28. Does the laboratory follow written policies and procedures for the calibration of its equipment and the use of reference standards and materials, and do they include at least the following:

- a) Calibrations performed prior to being placed in service? Yes No N/A
- b) Instructions for the safe handling, transport, storage and use of reference standards and reference materials in order to prevent contamination or deterioration and in order to protect their integrity? Yes No N/A
- c) Are certified reference cultures (CRC) traceable to a nationally or internationally recognized type culture collection, e.g., ATCC, or reference cultures (RC) from laboratory sources identified for key biochemical and physiological characteristic relative to standard reference sources used? (Microbiology) Yes No N/A
- d) Are these CRCs and RCs transferred no more than 5 times to maintain their biochemical reaction and physiological characteristic integrity before being replaced or re-identified for key biochemical and physiological characteristics using nationally or internationally recognized reference sources? (Microbiology) Yes No N/A
- e) Are reagents, standards, and reference materials in each method traceable? Yes No N/A

**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

29. For those laboratories responsible for sample collection:

- a) Does the laboratory follow written policies and procedures for sampling, based on appropriate statistical methods? Yes No N/A
- b) Are traceability records maintained for this sampling that include identification of the sample, identification of the sampler, the environmental conditions, and the identification of the sampling location (where necessary)? Yes No N/A
-

30. Regarding the receipt, handling, protection, storage, retention and/or disposal of samples, does the laboratory follow written procedures that include:

- a) Ensuring that samples and their associated records can be uniquely identified and traced throughout their lives in the laboratory? Yes No N/A
- b) Recording, upon receipt, sample acceptance or discard determination and, if applicable, abnormalities/departures from expected conditions? Yes No N/A
- c) Avoiding deterioration, loss or damage to the sample during storage, handling, and preparation? Yes No N/A
- d) Providing (where necessary) secure storage that protects the condition and integrity of the samples (or portions)? Yes No N/A
- e) Defined Sample Conditions (temp, storage/transit time, storage time on receipt) when trans-shipping to a contract laboratory for analysis completion, e.g., confirmation, serology/serotyping? Yes No N/A
-

31. Does the laboratory follow written quality control procedures monitoring the validity of all tests undertaken to include, but not limited to, the following:

- a) (If available) Regular use of certified reference materials, cultures, internal quality controls using secondary reference materials, and/or appropriate quality control strains accompanying the sample to confirmation, e.g., for *Salmonella* analysis using H₂S⁺ & H₂S⁻ *Salmonella* control strains? Yes No N/A
- b) Replicate tests using duplicates of the same sample? (Chemistry) Yes No N/A
- c) Confirmation testing by a cultural method when a screen method indicates a presumptive positive? (Microbiology) Yes No N/A

**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

32. Does the laboratory:

- a) Participate in inter-laboratory comparison or proficiency-testing (PT) programs where available or an intra-laboratory program? Yes No N/A

NOTE: PT samples must be analyzed in all laboratories that perform any portion of the test for the MPI program in the same manner as MPI establishment samples are analyzed. PT programs shall cover the entire method.

- b) Use quality control samples with each batch run? (Microbiology requires positive and sterility controls.) Yes No N/A
-

33. Does the laboratory follow written policies and procedures to ensure that the results of each test or series of tests carried out by the laboratory are reported accurately and in accordance with any specific instructions listed in the test method or as otherwise instructed? Yes No N/A

34. Do laboratory sample records contain at least the following, to ensure traceability:

- a) Unique identification of personnel preparing samples and performing tests? Yes No N/A

- b) The name of the laboratory, or other unique identification or description of where testing was carried out? Yes No N/A

- c) Identification of the method used for the testing, along with any deviations from or additions to the test method? Yes No N/A

- d) Any appropriate dates associated with the testing, e.g., sample receipt date, incubation time-in and time-out dates, testing date(s), etc.? Yes No N/A

- e) The name(s), title(s), and signature(s) (or other equivalent identification) of person(s) approving the release of test data for reporting? Yes No N/A

- f) In records containing the results of sampling, the date/location of the sampling and date results are reported as positive or negative? Yes No N/A
-

35. Does the laboratory test and record media productivity/sterility results, assign expiration dates and prohibit use of expired media, reagents and critical supplies on customer samples? Yes No N/A

36. Are expired media, reagents and critical supplies properly disposed of in a defined time frame? Yes No N/A

37. Does the laboratory have plans for ISO 17025 accreditation during the next year? Yes No N/A

**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

38. List each method the laboratory uses in support of the FSIS MPI Program including title, revision number/date, commodities described (for preparation, start up) and associated SOPs for information not included in the method itself. For any method/revision and SOP not previously submitted, include a copy in the submission package for review. Yes No N/A

MLG 4.10 Salmonella Isolation and Identification
MLG 4 Salmonella Flow Chart (Appendix 2 04)
MLG 4C.07 Salmonella BAX PCR
MLG 5.09 E coli O157:H7 Isolation and Identification
MLG 5C E coli O157:H7 Flow Chart
MLG 5A.04 E coli O157:H7 BAX PCR
MLG 5B.05 Non-O157 STEC Isolation and Identification (including BAX PCR)
MLG 5C Non-O157 STEC Flow Chart
MLG 8.11 Listeria Isolation and Identification
MLG 8A.06 Listeria BAX PCR

MLG appendix 1.09 Media and Reagents
MLG appendix 3.01 FSIS Laboratory Regulatory Sample Pathogen Methods Table and Definitions

Product Inserts:
3M Petrifilm Plate Count
BAX Salmonella
BAX E coli O157:H7
BAX STEC Screening, STEC Panel 1, STEC Panel 2
BAX Listeria monocytogenes
Hardy Diagnostics HardyCHROM™ Listeria Agar

**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

39. Have any additional analysts been trained since the last submission?

Yes No N/A

40. List by analysis, the names of all analysts trained to perform each scope method:

Kimberly Newman: E coli O157:H7, Non-O157 STEC, Salmonella, Listeria monocytogenes BAX and BAM Culture Testing and Reporting Results

Kathy Manion: E coli O157:H7, Non-O157 STEC, Salmonella, Listeria monocytogenes BAX and BAM Culture Testing and Reporting Results

Michelle Mozer: E coli O157:H7, Non-O157 STEC, Salmonella, Listeria monocytogenes BAX and BAM Culture Testing and Reporting Results

Katie Sides: E coli O157:H7, Non-O157 STEC, Salmonella, Listeria monocytogenes BAX and BAM Culture Testing and Reporting Results

Joanne Thun: E coli O157:H7, Non-O157 STEC, Salmonella, Listeria monocytogenes Sample Preparation

Jenna Kaiser: E coli O157:H7, Non-O157 STEC, Salmonella, Listeria monocytogenes Sample Preparation

41. List the proficiency test programs the laboratory participates in for each method/analyte including in-house prepared samples for analytes without external programs:

Wisconsin State Laboratory of Hygiene (WSLH) which is a commercial proficiency program received two times per year and includes enteric pathogens and shiga-toxin detection.

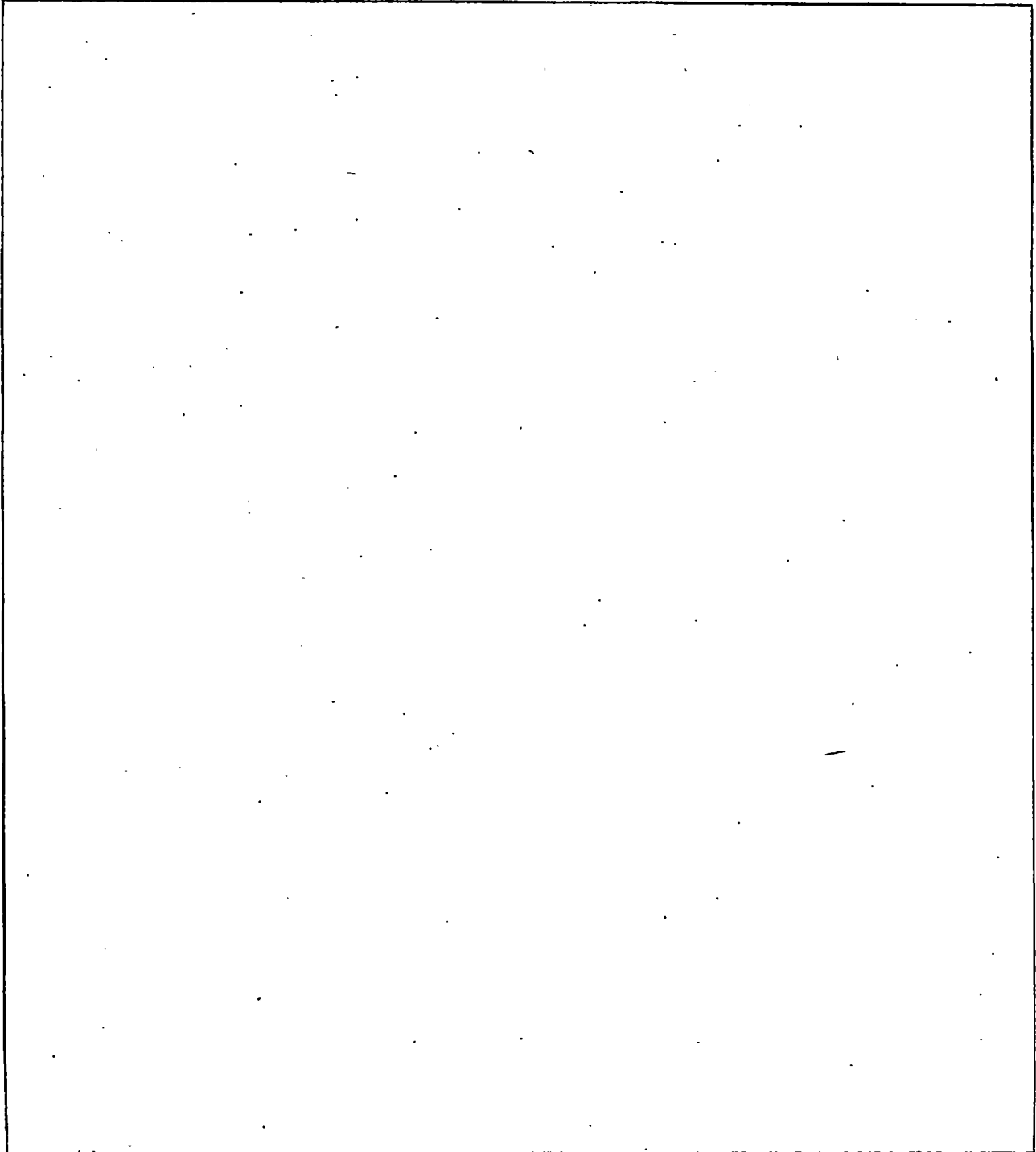
National Enteric Reference Laboratory (NERL) Quality Assurance Panel offered by the Centers for Disease Control and Prevention

Applicable proficiencies provided by the Food Response Network (FERN)

In-house blinded proficiency panels for designated enteric pathogens

**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

Comments: Attach additional page if needed.



**STATE MEAT AND POULTRY INSPECTION (MPI) PROGRAM
LABORATORY QUALITY MANAGEMENT SYSTEM CHECKLIST**

Instructions for Completing the Form

1. Enter the information requested. Answer all questions on the checklist by selecting the appropriate response for each question. Use page 9 for additional information and clarifications. Questions pertaining to services, equipment, instruments, methods or procedures not used routinely by the laboratory should be marked not applicable (N/A).
 2. The question requirements are related to the laboratory services in support of the State MPI Program only. These requirements do not apply to testing performed under other programs.
 3. Submit the completed form electronically to: Submit Checklist by E-mail
- * *When submitting the form please include the supported state name in the subject of the email.*

Hamel, Gary

From: Van Hook, Jessica - FSIS <jessica.vanhook@usda.gov>
Sent: Friday, September 24, 2021 2:09 PM
To: Hamel, Gary
Cc: Reeder, Robert - FSIS; Van Hook, Jessica - FSIS; Monteverde, Jenifer - FSIS; James, David - FSIS
Subject: [EXTERNAL] Montana State CIS Program Review

Director Hamel,

Good afternoon; FSIS is reviewing your request to start a Cooperative Interstate Shipping program and wanted to provide initial feedback to you regarding microbial sampling and laboratory accreditation. Our Office of Public Health Science (OPHS) team has provided the following feedback:

- As FSIS CIS eligibility subject matter experts continue to evaluate the Montana request and “same as” eligibility criteria support, we wanted to let you know that the Office of Public Health Science (OPHS) laboratory experts have identified the 9/16/2021 Montana provided statement on page 4, “Laboratory Services” and “Laboratory Methods” does not satisfy the criteria for “same as”.
 - Montana states, “(Montana Public Health Laboratory) lab is not ISO 17025 accredited and has no plans to actively seek this accreditation in the next to years. If FSIS will not accept this laboratory’s methods and service requirements as previously accepted for Montana’s “equal’ status..., another laboratory will be located and an agreement made....for product sample before CIS program is approved.”
- OPHS has identified to satisfy the “same as” requirements, Montana will need to provide support they have identified and contracted the laboratory which they will utilize for State MPI microbial analysis of CIS inspected product samples. OPHS stated FSIS already provides the food chemistry services for Montana and no further support is required for chemical methods or analyses.
- We can facilitate meetings and contact with OPHS experts to support Montana in meeting these laboratory criteria. If there is any interest in such a meeting, Montana can make a request through Deputy District Manager Dr. Jessica VanHook. Dr. VanHook can be reached at Jessica.VanHook@usda.gov.
- Montana’s request did identify the alternative plan to seek out another accredited laboratory and we wanted to give you the opportunity to start working toward that alternative while we continue to verify the entire “same as” program requirements. We will continue to review the other eligibility criteria and provide a more comprehensive update.

If you have any questions, please feel free to reach out to me.

Regards,

Dr. Jessica L. VanHook, DVM MPH

she/her/hers

Deputy District Manager

Office of Field Operations, Denver District

Food Safety and Inspection Service, USDA

1 Denver Federal Center

Building 45, Door S-3

Denver, CO 80225

Office: (303) 236-9804

Cell: (712) 202-4221

Jessica.VanHook@usda.gov

Hamel, Gary

From: Reeder, Robert - FSIS <robert.reeder@usda.gov>
Sent: Wednesday, October 20, 2021 8:07 AM
To: Hamel, Gary
Cc: Pasko, Amber - FSIS; Van Hook, Jessica - FSIS; Monteverde, Jenifer - FSIS; James, David - FSIS; Legg428, Jeffrey - FSIS
Subject: [EXTERNAL] RE: email check

Director Hamel,

I am pleased to let you know that the CIS subject matter expert review committee has completed the review of the Montana written request to participate in the CIS Program and supplemental support materials provided on September 16. The committee experts have determined that "same as" eligibility criteria *other than* the microbial laboratory methods and analyses as previously shared with Montana on September 24, 2021, are satisfied.

Pending items and/or comments at this point:

- FSIS is awaiting the microbial support from Montana to continue the review and the September 16, 2021, request.
- Also please be aware that the food inspector course must be completed in the first year the inspector is assigned to provide CIS inspection. For planning purposes, this course is now virtually delivered by the FSIS OEED Training and Management Branch, once or twice per month.

Thanks,

Dr. Robert Reeder Jr.
District Manager
Office of Field Operations, Denver District
FSIS/USDA
P.O. Box 25387, Bldg. 45
Denver, CO 80225-0387
(303) 236 9788 Office
(303) 236 9794 fax
(509) 994 4201 mobile
Robert.Reeder@usda.gov

From: Hamel, Gary <ghamel@mt.gov>
Sent: Thursday, September 16, 2021 5:44 PM
To: Reeder, Robert - FSIS <robert.reeder@usda.gov>
Subject: Re: email check

Mr. Reeder,

My email address is ghamel@mt.gov. I look forward to hearing from you.

Gary Hamel, State Director
Montana Meat and Poultry Inspection

From: Reeder, Robert - FSIS <robert.reeder@usda.gov>
Sent: Thursday, September 16, 2021 5:11 PM
To: LIV Email; Hamel, Gary
Cc: Van Hook, Jessica - FSIS
Subject: [EXTERNAL] FW: email check

Hello,
I'm looking to confirm State Director Gary Hamel's email to send an acknowledgment letter.

Best,

Dr. Robert Reeder Jr.
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Office of Field Operations, Denver District
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P.O. Box 25387, Bldg. 45
Denver, CO 80225-0387
(303) 236 9788 Office
(303) 236 9794 fax
(509) 994 4201 mobile
Robert.Reeder@usda.gov

From: Reeder, Robert - FSIS
Sent: Wednesday, September 15, 2021 12:59 PM
To: Hamel, Gary - FSIS <Gary.Hamel@usda.gov>
Subject: email check

Mr. Hamel,
I'm just checking to see if this email address is still current. I received a Cooperative Interstate Shipment program letter today and need to acknowledge receipt.

Thanks,

Dr. Robert Reeder Jr.
District Manager
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SOUTH DAKOTA STATE UNIVERSITY

Veterinary and Biomedical Sciences Department
SD Animal Disease Research and Diagnostic Laboratory

DATE: 1/10/2022

To: Gary Hamel, Bureau Chief
Montana Livestock Inspection Program

The Food Safety Microbiology laboratory at the SDSU ADRDL is willing and able to test Environmental/Food Contact swabs, RTE Meats, Ground Beef, and Beef Trim collected by the Montana Meat Inspection Program as part of the Cooperative Interstate Shipment Program. Testing will be performed as fee for service.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Ruesch'.

Laura Ruesch
Research Associate III

Hamel, Gary

From: Pasko, Amber - FSIS <amber.pasko@usda.gov>
Sent: Monday, January 24, 2022 10:37 AM
To: Hamel, Gary; Reeder, Robert - FSIS
Cc: Van Hook, Jessica - FSIS; Monteverde, Jenifer - FSIS; James, David - FSIS; Legg428, Jeffrey - FSIS
Subject: [EXTERNAL] RE: email check

Mr. Hamel,

I apologize for not responding to you sooner. I did verify with our CIS laboratory experts the use of the South Dakota laboratory is acceptable for "same as" microbial methods for livestock species. I.e., "same as" support for meat but not poultry. OIEA FSAB identified Montana has a deadline at the end of the month to submit documentation requested following the July 2021 "at least equal to" audit. Because CIS participation is dependent on an "at least equal to" status, OFO was pending these materials before we circulate a DRAFT, pre-decisional "same as" CIS Agreement for FMIA amenable products for review in FSIS and signature.

- Has Montana submitted the requested documentation to OIEA in regard to the 2021 "at least equal to" audit? I had planned to follow up with OIEA this week for an update on the materials requested.

Please let me know if you have other questions or concerns.

Thank you,
amber

Amber Pasko DVM, MPH, DACVPM
Veterinary Medical Officer
Recall Management and Technical Analysis Division
Office of Field Operations
Food Safety and Inspection Service, USDA
Phone: (202) 754-0508

From: Hamel, Gary <ghamel@mt.gov>
Sent: Monday, January 24, 2022 11:57 AM
To: Reeder, Robert - FSIS <robert.reeder@usda.gov>
Cc: Pasko, Amber - FSIS <amber.pasko@usda.gov>; Van Hook, Jessica - FSIS <jessica.vanhook@usda.gov>; Monteverde, Jenifer - FSIS <jenifer.monteverde@usda.gov>; James, David - FSIS <david.james@usda.gov>; Legg428, Jeffrey - FSIS <jeffrey.legg428@usda.gov>
Subject: RE: email check

Mr. Reeder,

I have not received a response regarding the letter I sent you solidifying our relationship with the SD State University lab for testing under the CIS program. Can you please advise me of next steps? Thank you,

Gary Hamel, State Director
Montana Meat and Poultry Inspection

From: Reeder, Robert - FSIS <robert.reeder@usda.gov>

Sent: Wednesday, October 20, 2021 8:07 AM

To: Hamel, Gary <gghamel@mt.gov>

Cc: Pasko, Amber - FSIS <amber.pasko@usda.gov>; Van Hook, Jessica - FSIS <jessica.vanhook@usda.gov>; Monteverde, Jenifer - FSIS <jenifer.monteverde@usda.gov>; James, David - FSIS <david.james@usda.gov>; Legg428, Jeffrey - FSIS <jeffrey.legg428@usda.gov>

Subject: [EXTERNAL] RE: email check

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- Also please be aware that the food inspector course must be completed in the first year the inspector is assigned to provide CIS inspection. For planning purposes, this course is now virtually delivered by the FSIS OEED Training and Management Branch, once or twice per month.

Thanks,

Dr. Robert Reeder Jr.

District Manager

Office of Field Operations, Denver District

FSIS/USDA

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Robert.Reeder@usda.gov

From: Hamel, Gary <gghamel@mt.gov>

Sent: Thursday, September 16, 2021 5:44 PM

To: Reeder, Robert - FSIS <robert.reeder@usda.gov>

Subject: Re: email check

Mr. Reeder,

My email address is gghamel@mt.gov. I look forward to hearing from you.

Gary Hamel, State Director

Montana Meat and Poultry Inspection

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Cc: Van Hook, Jessica - FSIS
Subject: [EXTERNAL] FW: email check

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Robert.Reeder@usda.gov

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To: Hamel, Gary - FSIS <Gary.Hamel@usda.gov>
Subject: email check

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Office of Field Operations, Denver District
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