



Meat Processing for Inmates

*Considerations for Creating a Butcher Training Program at the
Northeastern Regional Corrections Center*



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Executive Summary

The Northeastern Regional Corrections Center (NERCC) is a minimum security prison near Saginaw, Minnesota where inmates perform daily work responsibilities as a part of their rehabilitation activities. Some of these activities involve agricultural work such as taking care of animals, growing, planting and harvesting produce and processing meat and poultry products to be used in the NERCC commissaries. Informal training and education in meat slaughter and processing is already occurring as a part of these activities. The intent of this project would be to create a formal educational opportunity for inmates to receive focused vocational training, fill employment needs in the meat processing sector and create more opportunities for local farmers to have animals slaughtered and processed under continuous inspection so that they can market these products locally. This report documents that many of the pieces for this program are in place; however, several logistical issues remain, such as the length of stay for inmates and available training time during that stay. These issues need to be addressed with the pilot program to ensure that the educational efforts fit within the confines of the NERCC system and meet the needs of NERCC inmates, farmers and meat processors.

Introduction

During the 2015 legislative session, funds were allocated to study and provide recommendations for upgrading the existing processing facility located on the campus of the NERCC into a USDA certified-food processing facility. This money was allocated in conjunction with funding used to support a correctional facility vocational training pilot program, which would be intended to be implemented as the new facility becomes available for use. This report is intended to provide detailed information on some of the considerations and challenges involved in successfully implementing and maintaining this program at the NERCC. The report will review current resources and financial considerations, employment and job market issues, inspection and food safety details, as well as discuss the planned next steps for this project and initial recommendations for future resource expectations.

Background

The NERCC is located in rural Saginaw, Minnesota. This correctional institution is a part of Arrowhead Regional Corrections which provides correctional services to five counties in northeastern Minnesota: Carlton, Cook, Lake, Koochiching, and St. Louis. The NERCC is a 144 bed minimum security level institution that houses adult males with offense categories such as violations of probation, DWI and other alcohol-related offenses, assault, drug offenses, burglary, and criminal sexual offenses. While at NERCC, offenders may participate in educational programs, vocational training, treatment, recreation and receive medical services (Arrowhead Regional Corrections, 2016).

As a part of their rehabilitation model, the NERCC operates in a manner that requires offenders to participate in assigned work activities. Many of these functions are day-to-day work activities necessary for feeding and housing offenders, such as cooking in the kitchen, maintaining grounds, taking care of animals, etc. As a part of this effort, the NERCC also operates a licensed and permitted food and meat processing facility.

This facility is a custom exempt meat processing facility which serves area farmers by processing animals and returning them to their owners. They have also operated with a Minnesota "Equal To" Slaughter and Processing Grant of Inspection since 2001, which allows them to slaughter and process animals for sale. The NERCC uses meat and poultry processed at the slaughter plant in their own commissaries, as well as on occasion, has distributed products to other commissaries within the

Arrowhead Regional Correction system. On a limited basis, NERCC has also slaughtered and processed poultry for private individuals or area farmers for wholesale purposes when inspection was required. The NERCC also processes vegetables and other foods for internal use in their commissary.

In the slaughter and processing plant, offenders participate in general work activities, including conducting the slaughter and processing activities necessary to harvest the animals. By virtue of participation, offenders learn the steps necessary to butcher an animal and process the cuts of meat that come from that animal. While no official training is documented, offenders become trained in some of the skills necessary to work in a slaughter plant through their participation in these activities. Anecdotally, people who have gone through the NERCC program have noted that their experience in meat cutting has been helpful to finding work in this field. (Jenna Ross, Star Tribune, 2015)

This project brings together a potential solution to three main needs identified in discussion with meat processors, farmers and the NERCC program staff:

- The need to update the current facility at the NERCC as it is aged, and in relatively poor physical condition. To some extent, the slaughter and processing capacity at the NERCC has been limited by the current resources and wear of their current facility, as well as the logistics around providing consistent labor for the slaughter facility.
- The need for additional slaughter and processing capacity in northeastern Minnesota. Expansion of services at area meat processing plants like NERCC could provide more convenient and efficient opportunities for local farmers, helping them to bring products to farmers markets, local grocery stores, and other outlets.
- The need for a training program in meat and poultry slaughter, as well as processing in Minnesota. No programs currently exist in Minnesota or in any nearby Midwest State.

The main goal of the this project is to meet these needs by providing inmates with vocational training that they can use to obtain viable employment after their release, enabling NERCC to expand their services in a way that is beneficial to area farmers, and by helping continue to ensure the NERCC can meet food safety and facility requirements that are necessary to continue their model of providing food and meat to inmates and a service to the public.

Definitions

Custom Exempt Meat Processor: A processor that does not require continuous inspection because they only process meat for the owner of the animal. The meat or poultry cannot be sold and can only be consumed by the following:

- The owner of the animal
- The owner's immediate family
- Non-paying guests

Custom processed meat and poultry must be labeled with "NOT FOR SALE". Animals that are slaughtered are slaughtered without an inspector present. Meat establishments that are under custom exempt inspection are inspected 1-4 times per year to ensure they meet sanitation and facility requirements.

Minnesota 'Equal To' Processor: A meat and/or poultry processor that has continuous inspection services provided by the Minnesota Department of Agriculture. The requirements for this inspection program are 'Equal To' or the same as those required by the United States Department of Agriculture Food Safety Inspection Service (USDA FSIS) for meat that is sold. Meat or poultry products produced under 'Equal To' inspection can only be sold in Minnesota and not across State lines. 'Equal To' or USDA inspection is required for meat and/or poultry to be sold. These processors maintain food safety

systems, that include hazard analysis, process and sanitation controls. Every animal that is slaughtered must be inspected by an inspector to ensure it is safe and wholesome.

USDA Inspection: The Federal inspection program that inspects meat and poultry products that will be sold. These processors maintain food safety systems, that include hazard analysis, process and sanitation controls. Every animal that is slaughtered must be inspected by an inspector to ensure it is safe and wholesome. Meat and poultry products produced under USDA Inspection may be sold interstate and internationally through export.

Training Program Considerations

The purpose of the pilot program would be to create a training program for inmates and the NERCC. During their time at the NERCC, inmates would be assigned to work in the slaughter and processing operations. They would gain experience and training in basic meat cutting techniques, including slaughter and processing. In addition, the inmates could be introduced to basic food safety concepts and the recordkeeping requirements needed as a part of the overall work responsibility.

Type of Training

Training for meat cutting and meat science fields is typically categorized into one of three categories:

- Certificate training course/technical education
- Undergraduate training in meat science
- Graduate level meat science degree

Given that potential program participants have varying levels of education and spend a varying amount of time at NERCC, which is often 90 days or less, pursuing some kind of certificate program is likely the only feasible option for this program. The certificate program can be tailored to the kind of work performed at the NERCC and the kinds of job opportunities expected to be available to those who complete the program. While this program would be non-accredited, the most important component is to ensure that program participants have something to show potential employers to verify that they did indeed receive training and what kind of training was received.

Availability of Training Programs

For people who desire basic training in meat cutting and butcher techniques and skills, training opportunities are extremely limited. In Minnesota, there are no formal training programs that currently exist. In a cursory search for meat processing technical or certificate educational programs, approximately ten programs were located across the country. These programs varied in size, scope, length of training, and level of accreditation. There is not an accreditation entity for meat processing training; however, some programs meet State or Association-certified or accredited programs.

The existing programs are widely varied in their length and scope. A good example of a more recently created program is the Hannaford Career Center of Vermont, which offers a Skilled Meat Cutters and Butchers Academy. This is a comprehensive adult education course in meat cutting which spans a 2 year time period (Hannaford Career Center, 2016), with courses offered intermittently. This course is set up for adult learners and offers weeklong courses in various topics such as wholesale meat processing and fabrication, Hazard Analysis Critical Control Points (HACCP), poultry processing, retail meats, and other related areas. While the course length at the Vermont Academy would not be feasible for the NERCC course, the span of topics and learning could be similar given the current span of the NERCC activities.

Expected Challenges

On the surface, the training program proposal seems to be a logical fit, given that some inmates, by the nature of their daily responsibilities, are already learning the skills necessary to work in a meat processing plant. In discussions with the NERCC staff, several items of concern were raised:

- Length of stay: The current length of stay at the NERCC facility is usually 90 days or less, and is highly variable based on the offenders offence and sentence. The variability may be difficult to accommodate in a more formal training program, especially in terms of ensuring participants receive enough repetitions to meet a training standard. Offenders may need to be assessed as they enter NERCC to determine if they meet the criteria for the training program.
- Training time: While at the NERCC, offenders participate in work assignments as well as other training and treatment programs. Often, other training and treatment programs interfere with work assignments and may shorten and interrupt work assignments. For example, sometime slaughter activities will need to cease because a worker must leave to report to another activity, which leaves the slaughter operation shorthanded and either unable to function or slowing work considerably. Consistency of workforce is currently a significant problem for the NERCC plant in terms of availability of inmates for a defined amount of time, which makes training, even for basic day-to-day tasks a challenge.
- Desirability of training for offenders: Work in a meat slaughter and processing plant is difficult work. These jobs are bloody, dirty, and often physically demanding. Offenders come to the NERCC from a variety of backgrounds and it is likely that few come with previous experience in agriculture or similar type of work backgrounds. It is generally unknown whether offenders would willingly participate in a more formal training program, even if it is offered. In the next few months, the MDA and the NERCC staff plan to conduct a more formal survey of offenders entering the NERCC to gather more information on how offenders feel about participating in this training program.
- Slaughter and Processing Workload: Currently, the NERCC operation has relatively low slaughter numbers, even for a smaller sized plant. Also, their slaughter load is fairly seasonal which might limit the amount of work available during some times of the year. For any training program, especially an experiential program like that being proposed, adequate repetition is required to ensure participants receive enough hands-on experience to be confident in their skills. Also, it is important that participants receive a diverse experience so that their skills are marketable in a variety of different kinds of meat processing facilities, from slaughter plants to grocery store meat counters. It is likely that the NERCC would need to expand their operation to ensure participants received the necessary experience.

The MDA and the NERCC staff continue to work on addressing the issues identified above, as this will be critical to the success of a training program and its participants. It is anticipated that training time may be able to be adjusted for those inmates participating in this program; however, the length of stays at the NERCC are dictated by judges and the legal system rather than NERCC staff. More coordination would be needed with the judicial system to make this more feasible. Expansion of the NERCC services may also be possible and is discussed more in the Processing Capacity Section of this report.

Employment and Work Opportunities for Potential Program Graduates

With any training program, it is important that graduates of that program have opportunities to find relevant and viable work after their participation is completed. Many factors should be considered, such as the demand for employees in that particular field, the strength of the overall job market and potential salaries for graduates. Of particular concern for this study, program participants would graduate with training, but also would have a criminal record of some kind and in many cases, may be

on probation for a period of time after they leave the NERCC. If meat processors would be unwilling to hire program graduates, then the establishment of a training program at the NERCC may not be an effective way to address employment shortages within the meat industry. To answer this question as well as others, the Minnesota Department of Agriculture sent surveys to approximately 200 Minnesota meat processors including: custom & retail exempt, MN State Equal-To, and USDA inspected facilities. Thirty-eight responses were received and compiled. The complete results of this survey are included in Appendix 2.

Job Market and Employer Needs

As of May 2014, Minnesota is the second largest employer of slaughterers and meat packers in the United States. Roughly 2.86 jobs per 1000 jobs are considered to be part of the animal slaughtering and processing industry (U. S. Bureau of Labor Services, 2014). Much of this employment is likely attributed to larger processors in the State, especially within the poultry and pork industries. These plants are primarily located in southern and western Minnesota; none of these larger plants are located in the northeastern part of Minnesota. Offenders would likely need to relocate to work at these plants, which is often difficult due to probation constraints, as well as the need for local support resources as the offender reintegrates into the community. At least initially, most offenders from the NERCC program would need to find work at local, small butcher plants, and/or retail meat stores in northeastern Minnesota.

During informal discussions with owners and managers of very small establishments across Minnesota, it has been noted that they also have a strong need for employees, and that employees with any previous experience are very difficult to find. To collect more information about employer needs, the MDA survey included questions addressing employer needs and availability of potential employees. From the survey data, which included some plants and stores from Northeastern Minnesota:

1. About 63% of respondents stated that it is either “moderately or very” difficult to hire entry-level personnel at their establishment;
2. About 92% responded that “never or sometimes but not very skilled” in response to a question about whether they had applicants with experience; and
3. About 69% of respondents listed the skills of cutting, wrapping and packaging as the most important for prospective employees.

Overall, most respondents confirmed that it is difficult to hire entry level personnel and that they don't often get applicants with previous experience. This appears to indicate that the establishment of a training program for butchers and meat cutters could fill a gap that currently exists; meat processors need personnel, but are unable to find them currently, especially with previous training.

Potential Compensation

To gain an understanding of what the entry level pay for meat processing employees may be if they complete a training program, the survey also requested information on potential salaries for meat processing employees. Per the survey results, entry level salaries were listed with a range of \$8-\$13 per hour by over 86% of respondents. Over 72% of respondents indicated that they would pay between \$11-17 per hour for an employee with previous experience.

Meat processing can be a very seasonal business and availability of work can depend upon many factors, including the types of products or livestock processed at the plant, the types of products sold by the plant, whether or not they have a retail and/or venison operation, and other operational specifics. For example, in Minnesota most very small poultry processors only operate in the summer months and typically are challenged to offer full-time employment year round. As a result, most of their positions are not year-round fulltime and may even be seasonally part-time. Larger plants with more constant demand and production would be more likely to be able to offer full-time employment. Despite these challenges, over 54% of respondents in the survey said they would be able to offer full time

employment and another 40% said that they would be able to offer part-time or seasonal full time with part-time the remainder of the year.

While overall compensation may be low, program graduates would receive training without a financial investment of their own. As a result, they could graduate the program without student loans or debt incurred as a result of their education, which may increase the desirability of these jobs, especially if program graduates fall into the higher salary range listed for employees with previous meat processing experience.

Desirability of Graduates

Because the proposed program would train inmates/offenders, a major concern is the overall desirability of the program graduates to meat processors as potential employees. Program graduates would have a known criminal record and potentially be on probation, and the question of whether or not meat processors would be willing to hire program graduates is a valid concern.

The MDA survey asked processors directly whether or not they would be willing to hire an offender from the NERCC program. The survey results showed that most meat processors were willing to hire graduates. Specifically, about 89% of respondents answered “maybe, probably, or yes” when asked if they would hire an offender from the NERCC program (Figure 1).

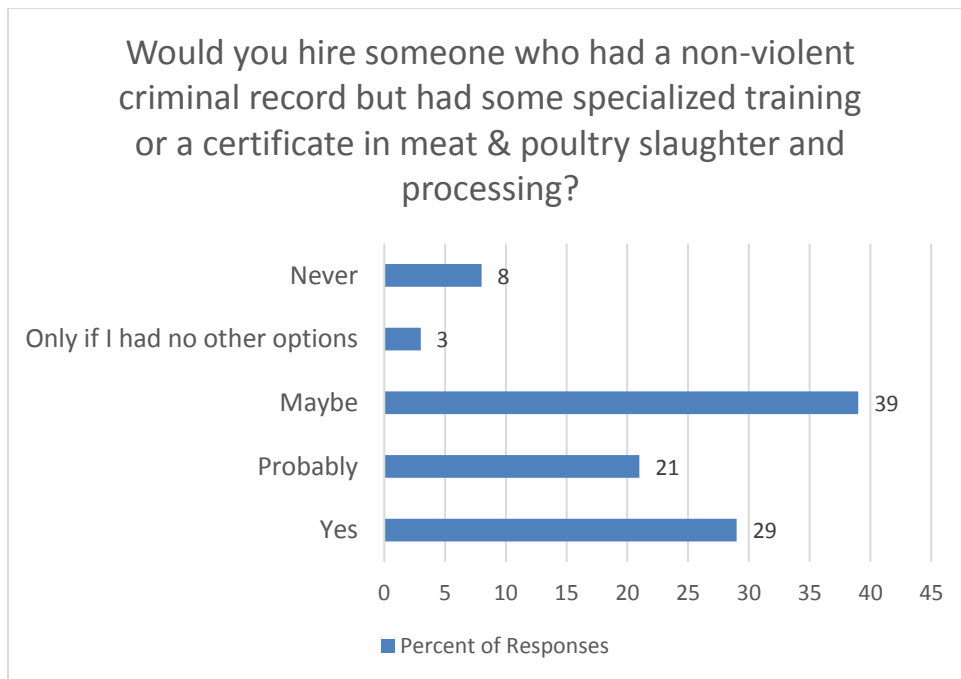


Figure 1. Results of Survey Question about Willingness to Hire

Of note, this survey question asked whether they would be willing to hire a non-violent offender; some offenders at the NERCC are classified as violent offenders. In verbal discussions with meat processors, some indicated that they may not be willing to hire a violent offender. However, meat processors overall appear to be willing to consider hiring offenders. Given the nature of the written comments (Question 12), the ‘who’ they would hire is likely to vary considerably by individual operator. In general, the industry appears to have difficulty finding personnel to work in their facilities, which would support an effort to train people for these kinds of positions, even if it involves training inmates.

Resource and Financial Feasibility

Technical Facility Requirements

Current Facility

The main slaughterhouse facility at the NERCC was built in 1967. In 1975, the entry addition was built. Following a fire, the interior and entire roof were rebuilt in 1984. As the main structure of the facility is nearly 50 years old, the facility is showing wear and is in need of significant updates to the floors, walls, and ceilings in order to meet sanitary requirements for safe food and meat production. The NERCC slaughterhouse building is used for meat and poultry slaughter and processing, as well as for their vegetable/produce operations, which occur in a mostly separate area. However, there are cross-utilized areas where the slaughter/processing is not completely separated from the produce processing areas. These areas are of significant concern because raw meat and poultry, which need to be cooked prior to consumption, inherently carry pathogens which can be of critical concern in raw vegetables, which are frequently consumed without prior cooking. If cross contamination occurs between the two operations, a significant issue with foodborne pathogens traditionally sourced to meat and poultry could occur on the produce side. Providing a better means of complete separation of these two operations is very important and necessary for producing safe food from this facility.

The current slaughterhouse facility has livestock holding pens outside the northeast side of the building which house the animals on a short term basis (typically the day of slaughter) until they are brought into the slaughter room for stunning and further processing. Birds are shipped from the NERCC poultry barn to the slaughterhouse using bird crates and then transported directly into the docking area connected to the slaughter room on the east side of the building. The doors and grounds about the facility are weathered and in need of repairs or updates. Temporary patching is in place to prevent vermin entry, but a permanent solution is needed to provide adequate animal handling facilities, especially if operations at this plant were to expand.

The interior of the plant has several processing rooms for red meat and poultry processing. The slaughter room connects to the holding pens, walk in cooler, and cutting/processing room. The walk-in cooler is equipped with a rail system for hanging carcasses and additional space for storing other products. There is not currently an adequate space to separate produce from raw meats, or raw products from cooked/smoked products as they all share the same cooler space, which is also limited by its size. Separate coolers for raw and finished/ready-to-eat products is highly recommended (and typically required for State "Equal To" Inspection or USDA Inspection) for food safety reasons in order to limit the potential for cross contamination.

The cutting/processing room connects to both the freezer and cooler, as well as the smoking room and slaughter room. This room is where the bulk of their meat processing equipment is stored and where meats are cut, ground, further processed, and packaged. Certain meat products including hams and bacons are cured and then smoked in the adjoining smokehouse room. The facility has a more traditional style gravity smokehouse which requires manual operation and does not automatically track product or smokehouse temperatures during the smoking process; therefore, it takes more time for the monitoring and recording of cooked temperatures, which are required for all types of operation. More modern style automatic smokehouses typically include microprocessors that have the ability to run smokehouse cooking and showering cycles, while controlling humidity and heat inside the oven chamber and simultaneously recording internal product temperatures with a data logging system or exterior temperature charting. These types of modern systems cost significantly more than traditional block or gravity smokehouses, but often are preferred due to the labor savings and consistency in the finished product.

The cooler and processing rooms, along with their floor/wall junctures have concrete floors that are showing some wear and will need resurfacing or replacement in order to be maintained in a smooth, cleanable condition over time. The cleaning and sanitation of these areas takes more time due to the

uneven floor surfaces that trap water and moisture. The walls are showing wear where holes or cracks are visible and where the glass board (FRP) is no longer secured properly. The NERCC has temporarily patched these areas but will need a long term solution for repair or replacement. Much of the equipment used in the processing areas is showing wear, making the cleaning and sanitation more difficult.

The freezer room is larger and is used for sharp freezing of custom product that is returned to the owner of the product after slaughter/processing at the NERCC. It is also used for extended storage of the NERCC meat and poultry products that may not fit adequately in the commissary freezer/cooler units. This freezer is no longer sealed properly and has an inadequate ventilation system. While it still is able to hold adequate cold holding temperatures, frost and ice tend to buildup in certain areas of the freezer room where air movement is limited and where condensation builds up. Due to the design and age of the freezer, they are currently removing ice/frost on an as needed basis until a new freezer can be installed.

The current facility limits the holding and storage capacity for NERCC as the cooler and freezer space is limited. The NERCC operates to work around their capacity limitations by scheduling slaughter strategically to ensure they have adequate space for carcass storage until further processing. If a training program were to be implemented, they would be challenged to expand business and take on more work without a new facility.

The New Facility

The management at the NERCC is aware of the facility condition at the slaughterhouse and has been working with MDA Inspection Program personnel on temporary solutions with the intent that they were moving forward with plans to build a new slaughterhouse and produce processing facility adjacent to the current building. In the 2015 legislative session, they received approximately 1.2 million thru an Appropriations General Obligations Bond as an operating budget for the construction of a new facility. The NERCC is working with Scalzo Architects out of Duluth, MN to design and construct the new plant. Draft floor plans are in the review process now and documentation is expected to be issued for bidding by mid-March. A copy of the plan dated January 28, 2016 is included in Appendix 1. The bidding process in St. Louis County should take approximately one month, then will proceed into the construction document phase for a planned spring construction.

MDA staff are working with the NERCC officials and Scalzo Architects on the review of these plans to ensure statutory requirements are met for both Minnesota "Equal To" Inspection and USDA Inspection and that the new facility has an optimal design for the flow of production from slaughter to raw and cooked processes. The plans will also allow for future expansion. MDA staff also arranged for the architects and relevant NERCC staff to meet with and tour a new USDA meat plant that recently began operations in the area to provide additional ideas on how to design a meat facility.

At this time, a meeting/training room is not included in the work plans. It was recommended to include an onsite training/meeting room within the building as it would be necessary for certain aspects of the training program, as well as when inspection staff need to meet with NERCC staff for discussion of issues relating to the training program or inspection. However, NERCC staff feel that there is adequate space within their school building or main building to meet these training needs and training could occur in one of these alternate locations.

The current slaughterhouse is approximately 4,000 square feet, which includes the basement storage areas that are not fully utilized due to location and access. The planned facility would be at least 5,100 square feet and all on one level for easier access and designed to maximize process flow through the plant. Considerations for future expansion have also been included. In preparations for the new facility, the NERCC added a new well in July of 2015 and a new septic system that services the slaughterhouse was installed in 2010. Both will ensure the slaughterhouse expansion and new building meets current State and County requirements.

Once the facility is completed, the NERCC will need to purchase new and improved equipment for both their slaughterhouse and produce operations. They are working on obtaining funding for this, and MDA staff members have worked to identify potential grant opportunities, such as the MDA Value Added Grant Program, which offers grants for equipment purchases or physical improvements for food and meat processors. However, this program requires the applicant to bring matching funds for the project, which are currently not available for the NERCC. Without a source for additional funding, plans for new equipment outside their current building budget are limited.

The new facility is designed to address the shortcomings of the current facility as well as to provide adequate space and opportunity for oversight of offenders and staff. For example, the new facility provides for adequate separation by spatial arrangement, as well as the incorporation of doors and lavatories in between the meat production areas and the produce production area to ensure better sanitation and hygiene. Also, the proposed facility plans include window viewing in multiple areas of the building, which would allow NERCC Management to observe the work being conducted in multiple areas at the same time which is a challenge at the current facility. The addition of these viewing windows allows current supervisory staff, as well as inspection personnel, to ensure offenders that are conducting the slaughter and processing operations are staying on task and following requirements. The addition of windows/viewing panes throughout the facility is also important for teaching. Offenders or other NERCC management can observe operations and learn about the production process without interrupting the process where time and resources are limited.

The plans also include an office space with a lock file for inspection personnel, which is required for Minnesota "Equal To" and USDA Inspection. If the vocational training program is successful, an additional office space would be recommended for the Onsite Program Coordinator in order to provide adequate space for privacy for the organizational and coordination duties that would be required of this position.

Food Safety Requirements

Meat processing facilities must meet certain regulatory requirements for food safety. In the State of Minnesota, Custom Exempt meat and poultry slaughter and processing facilities, as well as Inspected facilities under the State 'Equal-To' Meat and Poultry Program, must be licensed and inspected by the MDA. "Equal To" plants undergo inspection that is considered 'Equal To' USDA Food Safety Inspection Service Inspection, which allows the facility to wholesale meat products within the State of Minnesota. USDA Inspection is required for plants that wish to wholesale products across State lines. Currently, NERCC conducts both custom exempt and State Equal-To operations.

As a licensed and inspected facility, NERCC must meet and maintain the minimum requirements as set forth in Title 9 CFR Part 416, which covers the Sanitation Performance Standards (SPS). SPS regulations cover the following areas:

- §416.1 General Rules: prevent the creation of insanitary conditions and to ensure that product is not adulterated.
- §416.2 (a) Grounds and Pest Control
- §416.2 (b) Construction
- §416.2 (c) Lighting
- §416.2 (d) Ventilation
- §416.2 (e) Plumbing
- §416.2 (f) Sewage Disposal
- §416.2 (g) Water Supply
- §416.2 (h) Dressing rooms, Lavatories, and Toilets
- §416.3 Equipment and Utensils: Construction, Storage, Cleaning/Sanitizing, and Inedible Handling

- §416.4 Sanitary Operations: Food Contact and Non-Food Contact Surface Sanitation, Cleaning Chemicals Safety in Use, and Protection of Product within the establishment
- §416.5 Employee Hygiene: Cleanliness, Clothing, and Disease Control.

While these regulatory requirements are standards and not prescriptive in nature, they provide general expectations for sanitary conditions to provide a safe environment for the production of safe meat and poultry products for the consumer. Whether a facility is custom exempt or inspected under the continuous 'Equal-To' or USDA Program, they must meet all the requirements under 9 CFR 416.1-416.5, which would be verified during routine inspections.

Since NERCC is also a State 'Equal-To' Inspected establishment, they must meet additional regulatory requirements regarding sanitation as set forth in 9 CFR 416.11-416.16. These regulations outline specific requirements regarding written Sanitation Standard Operating Procedures (SSOPs), SSOP Records, Implementation and Maintenance of the SSOP, as well as Corrective Actions when the SSOP may have failed to prevent product contamination. The recordkeeping regulations require NERCC to maintain daily records documenting the implementation and monitoring of their SSOPs and any corrective actions taken. By conducting these ongoing activities and maintaining records, the firm takes an active role in ensuring they are meeting regulatory requirements and producing safe products. Inspection personnel also play an important role by verifying that the Sanitation regulatory requirements are being maintained and taking appropriate actions when they find violations.

NERCC must also meet regulatory requirements for their food safety systems called Hazard Analysis and Critical Control Points (HACCP) Plans. The HACCP System is intended to provide a regulatory framework for food safety surrounding the production of meat and poultry products through the identification and control of hazards that are likely in the production process. They accomplish this through detailed food safety procedures where critical control points are identified for steps in the production process where likely food safety hazards can be controlled, reduced, or eliminated. These critical control points must be designed to ensure applicable targets or performance standards established with a scientific purpose to control the specific hazard that is identified. NERCC must implement monitoring procedures at these steps to ensure these controls are met, verify that the monitoring activities are implemented as intended, perform and document corrective actions when a deviation from a critical limit occurs, and maintain the necessary records to demonstrate they are implementing and maintaining the HACCP System. These regulatory requirements are laid out in 9 CFR 417.2-417.5 and verified by inspection personnel.

NERCC must also conduct routine sampling for verification of food safety procedures. Poultry carcasses are sampled for Generic *E. coli* as a means to verify that they are implementing effective slaughter sanitary dressing procedures or proper removal of visible fecal material, ingesta, or other contaminants. Samples are obtained and sent to an approved laboratory for analysis. Inspection personnel verify that NERCC is conducting the ongoing sampling and that their sample results meet the minimum standards, and taking actions whenever they are exceeded.

NERCC is unique from other 'Equal-To' Inspected facilities in Minnesota in that they have limited hired employees/staff that are trained in the SSOP and HACCP principles because most of the people doing the work at NERCC in the meat and poultry processing facility are not employees, but rather are the inmates or offenders at NERCC. Because of this, the burden for the implementation and maintenance falls solely on those at NERCC that have met the requirements for training in the seven principles of HACCP, which are currently Michal Jasek, NERCC Slaughterhouse Supervisor, and Becky Pogatchnik, NERCC Institutional Supervisor. They work closely with inspection staff to ensure regulatory requirements are being met, while trying to balance supervising the NERCC offenders and training them in conducting the slaughter and processing activities.

If a vocational training program is implemented at NERCC, there will be a definite need for additional staff to assist in the training component for offenders as well as staff dedicated to the maintenance and implementation of the SSOP and HACCP Systems. In addition, a portion of offender training may be

learning the basic concepts around SSOP and HACCP systems. The current staffing resources at the facility are not adequate to cover both training of offenders and implementation maintenance of food safety and facility requirements.

Staffing and Personnel Requirements

Current Staffing and Supervision at NERCC

The NERCC slaughter plant is currently under the direct supervision of Michal Jasek. Technical experience and strong leadership are critical for successful management and oversight of the offenders on the NERCC slaughterhouse work crew. Mr. Jasek went to trade school at the age of 14 and graduated at age 17 while growing up in the Czech Republic. He continued working at slaughterhouses until he came to the United States. Jasek worked two years at several meat markets in the Duluth area prior to his work at NERCC. He has been working at NERCC almost twelve years and has also been operating his own successful, licensed, custom-exempt processing business since 2005.

The slaughterhouse operates five days per week (weekdays only) from approximately 7:30 to 11:30 am and for several hours in the afternoon on those days. Jasek stated that a work crew of 8-10 men is ideal on poultry processing days. The work crew can be limited due to constraints with the offenders' length of stay at NERCC and conflicts with some of the counseling or treatment meetings that offenders are required to attend. This can affect the amount of time it takes to train the offenders in the skills needed to be proficient with slaughter and processing, often extending the amount of time it takes to train the work crew members. There also are times when crew members may be taken off the work crew due to disciplinary actions, which means Jasek must continue with fewer workers to complete the duties in the slaughterhouse.

During the summer months, the slaughterhouse primarily processes poultry. The NERCC raises their own turkeys and chickens, which are all slaughtered and processed at the slaughterhouse for use at their commissaries; therefore, poultry is slaughtered year round at the facility and occurs typically 1-2 days per month. The focus of poultry processing during summer months helps the work crew gain proficiency in this area.

The NERCC conducts poultry slaughter and processing under inspection, but also takes in locally raised poultry from farmers in the area and processes them under custom exempt requirements. Custom-exempt poultry must be returned to the owner of the birds for use by that individual and immediate household and cannot legally be resold. In the past, the NERCC has processed poultry under 'Equal To' inspection for a local farmer for his resale at farmer's markets; however, this type of inspection has not typically been used with birds from farmers in the area. From a regulatory perspective, the NERCC could relatively easily expand operations to include this type of processing once they have a new facility. By doing so, they could serve local community needs while providing additional training opportunities for offenders in the training program.

In the fall, the slaughterhouse accepts locally raised livestock for custom slaughter and processing. They mainly process beef and hogs, but could also accept sheep, goats, and other red meat species. The NERCC is also currently approved for hog slaughter under 'Equal To' inspection, which allows the facility to use the hogs raised on their work farm to make pork products that are served in the prison commissary. Due to the challenges with training and limited staffing, red meat slaughter and processing primarily occurs on a seasonal basis. The work crew also breaks down carcasses into trim and raw cuts, as well as performs further processing including curing and smoking of hams. This requires additional oversight and training of the work crew by Mr. Jasek.

Slaughter and Processing Workload

To expand the services they offer and meet additional community needs for processing and slaughter, the NERCC would need additional resources for oversight of offenders and intake of animals, as well

as resolution of some issues which affect the availability of offenders for slaughterhouse work on a regular basis. The availability of trained labor is a significant limiting factor for how much and when slaughter and processing is conducted.

As noted above, current staff already have extensive duties with respect to the slaughterhouse activities, and some are cross-utilized with other programs at NERCC. Currently, there is only one dedicated staff, Michal Jasek, to slaughterhouse activities, and assistance comes from his current supervisor, Becky Pogatchnik. She is the Institutional Supervisor at NERCC and oversees the crew leaders (i.e. Michal Jasek) and cook counselors. She has many other duties as well, including but not limited to offender classification, offender discipline, resident council, and policy and procedures. She recently took on the added responsibility of assisting with the Hazard Analysis and Critical Control Points (HACCP) Systems revisions and implementation which was required in order to maintain their State Equal-To Status. Additional staffing resources would be critical to ensuring an adequately supervised training program can be created.

Program Coordination

The MDA received a general fund appropriation of \$75,000 for fiscal year 2016 to support this study and the implementation and development of the pilot program. An additional \$75,000 was appropriated for fiscal year 2017 and into the future to support the program coordinator. At a minimum, a full-time program coordinator will be required to oversee the training program, work with the staff at the NERCC and assist in oversight of trainees as the program continues past the pilot phase. Additional NERCC staff may be necessary to support expansion of activities, but the extent of that is not currently known as it will depend on how fast and to what extent the NERCC will increase services as a result of and part of the training program.

Inspection Resources

Minnesota 'Equal To' Inspection is a continuous inspection program, as is USDA Inspection. In these programs, all animals slaughtered for sale, or in this case, distribution into the NERCC or other correctional institute commissaries, must be slaughtered with an inspector present to observe carcasses for disease conditions, contamination and other food safety concerns. The inspector must also be present at least once during each day of processing these meat and poultry products, during which they observe sanitation, review records and verify that the plant is meeting other regulatory requirements.

Because of the intensity of inspection, having adequate inspection resources is an important part of expansion of services. NERCC can continue under Minnesota 'Equal To' Inspection for their current inspection needs and can even expand services to work with local farmers who will be selling their products within Minnesota. To date, this is the extent of inspection that has been necessary. Moving into USDA inspection is also an option, and plant remodeling activities have taken this into consideration, so that if the need for even wider distribution of products arises, the NERCC will be able to meet facility requirements.

Currently, the Minnesota 'Equal To' program has adequate resources to staff current inspection needs at NERCC. However, should NERCC expand operations, the MDA may need to acquire additional inspection resources and funding to support inspection during a larger span of time. Inspection resources can be fluid and often depend upon the inspection needs of other facilities in the same geographical area, so an accurate prediction of inspection needs cannot be made at this time.

Processing Capacity and Demand

Local Processing Demand

Anecdotally, many have shared their concerns about the lack of meat processing capacity in Northeastern Minnesota. In particular, this applies to 'inspected' (either Minnesota 'Equal To' or USDA) slaughter and processing, as there are very few plants located in this area of the State that are currently under an inspection program, other than custom exempt. Farmers who wish to have livestock or poultry slaughtered and processed for sale at farmers' markets or to local grocery stores have few options and often must travel a long distance to have animals slaughtered or processed (Jenna Ross, Star Tribune, 2015).

In September of 2014, the Minnesota Institute for Sustainable Agriculture (MISA) conducted an email survey of small scale livestock producers that was intended to collect information from producers who were interested in marketing their livestock and poultry products locally. In this survey, respondents were asked if the numbers of livestock they have processed was limited by access to inspected processing in the state. Four of the five counties involved with the Northeast Regional Correctional Center (NERCC) system had respondents to this survey. Respondents in all 4 counties that responded said that they were limited by access to inspected processors. The results of this survey show a definite need for inspected ('Equal To' or USDA) slaughter and processing in the northeastern part of the state as well as state-wide. (Minnesota Institute of Sustainable Agriculture, 2014)

Additional study work has been done on the demand and interest in locally raised meats in northern Minnesota. In a study published by Renewing the Countryside in December of 2015, a survey of consumers was done to reviewing their purchasing habits and interest in purchasing locally raised meats. This study found that consumers in Northeastern Minnesota were interested on purchasing locally raised meat and were willing to pay more for it. However, they gave their main reason for not purchasing these products as it was hard to find or buy (Renewing the Countryside, 2015). While consumer demands from a survey do not always translate into actual sales of meat, this survey is a good indicator that local farmers likely have markets for their products if they can find locations to have it slaughtered and processed under inspection.

NERCC Processing Capacity

It is likely that the current level of slaughter and processing activities conducted at NERCC are not sufficient to support a year-round, or possibly even, a seasonal butcher training program at NERCC. From Oct 1, 2014-Sept 30, 2015, NERCC only processed 120 swine and 2650 chickens under 'Equal To' inspection, which is very small even in comparison to other small plants within Minnesota (Minnesota Department of Agriculture, 2015). Under the custom exemption, which allows slaughter only for the use of the owner of the animal and nonpaying guests, NERCC reported processing 4500 chickens, 350 turkeys, 34 cattle and 18 pigs during 2014 (Public Information Services, 2015). These numbers alone are unlikely to provide enough repetition to create a viable training program, so other options, including expansion of services will need to be explored.

Further research needs to be done to determine exactly how NERCC could most easily increase their processing capacity. Many of the barriers cited earlier in this report, such as difficulty finding enough slaughter workers at given times, and availability of enough staff to supervise and provide guidance, must be addressed prior to NERCC increasing their services and expanding. Without additional funding for full-time meat plant staff to help run the establishment when inmates are not available, it may not be feasible for NERCC to expand.

Potential Partnerships

During discussions with NERCC staff, a number of other ideas for potential partnerships with a variety of agencies and businesses were identified. These options were not explored in depth, but were identified for further study and potential incorporation into the training program during or after the pilot phase. Some of these partnerships include, but are not limited to: Adult Basic Education, area businesses, the MDA, and Lake Superior College. Partnering with area meat processors in an effort to provide potential employment opportunities or internships/apprentices for offenders immediately after completing their time at the NERCC could potentially be a good way to incorporate the offenders into the local community and help them build relationships and job experience.

Additional work on identifying potential partners and relationships will continue during the pilot phase of the program. It is currently unknown whether additional resources would be needed to fully explore these opportunities or further develop partnerships that already exist between existing agencies/businesses and the NERCC's training program.

Next Steps

Several activities are being planned for the next steps in this project. In the short-term, MDA staff intend to continue to work with the NERCC staff to:

- Identify equipment needs and potential funding sources for the new facility and the potential training program;
- Survey offenders entering the NERCC to determine the interest level in the proposed training program; and
- Hire a program coordinator who will work at the NERCC and with the MDA in developing the proposed program and addressing the barriers identified in the work so far.

Over the next year, the MDA intends to, with the assistance of the program coordinator position, develop and implement curriculum for the training program, work with the NERCC staff to identify ways to ensure inmates can achieve the necessary level of work experience for an adequate training program, and work with the NERCC to explore ways of expanding processing capacity so that a training program can be effectively implemented.

Summary

The majority of the work completed on this project thus far have involved the sharing of ideas and information with the NERCC staff to identify the benefits and challenges of implementing the meat processor training course at the NERCC. Several benefits of this project are easily identified, including:

- Providing an opportunity for inmates to obtain technical education at the NERCC using activities that are already happening on some level;
- Expanding meat and poultry processing capacity in northeastern Minnesota, which has an apparent shortage of processors available to farmers; and
- Enabling the NERCC to update its facilities and food safety systems so that they can process food in a safe environment that meets the regulatory requirements.

Barriers to the implementation of this project were also identified:

- The length of stay at NERCC for the average inmate may make participation in a formal training program difficult;
- Current models for providing training and treatment at the NERCC pull inmates away from their work responsibilities on a frequent basis; and

- Expansion of processing and slaughter activities at the NERCC may require additional full-time resources to accomplish, especially on a more than seasonal basis.

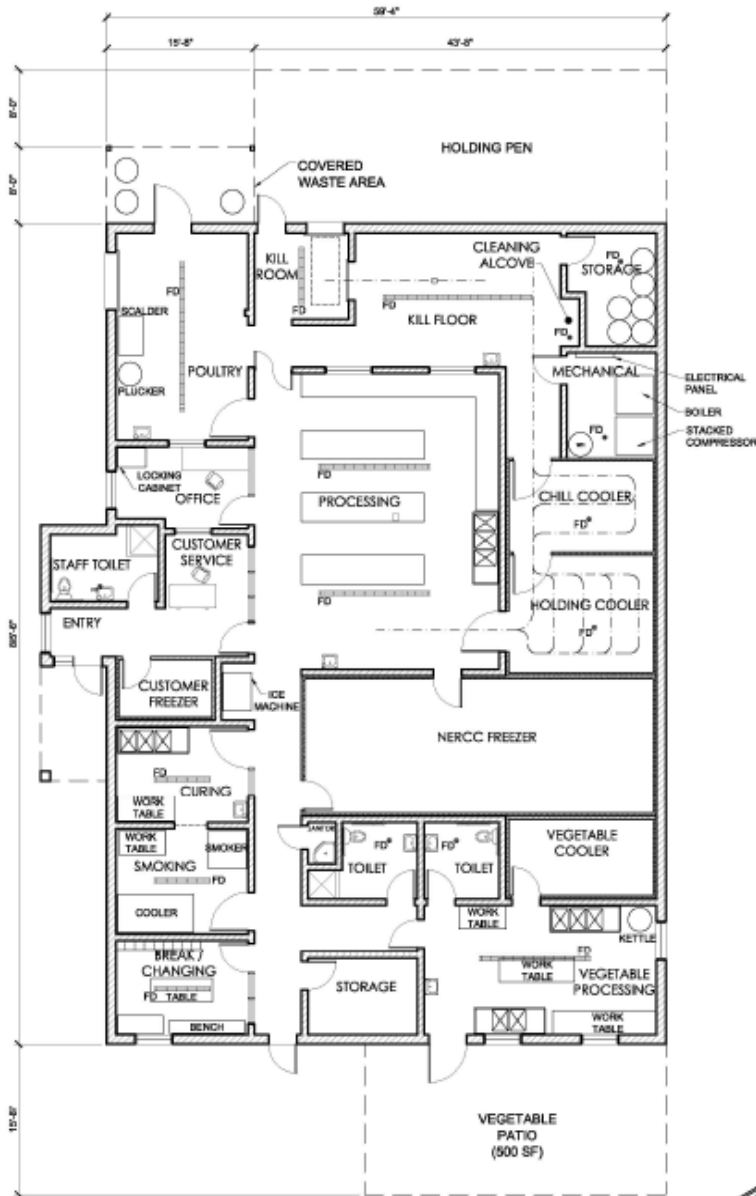
Work on this project is expected to continue as the MDA works with NERCC staff to identify ways to address the barriers, take advantage of the opportunities presented and create a training program that can be accomplished with the current resources available.

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Appendices

Appendix 1: Draft floor plan for new NERCC facility, dated February 11, 2016.



1 FLOOR PLAN
A2.0 1/8"=1'-0"



PRELIMINARY
NOT FOR CONSTRUCTION
DATE:



SCALZO ARCHITECTS, LTD.
1901 South Street
Duluth, Minnesota 55812
Tel: 218.722.4379
Fax: 218.722.3535

CONSULTANTS:



102 South 21st Ave. West Suite #1
Duluth, MN 55808-2719
Voice: 218.727.8855
Fax: 218.727.1770
www.nce-engineers.com

PROJECT:

NERCC PROCESSING BUILDING
6102 ABRAMSON ROAD
SAGNAW, MINNESOTA 55779

OWNER:
ARROWHEAD REGIONAL
CORRECTIONS (ARC)
100 N 5TH AVE W #319
DULUTH, MN 55802

FLOOR PLAN

REVISIONS:

DATE: FEBRUARY 11, 2016
DRAWN: AWS
CHECKED: WBS
PROJECT: 1538



FULL SCALE

SHEET NO.

A2.0

Appendix 2:

Results of Processor Survey on Employment Needs and Proposed Training Program

Question 1. What type of operations does your plant(s) have? (Check all that apply)
Note that an establishment may have more than one kind of operation.

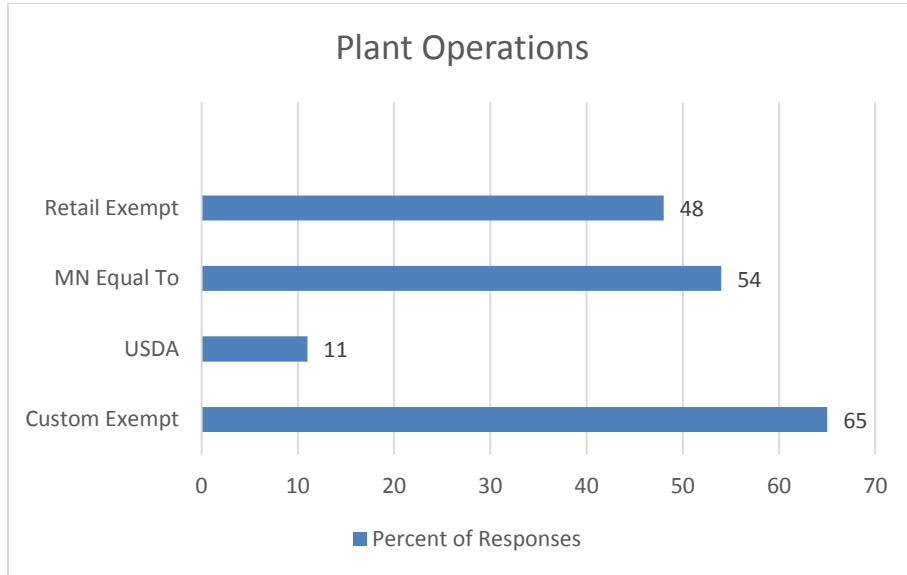


Table 1. Question 1 Response Summary

Response Option	Percent of Plants	Number of Responses
Retail Exempt	48	18
MN Equal To	54	20
USDA	11	4
Custom Exempt	65	24

Question 2. How difficult is it to hire entry level personnel?

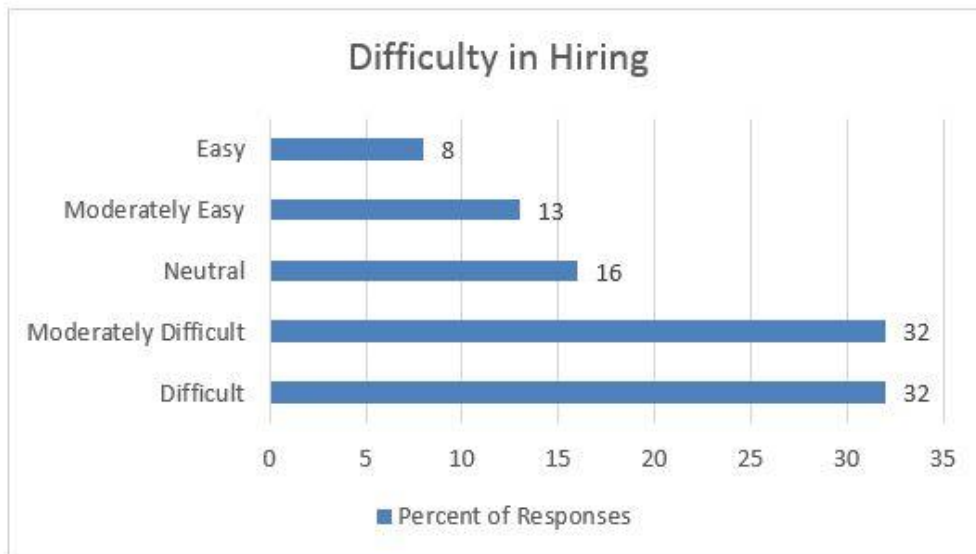


Table 2. Question 2 Response Summary

Response Option	Percent of Plants	Number of Responses
Easy, not usually a problem to find someone	8	3
Moderately Easy, most times we can find someone	13	5
Neutral, sometimes we find people to work, but sometimes we don't	16	6
Moderately Difficult, many times we can not find people to work	32	12
Very Difficult, very few applicants or people willing to work	32	12

Question 3. How important is previous experience working in the meat industry to you when you consider a job applicant?

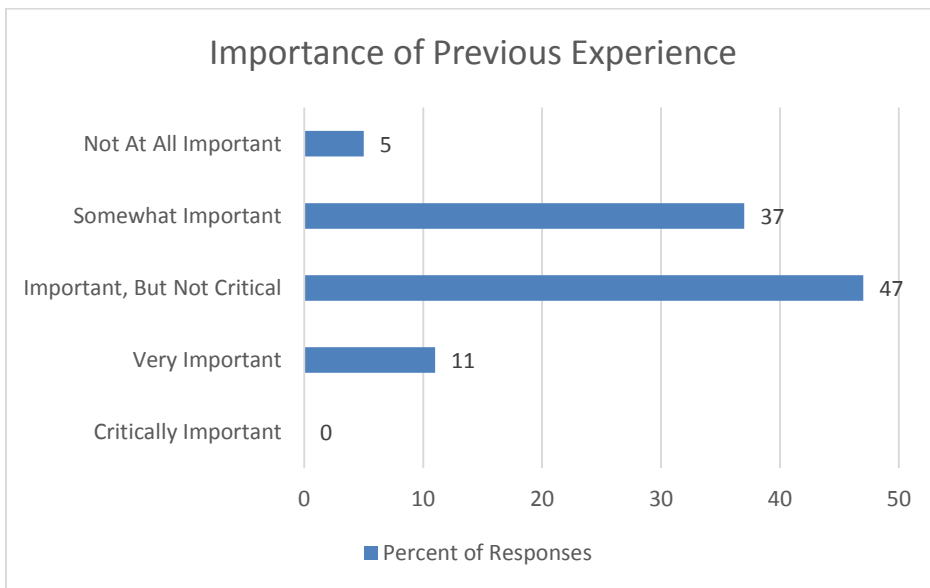


Table 3. Question 3 Response Summary

Response Option	Percent of Plants	Number of Responses
Not important at all, I'd rather train	5	2
Somewhat Important	37	14
Important, But Not Critical	47	18
Very Important	11	4
Critically Important	0	0

Question 4. How frequently do you have a job applicant with previous experience in the meat cutting industry?

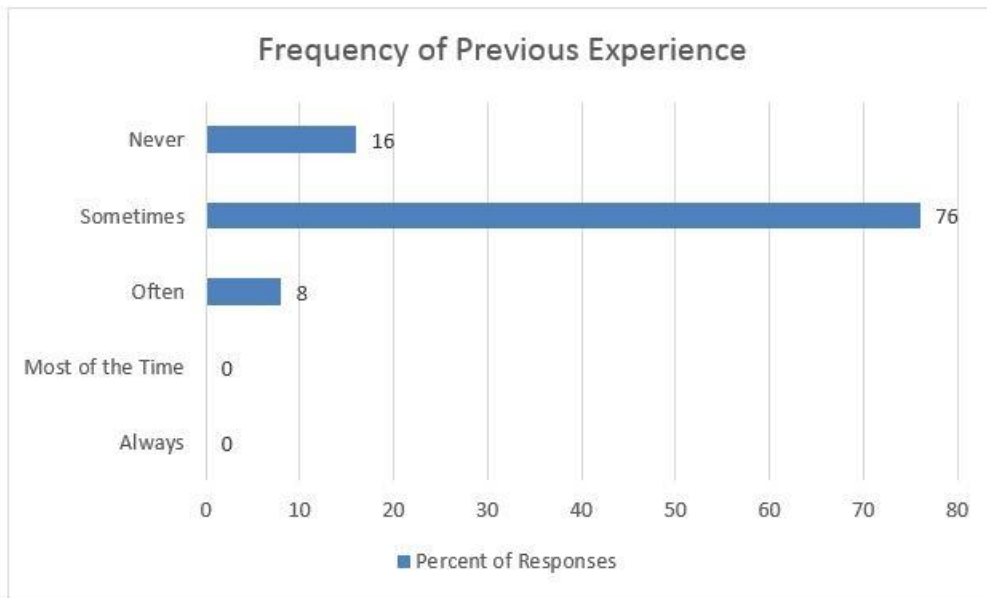


Table 4. Question 4 Response Summary

Response Option	Percent of Plants	Number of Responses
Never, so I take what I can get	16	6
Sometimes, but not usually very skilled	76	29
Often	8	3
Most of the Time	0	0
Always	0	0

Question 5. What factors do you believe hinder your ability to find personnel to hire? (Check all that apply)



Table 5. Question 5 Response Summary

Response Option	Percent of Plants	Number of Responses
Your Business Location	11	4
Lack of Hours	14	5
Inability to Pay at a Higher Rate or Lack of Pay	46	16
Difficulty of the Type of Work Available	51	18
Lack of People with Previous work Experience	46	16

Question 6. If you had an applicant for an open position with previous work experience in the meat industry, what skills would you consider most valuable? Rank the following skill sets in order of value, with 1 being the most valuable and 4 the least valuable.

Table 6. Question 6 Number of Responses Summary

Response Option	Most Valuable (1)	(2)	(3)	Least Valuable (4)	Average Score
Slaughtering	4	11	5	13	2.18
Processing, including Cutting, Wrapping and Packaging	23	6	1	3	3.48
Recordkeeping and Regulatory Knowledge	3	6	13	13	1.97
Smoking Products and Sausage Making	5	12	15	4	2.50

Question 7. The proposed training program would train non-violent criminal offenders in basic meat cutting skills in a minimum security work house setting. Would you hire someone who had a non-violent criminal record (such as probation violations, DUI, drugs, etc.) but had some specialized training or a certificate in meat & poultry slaughter and processing?



Table 7. Question 7 Response Summary

Response Option	Percent of Plants	Number of Responses
Never	8	3
Only if I had no other options	3	1
Maybe	29	15
Probably	21	8
Yes	29	11

Question 8. When you hire a new employee without previous meat industry experience, in what salary range would you pay them?

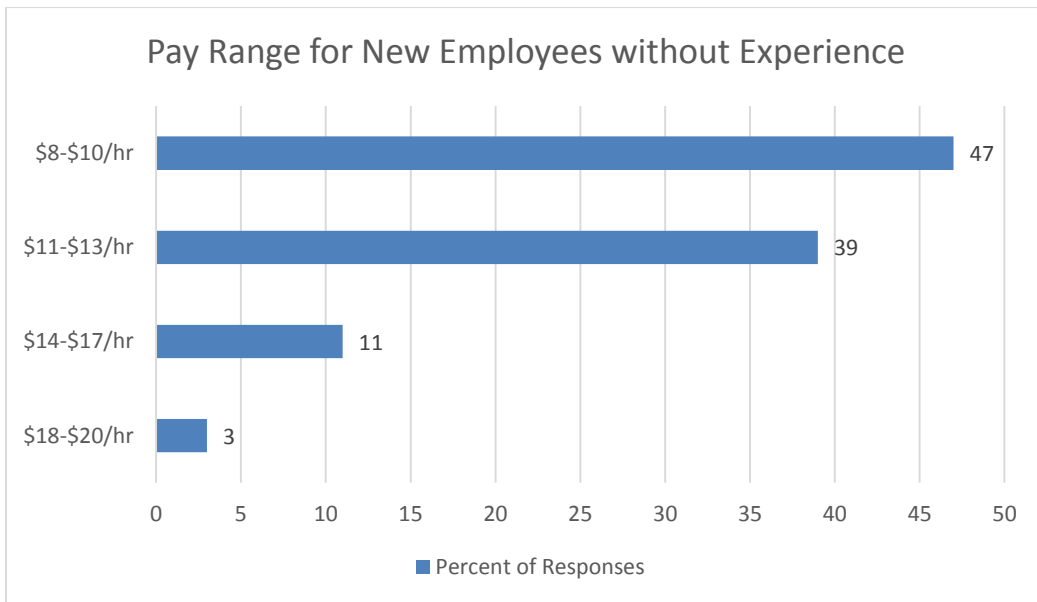


Table 8. Question 8 Response Summary

Response Option	Percent of Plants	Number of Responses
\$8-\$10/hour	47	18
\$11-\$13/hour	39	15
\$14-\$17/hour	11	4
\$18-\$20/hour	3	1

Question 9. When you hire a new employee with previous meat industry experience, in what salary range would you pay them?

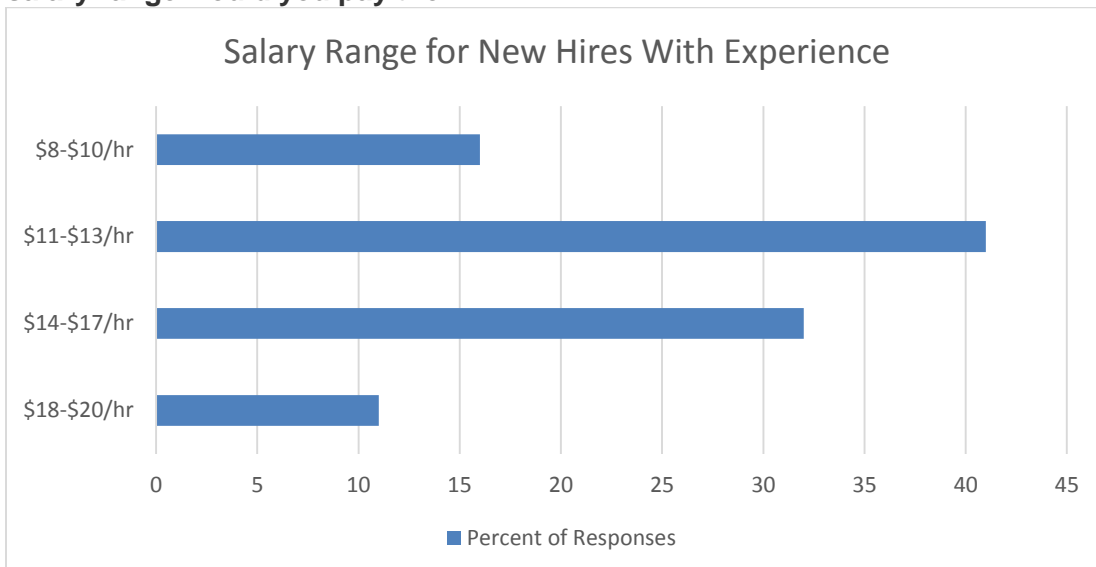


Table 9. Question 9 Response Summary

Response Option	Percent of Plants	Number of Responses
\$8-\$10/hour	47	18
\$11-\$13/hour	39	15
\$14-\$17/hour	11	4
\$18-\$20/hour	3	1

Question 10. When you hire a new employee, what type of hours are you typically able to offer them?



Table 10. Question 10 Response Summary

Response Option	Percent of Plants	Number of Responses
Full-time	54	20
Part-time	22	8
Seasonal Full-time, Part-time Rest of Year	19	7
Seasonal Full-time	3	1
I don't hire new employees	3	1

Question 11. Has a lack of trained job applicants or qualified prospective employees prevented the growth of your business? (Choose the option that most closely fits with your situation)

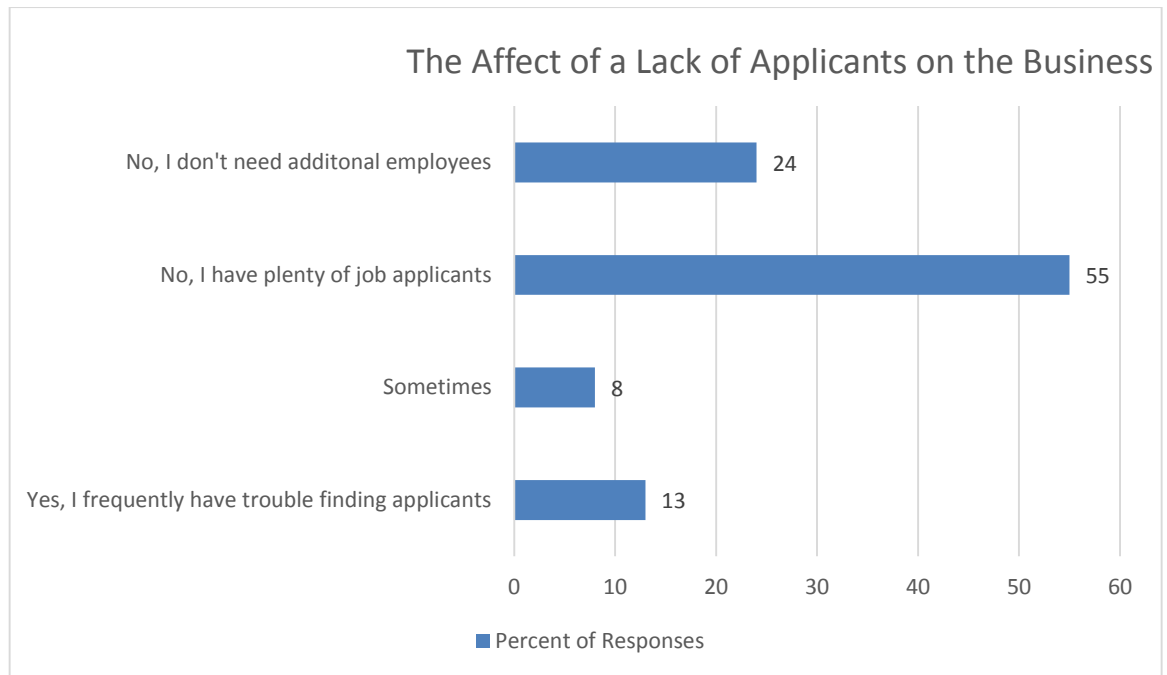


Table 11. Question 11 Response Summary

Response Option	Percent of Plants	Number of Responses
No, I don't need additional employees	24	9
No, I have plenty of job applicants	55	21
Sometimes	8	3
Yes, I frequently have trouble finding qualified applicants	13	5

Question 12. Please provide any other feedback or comments regarding employment issues you have or thoughts and concerns about the proposed training program.

Responses:

- Most of our employees are hired from within due to a union contract. We post positions and then hire from within most of the time.
- It would be good to have more trained applicants.
- am not sure this is the best thing for our industry. As custom slaughter operators we struggle with people believing I steal there meat anyway now with press about ex convicts going into the meat industry that will not help. That said I believe the right people deserve a second chance.
- If they can show up , on time , with at least moderate ambition ,we can train them . Most new employees are woefully lacking all three , making them useless in this industry
- Do a short course on Job interviews and presenting yourself. After the in house training, offer a voluntary advanced class for the people who really want to learn the meat industry
- No one is applying for jobs on the iron range. Every store has a sign in the window for help wanted.
- I would be willing to work with any person regardless of background, they just need to be willing to work and have customer skills. I also feel that this type of business doesn't have people to pass it down for future

- Being a recovering Alcoholic I would look for someone who is in a recovery program
- meat cutting and sausage making are the most important assets when hiring new employees. by far that is the most important experience as a plus!
- We have been looking for help off and on for a year now. We have applicants fill out an application and then we show them the kill floor and what we need them to do and we never see them again. I think there is definitely a need for skilled workers. Our shop is mostly on the job trained workers and it takes years to get them to a skilled level.
- I treat and pay my employees well so that I have a very low turnaround, and they stay employed for many years and most often their entire career. When I do have someone retire or have someone leave, it would nice to hire someone with experience as there is a lack of that with potential employees.
- Thanks for looking into this. I think it is very impressive for all parties involved. They need work and we need qualified people in our industry. Thanks
- I know of a program in North Carolina. One plant hired non violent offenders and one plant hire any qualified regardless of offense. The company the hired only non violent offenders had the biggest challenge with attendance. Too many drug users and drunks. I would be cautious hiring only drug users and drunks
- I feel the program should be offered to more than just the correctional facility, however not too many people would participate if it was offered at the facility.