

Module 8: *E. coli*—Basic and Other Compliance/Noncompliance

Goal To provide instructions to in-plant inspection personnel for determining an establishment's compliance with the pathogen reduction requirements.

Objectives After completing this module, participants will be able to:

1. Identify the role of in-plant inspection personnel in *E. coli* testing verification. **Page 2, paragraph 1**
2. State the regulatory requirements for *E. coli* plans/procedures. **Pages 2 and 3, item numbers 1, 2, and 3**
3. Verify that *E. coli* plans/procedures meet regulatory or performance standards requirements. **Be able to use checklists.**
4. Document findings and take enforcement actions when regulatory requirements are not met. **Page 3, last paragraph; page 5, last paragraph**
5. Use noncompliance trend indicators. **Page 3, number 3 under Basic Documentation; Page 5, first paragraph under Other Documentation**

Steps

- Introduce the video.
- Play the video.
- Conduct the workshops.

Facilitator's Notes

Tell participants that you will put what will be covered in the module in perspective with the HACCP-Based Inspection System.

(Post the *E. coli* Basic and Other pieces on the graphic representation of the components of the HACCP-Based Inspection System.)

Explain to participants that they will receive an introduction to the Microbiological Sampling activity in Module 8. The module covers Basic Compliance checks and Other Requirements for *E. coli* testing. The Basic procedure is performed to verify that the establishment's plan meets the basic requirements outlined in the regulations. The Other Compliance procedure is performed to verify that the establishment is following its *E. coli* testing plan. Explain that the chart should help participants visualize the components of the HACCP-Based Inspection System.

Play the video for module 8.

At the conclusion of the video segment, stop the tape.

Introduce the first workshop. Read the Workshop instructions to the participants. Refer them to the material in the notebook that covers topics presented in the video.

Allow 90 minutes for participants to complete the workshops.

Using the Facilitator's Key, review workshop answers. Allow participants to ask questions or discuss points. Allow approximately 15 minutes for this review and discussion of each workshop.

For Facilitator information only, the following updates are made to Participant's Handout.

Page 2, Basic Requirements, Bullet #1 – The procedure must identify an establishment employee(s) (job title or name) designated to collect *E. coli* samples.

Page 3, Basic Compliance/Noncompliance – Perform procedure 05A01 to determine the establishment basic compliance/noncompliance for the *E. coli* requirements when a plant comes under inspection or changes its *E. coli* sampling plan. The *E. coli* special team performed the initial basic compliance procedure. If the basic procedure has been conducted by the special team, it is **not** necessary to conduct procedure 05A01 again when HACCP is implemented.

Page 4, Bullet # 4 – Notify the District Office. ~~Send a copy of the NR to the District Office.~~

(Take down the *E. coli* Basic and Other pieces. The chart will be re-introduced at the beginning of Module 9a.)

Facilitator Note: To ensure participant's understand the FSIS role for *E. coli* sampling please reiterate=>

E. coli sampling is required to be performed by industry in cattle, swine, chicken and turkey slaughter establishments as an indicator of sanitary dressing process control. Remember, they are performance criteria, which means the results are not enforceable regulatory standards. However, there are three basic regulatory requirements (written procedure, performing testing, and recording results) that the establishment is required to meet or inspection **will** be withheld. Also, there are several on-going or other requirements that the establishment must meet. While individual noncompliance with the other requirements does not lead to enforcement actions other than documenting on an NR, they help to paint a part of the overall picture of control within the establishment. It is therefore crucial to document all noncompliance. In cases of repeated noncompliance, inspection personnel should contact the DO for guidance on additional enforcement actions. This module is intended to help clarify the Basic and Other regulatory requirements.

For Facilitator information only, the following updates were made to the workshops.

Moved the instructions for the basic checklist to the beginning.

Provided a variety of company names to be more realistic.

Added information to scenarios (e.g., NR information).

Reformatted Q&As.

Added "location of testing" in Workshop 4.

Added Workshop 5 covering SSOP records to help depict the "bigger picture".

Added procedure schedule for completion by participants.