

Module 9c: Other Compliance/Noncompliance - SSOP

Goal To provide instructions to in-plant inspection personnel for determining an establishment's compliance with HACCP, SSOP, *Salmonella* and other non-related HACCP and Pathogen Reduction requirements.

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

1. Define what "Other compliance/noncompliance" means related to SSOP procedures. **Page 4 (Performance of Inspection Procedures)**
2. Be able to apply the SSOP inspection procedures. **Throughout document**
3. Be able to document findings and take enforcement actions when SSOP inspection procedures are not met. **Pages 9, 10**

Other Compliance/Noncompliance - SSOP

Steps

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

Post the SSOP Other piece on the graphic representation of the components of the HACCP-Based Inspection System in its place.

Explain to participants that this module introduces the “Other Sanitation” element for the SSOP inspection program. Explain that the chart should help participants visualize the components of the HACCP-Based Inspection System.

Introduce the video by reading the goal and objectives of this module.

Show the video – Tell participants that page 4 of the script is different from the video, but the script is correct (The definition of the monitoring trend indicator has been clarified).

Go over the participant’s handout

Discuss questions

Have the participants complete the SSOP trend indicator workshops

Pass out answer keys and review

Answer any remaining questions on Module 9c

Take down the SSOP Other piece. The chart will be re-introduced at the beginning of Module 9d.

Go to Module 9d

FACILITATOR NOTES:

For Facilitator information only:

The Participant’s Handout has been updated to provide clarification on SSOP trend indicators by making the following revisions:

Pages 3 and 5 (Monitoring) was moved from “maintenance or effectiveness” to “implementation”.

Page 7 - Replaced descriptions for SSOP trend indicators.

Play the video for Module 9c. Then stop the tape. Ask participant's the following questions. Use these questions as "talking points". Participants can refer to page 10 of their handout to follow along.

1. What are the major changes concerning inspection of SSOPs?

Answer: The way in which inspection personnel perform their inspection and take enforcement actions are the same! The directives and terminology have changed. The comparison chart is a useful reference tool.

2. The ongoing operation of an establishment's SSOP procedures must meet what 4 regulatory requirements?

Answer: Implementation (**monitoring**), effectiveness (~~monitoring~~), corrective actions, and recordkeeping.

3. What are the two inspection procedures for determining noncompliance with the other SSOP requirements?

Answer: Review and observation and recordkeeping.

4. What are three parts of the review and observation procedure?

Answer: Direct observation of the establishment's implementation and monitoring of the SSOP procedures and required corrective actions; assessment of the sanitary conditions through organoleptic examination of a sample of facilities, utensils and equipment; and a comparison of inspection findings with plant records.

5. Performance of the recordkeeping procedure includes:

Answer: Verification that SSOP procedures are being followed by plant personnel before and during operations; monitoring activities are conducted at the specified frequency; all three requirements of corrective action (416.15) are implemented and documented; and establishment employees/positions authenticate records with their initials and date.

6. What are the regulatory (416.15) requirements for the corrective action that an establishment must take when either the establishment or FSIS determines that the establishment's SSOP's failed to prevent direct contamination or adulteration of product(s)?

Answer: Procedures to ensure appropriate disposition of product(s) that may be contaminated; restoration of sanitary conditions; and measures to prevent the recurrence of direct contamination or adulteration of product(s).

7. If SSOP noncompliance is determined – what questions need to be answered to determine if there is an inadequate system?

Answer: 1) Is there noncompliance for the same root cause? 2) Are the basic regulatory requirements met?

8. What is the appropriate enforcement action if the system is determined to be inadequate?

Answer: Withhold inspection and notify the establishment. Provide plant management a copy of the NR. Notify the DO of actions taken. The DO will assign a CO who will visit the establishment and initiate a case file. The DM will provide instructions for enforcement actions from this point.