

DONNING AND DOFFING FREQUENTLY ASKED QUESTIONS

Q. I am the Inspector- in-Charge (IIC) in a poultry slaughter plant. This plant requires gloves in their GMPs for employees only if the employees have acrylic nails, nail polish, rings with stones, or cuts on their hands. Are gloves a required item, and should they be included in the time measurement for donning & doffing?

A. Yes, gloves are required by the plant under certain conditions. You should include gloves in the time measurement even where the glove is required because of something the employee chooses to do (e.g., wear nail polish causing the glove to be required). It will be difficult to keep track of items required by the plant in all circumstances versus items required by the plant under certain conditions. The same would hold true for beard nets. If they are required for men with facial hair, they should be counted in the time measurement.

Q. I am the IIC of a large livestock slaughter facility. Last year we consolidated all the required items like hair nets, ear plugs, and gloves into a filing cabinet in the USDA office. However, now the inspectors have to line up to obtain these required items every day, and it seems to have increased the gathering time for donning & doffing required gear. I am not sure the time measurement that was done in 2011 is actually representative of the gathering time. What should I do?

A. Determine a location that will be readily accessible for all employees that will reduce congestion during the gathering process if possible. Before moving the items, notify the local union representative of your intention to move the items to make them more accessible. If you move the required gear, you will need to complete another time measurement. Don't forget to notify the designated union representative and plant management and allow them the opportunity to observe the new time measurement. If the time measurement is modified, issue a new MOI to establishment management, and post a copy for FSIS employees. These instructions are covered in FSIS Directive 5090.1.

Q. I am an IIC of a poultry slaughter plant. Do poultry inspectors need to prepare their work stations as described in FSIS Directive 5090.1?

A. No, poultry inspectors do not prepare inspection stations like livestock inspectors. Poultry inspectors carry lot tally sheets to the inspection station and place them in the designated location. This should be captured by your time measurement as described in FSIS Directive 5090.1 Donning and Doffing Measurement Section V. G.

Q. I am the IIC of a poultry slaughter plant. What should I do if the inspection stations have water dripping off the overheads, lights, and the inspector chairs are wet at the start of the shift? Is wiping down the station part of preparation of the station, and should this be including in the time measurement?

A. No, poultry inspectors do not prepare inspection stations. These activities should not be included in the time measurement. The plant is responsible for providing adequate conditions

for post mortem inspection. Inspectors should only stop the line and notify their supervisor when conditions exist consistent with FSIS Notice 50-12, Inspection Responsibilities for Reducing Slaughter or Evisceration Line Speed.

IICs or supervisory in-plant personnel need to ensure that plant management provides inspection stations in acceptable condition for inspection personnel. Dripping water and wet chairs or wet inspection stations should be addressed by plant personnel prior to the start of operations.

Q. I am the IIC of a poultry slaughter plant, and this establishment requested donning & doffing within the schedule of operations. I obtained the following time measurements: gathering required items 1 minute 20 seconds, donning, walking, required hand wash, and carry lot tally sheets to inspection station was measured to be 2 minutes 56 seconds. Rinsing gloves, walking back to location of donning and doffing, dropping off lot tally sheets, doffing, was measured to be 1 minute 58 seconds.

What should the donning & doffing times be for this establishment, and what time do the inspectors need to be on the line at the start of the shift?

A. You are to add together the minutes and seconds from each component measurement and then round, for each component measurement, the cumulative total, up or down to the closest minute (less than 30 seconds, rounded down; 30 seconds or more, rounded up). In this example, the total time is 6 minutes and 14 seconds, which rounds down to six minutes. Inspection personnel are entitled to 4 minutes for gathering donning, walking, handwash, and carrying lot tally sheets to the designated area. Therefore, they would be expected to be at their inspection station 4 minutes after the scheduled start of operations.

Q. I am the Frontline Supervisor of a processing circuit. There are no slaughter plants in my circuit. Do I still need to conduct time measurements and complete MOIs?

A. Yes, if the establishments elect not to request certain off-line verification procedures, (e.g., pre-operational sanitation verification) to be conducted during overtime. See FSIS Directive 5090.1, Donning and Doffing Measurement, Section VII. A discussion with establishment management of the final rule needs to take place in all establishments. In addition, an MOI capturing the meeting needs to be provided to establishment management and posted for FSIS employees. If the establishment elects to have certain off-line procedures, such as pre-operational sanitation inspection, conducted within the schedule of operations rather than on overtime, a donning time measurement will need to be conducted and documented on a MOI. If the establishment elects to have off-line procedures conducted on overtime, then FSIS personnel are to inform the establishment that donning and doffing procedures will be conducted within the requested overtime period. Be sure to document this conversation with establishment management within an MOI. For example, the establishment's start time is 0600. On days when pre-operational sanitation verification is conducted by IPP the establishment requests 15 minutes of overtime and a start time of 0545. In this situation, IPP would (starting at 0545) don required gear and walk to the department and conduct the verification within the overtime period. In this case a measurement would not be

needed. If the establishment does not normally request 15 minutes of overtime a measurement would need to be conducted. In addition, the establishment would need to understand that IPP would start donning at 0600.

Q. I am the IIC at a large beef slaughter operation and the establishment provides knife sharpening for inspection personnel. Sometimes, the plant quits early, and inspectors have asked about sharpening their own knives during this time since they are technically still in a pay status within their tour of duty. Would it be permissible at establishments that do offer knife sharpening for inspection personnel to sharpen their own knives as long as this activity occurred during their scheduled tour of duty?

A. Yes, under certain conditions. All inspection personnel are required to use the knife sharpening services if offered by the establishment. There may be times that the establishment is down or not operating. If the supervisor has not assigned other work during these periods, inspection personnel could choose to fine tune their knives during these periods. However, it is important for supervisors to understand that knife sharpening duty is defined as being part of the 8-hour work day. If the inspector chooses to fine tune their knives, it should be done within their tour of duty, or during any minutes left over within an overtime period already being charged. Inspection personnel are not to do this duty if they are within an unpaid status, e.g., during the lunch period.