

Commonly Asked Questions from Small and Very Small Plants on Corrective Actions (1)

Question 1: Am I required to document SSOP and HACCP corrective actions on the NR, or do I have to write them on my company record?

Answer 1: The requirement in 9 CFR 416.16 and 417.3(c) is that you document Sanitation SOP and HACCP corrective actions. The establishment can document these corrective actions on its records or on the NR. If the documentation is on the NR, the NR becomes part of the HACCP or Sanitation SOP records and is required to meet the recordkeeping requirements of those regulations.

Question 2: If I find a noncompliance and take appropriate corrective actions, would the inspection program personnel also complete an NR?

Answer 2: No. If the establishment finds noncompliance and brings itself into compliance with the regulatory requirements, inspection program personnel should not issue an NR.

Question 3: If I write that I will retrain employees as my preventive measure in response to a NR that was written as a result of my SSOP failing to prevent direct contamination or adulteration of product, will all NRs with this preventive measure be linked?

Answer 3: A thorough process should be carried out to determine the cause of each noncompliance. If the establishment determines the cause of the subsequent sanitation noncompliance is lack of, or insufficient, employee training, the NRs should be linked as they are issued and discussed with establishment management at the weekly meetings. These criteria are listed in the answer to Question 3 of the **Commonly Asked Questions from Small and Very Small Plants Regarding Noncompliance Records (NR) (1)** posted at the following link.

http://www.fsis.usda.gov/Help/FAQs_TSC_NR/index.asp.

Question 4: Do inspection program personnel have to agree with SSOP corrective actions before removing the retain/rejected tag?

Answer 4: Inspection program personnel have been trained not to remove the regulatory control action until the establishment proposes corrective actions that meet the regulatory requirements of 9 CFR 416.15. Inspection program personnel have also been trained that the same preventive measure proposed on a previous NR may not be an effective preventive measure, since it was not effective in preventing the noncompliance from recurring.

Question 5: Can I use employee training multiple times on my Sanitation SOP records as a preventive measure to meet the requirements of 9 CFR 416.15?

Answer 5: The establishment may document employee training multiple times as a preventive measure on its Sanitation SOP records. If the establishment documents employee training as a preventive measure, the training should also be documented when it occurs. However, if after repeated employee training has occurred,

inspection program personnel find the Sanitation SOP failed to prevent direct contamination or adulteration of product, employee training may not be accepted as an effective preventive measure by inspection program personnel.