

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS DIRECTIVE

5090.1

11/30/12

DONNING AND DOFFING MEASUREMENT

I. PURPOSE

A. This directive provides Supervisory Public Health Veterinarians (SPHVs), Supervisory Consumer Safety Inspectors (SCSIs), and Frontline Supervisors (FLSs) instructions on how to measure the time it takes them to retrieve and don required gear, walk to an on-line station, set up the inspection station (if applicable), retrieve and return lot tally sheets (if applicable), walk back from the on-line station, and clean and doff required gear. These personnel will measure these times primarily for on-line personnel.

B. Current time measurements at meat slaughter establishments may not have to be re-done as a result of this directive. The instructions apply for when an establishment makes changes that would change the donning, doffing, and walk time; to establishments receiving their first grant of inspection; and, as a result of the new regulation discussed in Section II. B. to poultry slaughter establishments, so that time to pick up required forms and drop off required forms is included in the time measurement.

C. The SPHV, SCSI, or FLS will provide each establishment with the cumulative total daily time per shift for these activities. This total will also include donning, doffing, and walking time surrounding the lunch period, so that the establishment can account for it in its daily schedule of operations or as overtime.

D. This directive also provides guidance on the amount of time for the inspector to perform knife sharpening duties (when necessary) and to perform other administrative duties (such as time and attendance preparation).

II. BACKGROUND

A. On June 10, 2011, FSIS amended its regulations pertaining to the schedule of operations (See [76 FR 33974](#)). That amendment to 9 CFR 307.4(c), 381.37(c), and 9 CFR 590.124(c) defined the 8-hour workday as including the time for FSIS inspection program personnel to put on required gear and to walk to a work station, and the time for FSIS inspectors to return from a work station and remove and clean required gear (76 FR 33977). This regulation applied to any FSIS inspection program personnel including FSIS veterinarians, who are required to don and doff and be at an inspection station on the line at the start of a shift. In general, FSIS Veterinarians, off-line inspection program personnel, supervisory consumer safety inspectors, and inspectors in processing facilities and egg products plants, are not required to be at an inspection workstation at the start of or at the end of a shift. Note that there must also be an accounting for the donning, doffing, and walking time of inspection program personnel who are required to come in early, such as for pre-operational inspection (76 FR 33978). The preamble to the regulation also made clear that the lunch period, as defined in 9 CFR 307.4(b) and 381.37(b), is an authorized duty-free interruption in the inspector's tour of duty once it begins. Consequently, without exception, doffing needs to occur before the lunch period begins and

donning needs to occur after the lunch period is over (76 FR 33977).

B. On September 27, 2012 [77 FR 59291](#), FSIS made additional changes to 9 CFR 307.4(c) and 381.37(c) to define the 8-hour work day as including not only the time to don and doff and walk to and from a workstation, but the time that inspection program personnel need to prepare the inspection station, if necessary, or pick up and return a lot tally sheets; the time necessary for FSIS inspection program personnel to sharpen knives, if necessary; and the time necessary to conduct duties scheduled by FSIS, including preparing time and attendance sheets (T&A).

C. The amended regulatory language for 9 CFR 307.4(c) reads as follows:

The basic workweek shall consist of 5 consecutive 8-hour days within the administrative workweek Sunday through Saturday, except that, when possible, the Department shall schedule the basic workweek so as to consist of 5 consecutive 8-hour days Monday through Friday. The 8-hour day excludes the lunch period but shall include activities deemed necessary by the Agency to fully carry out an inspection program, including the time for FSIS inspection program personnel to put on required gear and to walk to a work station; to prepare the work station; to return from a work station and remove required gear; to sharpen knives, if necessary; and to conduct duties scheduled by FSIS, including administrative duties.

D. The amended regulatory language for 9 CFR 381.37(c) reads as follows:

The basic workweek shall consist of 5 consecutive 8-hour days within the administrative workweek Sunday through Saturday, except that, when possible, the Department shall schedule the basic workweek so as to consist of 5 consecutive 8-hour days Monday through Friday. The 8-hour day excludes the lunch period but shall include activities deemed necessary by the Agency to fully carry out an inspection program, including the time for FSIS inspection program personnel to put on required gear, pick up required forms and walk to a work station; and the time for FSIS inspection program personnel to return from a work station, drop off required forms, and remove required gear; and to conduct duties scheduled by FSIS, including administrative duties.

E. The amended regulatory language for 9 CFR.590.124 reads as follows:

Operating schedules for an official plant shall be subject to approval of the Administrator. The normal operating schedule shall consist of a continuous 8-hour period per day (excluding not to exceed 1 hour for lunch), 5 consecutive days per week, within the administrative workweek, Sunday through Saturday, for each full shift required. Clock hours of daily operations need not be specified in a schedule, although as a condition of continuance of approval of a schedule, the hours of operation must be reasonably uniform from day to day.

NOTE: The September 27, 2012 final rule did not amend 9 CFR 590.124.

F. At the next weekly meeting after the issuance of this directive, the SPHV, SCSi, or FLS (as assigned by the District Office) is to inform the establishment management that it will need to either absorb the time for the activities addressed in this directive within the schedule of operations or request overtime with the understanding that its request will be approved as an "8 minutes of overtime" request for which it will be billed for 15 minutes of overtime regardless of whether the actual time needed was less than 8 minutes. How the establishment uses any remaining time in the quarter hour, if there is any, is its decision. The SPHV, SCSi, or FLS is to inform the establishment that if it elects to make changes to its approved schedule, as required in 9 CFR 307.4(d)(1) or 381.37 (d)(1), it is to submit its updated schedule to the District Manager. The SPHV, SCSi, or FLS is also to inform the establishment that this updated schedule is to reflect the time needed to don, doff, and walk during the lunch period as well as

the duty free lunch period, the time needed for knife sharpening (if necessary), and the time needed to prepare the T&A, as determined by FSIS.

G. Additionally, the cumulative donning, doffing, and related activities time surrounding the lunch period should be used by the establishment to schedule its production to ensure on-line inspection personnel are provided the full duty-free lunch period.

III. REQUIRED GEAR

A. Required gear includes any items required by FSIS and any items that are specifically required by the establishment within such written programs as Good Manufacturing Practices (GMPs) or Sanitation Standard Operating Procedures (Sanitation SOPs). For example, in some establishments, the operational Sanitation SOPs require that all employees and on-line slaughter inspectors wear hair and beard nets.

B. Following is gear required by FSIS for:

1. On-Line Inspection - Livestock

- a. Helmet - FSIS Directive 4791.1;
- b. Cut resistant glove - inspection personnel are to wear a cut-resistant glove on the non-knife hand when performing inspection tasks that require a knife (livestock post-mortem inspection) and the assignment of two or more inspectors to either the head or the viscera inspection station. Inspectors are to also wear a second glove of impervious material over the cut-resistant glove (FSIS Directive 4791.1);
- c. Cover glove for cut resistant glove – if required under FSIS Directive 4791.1;
- d. Hearing protection – required to be worn if the noise at the work station is greater than 85 decibels (FSIS Directive 4791.1); and
- e. Scabbard (containing steel, knives and hook).

2. On-line Inspection - Poultry

- a. Helmet – FSIS Directive 4791.1; and
- b. Hearing protection - required to be worn if the noise at the work station is greater than 85 decibels (FSIS Directive 4791.1).

3. Off-Line Inspection

- a. Helmet – FSIS Directive 4791.1; and
- b. Hearing protection - required to be worn if the noise at the work station is greater than 85 decibels (FSIS Directive 4791.1).

C. Although FSIS requires inspectors to wear skid-resistant footwear, FSIS does not require that the footwear be put on at the establishment. Consequently, time spent donning and doffing required skid-resistant footwear is not to be counted in the time measurement unless an individual establishment requires that the footwear be donned and doffed at the establishment, in which case it would be counted.

D. The SPHV, SCSI, or the FLS are to ensure that required gear such as earplugs and vinyl gloves to cover mesh gloves, to the maximum extent possible, are stored together in a convenient, central, and accessible location.

IV. MEETING WITH ESTABLISHMENT MANAGEMENT

A. Any time the SPHV, SCSI, or FLS plans to conduct a time measurement because working conditions have changed, he or she is to inform the establishment management at a weekly meeting.

B. The SPHV, SCSI, or FLS is to make the establishment aware of the time measurement procedures and advise that establishment personnel can observe the time measurement.

C. The SPHV, SCSI, or FLS is to document the discussion in a draft Memorandum of Interview (MOI). The draft MOI (See [FSIS PHIS Directive 5000.1](#), Verifying an Establishments Food Safety System) is to capture what was discussed as well as the date of the meeting and who was in attendance. The SPHV, SCSI, or FLS is to share a copy of the draft MOI with the establishment and then conduct any time measurements that are needed. Once the time measurements are completed and documented onto the MOI, the MOI can be finalized.

V. TIME MEASUREMENT FOR ON-LINE INSPECTION PERSONNEL

A. When a new measurement is necessary, the SPHV, SCSI, or FLS is to provide notice to a union representative of an opportunity to observe the measurement procedure.

B. The SPHV, SCSI or FLS is to go to the location where on-line slaughter inspectors normally perform donning and doffing of the Agency required gear listed above plus any establishment required gear. For example, if these items are usually stored in a locker, the SPHV, SCSI, or FLS is to go to the farthest locker.

C. The SPHV, SCSI, or FLS is to gather all articles that FSIS or establishment programs require on-line slaughter inspectors to don. In some situations, all articles may not be stored in one specific area. For example, cover gloves may be stored in a cabinet on the other side of the locker room. In all cases, the SPHV, SCSI, or FLS is to collect the gear in the donning and doffing area or, if not possible, in one location to ensure efficient donning and doffing procedures are followed. If on-line slaughter inspectors need to gather required gear, the SPHV, SCSI, or FLS is to measure separately the time needed to gather this gear and bring it to the place of donning. To do this the SPHV, SCSI, or FLS is to start at the point where the first article is collected and start the stop watch. The SPHV, SCSI, or FSIS is to gather all articles and proceed to the point of donning (e.g., the locker) and stop the watch. The SPHV, SCSI, or FLS is to record this time so it can be included in the cumulative time.

D. Conducting the Time Measurement Where the Livestock Slaughter Establishment Elects to Set-up the Inspection Station:

1. To begin the donning and walking measurement, the SPHV, SCSI, or FLS is to start the stop watch, open the locker (if articles are normally stored in a locker), and begin donning all the required gear at a customary pace. The SPHV, SCSI, or FLS is not to time the donning of each piece separately.

2. After donning the required gear, without stopping the stop watch, the SPHV, SCSI, or FLS is to walk to the farthest inspection station on the slaughter line by taking the normal route used by the on-line slaughter inspector in that establishment. Of note, if getting to the FSIS inspection station requires recurring delays, such as using an elevator or special washing required by the establishment, the SPHV, SCSI, or FLS is to include that time. After reaching the farthest inspection station, the SPHV, SCSI, or FLS is to stop the watch and document the time. The documented time will be the donning and walking time for that establishment.
3. After documenting the donning and walking time, the SPHV, SCSI, or FLS is to start the stop watch and return to where he or she donned. Also, where applicable, on the way back, the SPHV, SCSI, or FLS is to go where on-line slaughter inspectors wash required equipment so that the cleaning time for the required equipment only (e.g., a knife or cover glove, not an apron) is included. The SPHV, SCSI, or FLS is to then doff the required gear and place it in the locker, close the locker, stop the watch, and document this time. The documented time will be the doffing and walking time (with wash time as required).

E. Conducting the Time Measurement where Livestock Establishments Elect Not to Set-up the Inspection Station

1. To begin the donning and walking measurement, the SPHV, SCSI, or FLS is to follow the instructions in paragraph V. D. 1.
2. After donning the required gear and without stopping the stop watch, the SPHV, SCSI, or FLS is to collect the items needed to set up the inspection station and walk to the farthest inspection station on the slaughter line by taking the normal route used by the on-line slaughter inspector in that establishment. Of note, if getting to the FSIS inspection station requires recurring delays, such as using an elevator, the SPHV, SCSI, or FLS is to include that time. After reaching the farthest inspection station, the SPHV, SCSI, or FLS is to set up the inspection station then stop the watch and document the time. The documented time will be the donning and walking time for that establishment.
3. After documenting the donning and walking time, the SPHV, SCSI, or FLS is to follow the instructions in paragraph V. D. 3.

F. Conducting the Time Measurement at Poultry Slaughter Establishments

NOTE: Upon receipt of this directive, the SPHV, SCSI, or FLS is to conduct the activities listed below.

1. To begin the donning and walking measurement, the SPHV, SCSI, or FLS is to start the stop watch, open the locker (if articles are normally stored in a locker), and begin donning all the required gear at a normal pace. The SPHV, SCSI, or FLS is not to time the donning of each piece separately.
2. After donning the required gear and without stopping the stop watch, the SPHV, SCSI, or FLS will collect lot tally sheets needed for one station and walk to the farthest inspection station on the slaughter line by taking the normal route used by the on-line slaughter inspector in that establishment. Of note, if getting to the FSIS inspection station requires re-occurring delays, such as using an elevator or special washing required by the establishment, the SPHV, SCSI, or FLS is to include that time. After reaching the farthest inspection station, the SPHV, SCSI, or FLS is to place the lot tally

sheets in the proper location, stop the watch and document the time. The documented time will be the donning and walking time for that establishment.

3. After documenting the donning and walking time, the SPHV, SCSI, or FLS is to start the stop watch, retrieve the lot tally sheets, and return to where he or she donned. Also, where applicable, on the way back, the SPHV, SCSI, or FLS is to go where on-line slaughter inspectors wash required equipment so that the wash time for the required equipment only is included. The SPHV, SCSI, or FLS is to return the lot tally sheets to the applicable location, doff the required gear and place it in the locker, close the locker, stop the watch, and document this time. The documented time will be the doffing and walking time (with wash time as required).

G. Conducting the time measurement for Lunch Time Donning and Doffing

1. In most establishments during the lunch period, the employees return to the location at which they don at the beginning of the shift, and therefore the lunch time donning and doffing time would be one round trip of the donning and doffing process, excluding any time to gather articles.
2. However, in situations where the establishment has provided a donning and doffing location for the lunch period different than the location at which employees don and doff at the start and finish of a shift, a separate measurement will need to be taken.
 - a. The SPHV, SCSI, or FLS is to don all articles and walk to the farthest inspection station. He or she is to start the stop watch and walk to the location of donning and doffing. Once reaching the location, the SPHV, SCSI, or FLS is to doff the articles, include any necessary washing, stop the stop watch and document the time. Walk time after the doffing is not counted in the measurement.
 - b. The SPHV, SCSI, or FLS is to then start the stop watch, don articles, and walk to the farthest inspection station and, upon reaching the station, stop the watch and document the time. The documented time will be the cumulative time for the lunch period.

VI. CUMULATING TIME MEASUREMENTS

A. The SPHV, SCSI, or FLS is to add the time measured for gathering of articles to the total donning and walking time, as applicable. The three time components will be the cumulative donning, doffing, walking, and related activities time which consists of donning and walking time, time to gather articles (if applicable), and the doffing and walking time.

B. The daily donning, doffing, and walking time is comprised of:

1. One round trip of the donning and doffing process, which includes the time it takes to gather articles (if applicable), don the required gear (pick up lot tally sheets if applicable), walk to the farthest inspection station (set up the inspection station if applicable), walk back from the farthest inspection station (to include any necessary washing) to the area of donning and doffing (drop off lot tally sheets or items used to set up the inspection station if applicable), and finally doff the required gear; and
2. Donning and doffing time in relation to the lunch period

C. For administrative and scheduling purposes, the SPHV, SCSi, or FLS is to:

1. Add together the minutes and seconds from each component measurement in B. 1. above, and then round the cumulative total up or down to the closest minute (less than 30 seconds is rounded down; 30 seconds or more is rounded up),
2. Add together the minutes and seconds from each component measurement in B. 2. above, and then round the cumulative total up or down to the closest minute (less than 30 seconds is rounded down; 30 seconds or more is rounded up), and
3. Document the time for C. 1 and C. 2. separately in the Memorandum of Interview (see section IV. C.).

D. Typically, only one measurement will be taken, and there will be one cumulative donning, doffing, walking, and related activities time per establishment that applies to all shifts. When there are differences among shifts with the donning, doffing, and walking procedures, the SPHV, SCSi, or FLS is to measure and establish a cumulative donning, doffing, walking, and related activities time for each shift. Also, in establishments that slaughter both livestock and poultry, the SPHV, SCSi, or FLS is to conduct two separate cumulative donning, doffing, walking, and related activities times to account for the different species being slaughtered on any given day.

VII. DONNING TIME MEASUREMENT FOR OFF-LINE INSPECTION PERSONNEL

If the establishment elects not to request certain off-line verification procedures (e.g., pre-operational sanitation verification and ante-mortem inspection) to be conducted during overtime, a donning time measurement will need to be conducted (76 FR 33978). The SPHV, SCSi, or FLS is to conduct the donning time measurement by walking to the farthest department in which off-line verification procedures are conducted. The SPHV, SCSi, or FLS is to take the normal route used by the off-line slaughter inspector in that establishment.

VIII. DOCUMENTATION OF TIME MEASUREMENT

A. To finalize the draft MOI, the SPHV, SCSi, or FLS is to record:

1. All time components of the cumulative donning, doffing, walking, and related activities time;
2. The list of required gear; and
3. The cumulative time for lunch donning, doffing, walking, and related activities.

B. In addition, the SPHV, SCSi, or FLS is to include any time measurement and information they recorded for off-line verification in the MOI.

C. The SPHV, SCSi, or FLS is to provide a copy of the final MOI to establishment management (see section IV. C.), post a copy of it for all inspection personnel, and file a copy in the government office.

D. If at any time the establishment makes changes that would affect the donning, doffing, and walk time, the SPHV, SCSi, or FLS is to re-measure the time and submit a new MOI to the establishment management, post a copy of it for all inspection personnel, and file a copy in the government office.

IX. TIME FOR COMPLETING KNIFE SHARPENING

A. Knife sharpening is now part of the 8 hour work day. At establishments that offer a knife-sharpening service to FSIS employees, the SPHV, SCSI, or FLS is to ensure that all inspection program personnel are to use the service and not sharpen their own knives using a grinder or stone. Steeling the knife is not considered knife-sharpening for purposes of this paragraph. At establishments where a knife-sharpening service is not provided, inspectors who need to sharpen their own knives are provided the following amount of time:

1. In all beef slaughter operations, 15 minutes of knife-sharpening two times per week if they are on the slaughter line 4 or more days per week; or
2. 15 minutes of knife-sharpening one time per week if they are on the slaughter line 3 days or less per week; or if they work in any swine slaughter facility regardless of the number of slaughter days per week.

NOTE: If the establishment is providing knife sharpening services the SPHV, SCSI, or FLS is to document in the MOI (See Section IV), the procedure, provided by the establishment, that inspectors will follow.

B. In discussing the MOI with the establishment (see Section IV. C.), the SPHV, SCSI, or FLS is to provide the establishment the opportunity to decide how to structure knife sharpening time. The establishment may elect to include this time within its approved schedule or request overtime (see Section IV. D.). In addition, on a given day, if inspection program personnel are able to perform knife-sharpening during their scheduled tour of duty at establishments that do not provide knife sharpening services, the SPHV, SCSI, or FLS can assign knife sharpening duties. For example, an establishment may end production early or start late, thereby providing time during the shift to assign knife sharpening duties for this time period.

X. TIME FOR COMPLETING TIME AND ATTENDANCE (T&A) RECORD

A. As amended by the regulation, time necessary to conduct duties scheduled by FSIS is included in the 8-hour workday. FSIS has scheduled 1 minute per day for inspection program personnel to complete their T&A.

B. When possible, the SPHV, SCSI, or FLS is to ensure that the T&A is completed during any remaining time leftover in approved overtime or during any downtime.

C. In discussing the MOI with the establishment (see Section IV), the SPHV, SCSI, or FLS is to provide the establishment the opportunity to decide how to incorporate the 1 minute per day time for inspection program personnel to complete their T&A. The establishment may elect to include this time within their approved schedule or request overtime (see Section IV. D.).

XI. CONCERNS AND QUESTIONS

If inspectors have concerns regarding the list of required gear, the donning and doffing and walking procedures, the time documented on the posted MOI, or that the knife sharpening frequency may not be sufficient because of the age of the species inspected, inspection program personnel are to bring the question first to the attention of the immediate supervisor. If the immediate supervisor cannot answer the question, the inspector is to contact the FLS. The FLS will evaluate the issue, and if a re-measurement is needed, the FLS will work with the District Manager to have a second measurement conducted by a supervisor that did not conduct

the initial measurement. The FLS will evaluate all information, including any re-measurement or concerns relating to knife sharpening frequency, and discuss the final decision with the DM.

Compensation questions may be directed to the District Office or emailed to:
Don&DoffHelp@fsis.usda.gov.

A handwritten signature in black ink, reading "Rachel A. Edelstein". The signature is written in a cursive style with a large initial "R".

Assistant Administrator
Office of Policy and Program Development