Objectives

Upon completion of this module, you will be able to:

• Describe what a verification plan is, the purpose, and when a plan is developed.
• Describe the role of the EIAO in developing the verification plan.

FSIS Responsibility

• Verifying an establishment’s corrective measures following an NOIE or suspension is one of FSIS’ most important public health responsibilities.
Verification Plan

• Provides a systematic means for FSIS to ensure that an establishment is effectively carrying out its corrective actions regarding a NOIE or suspension.

Verification Plan

• Failure to carry out plan activities may:
  • Jeopardize public health because the establishment may be producing unsafe product
  • Negatively impact our ability to take further enforcement.
  • Impact the establishment’s “due process” in that FSIS may be keeping the enforcement action open for a prolonged period without justification.

Verification Plan

• Designed to verify that an establishment has fully implemented revisions and is effective in assuring regulatory compliance
• Assists the establishment to understand the importance of FSIS’ verification activities.
Contents

• Describes verification activities that will be performed by inspection personnel based on specific corrective actions provided by the establishment
• Provides the PHIS task associated with each verification activity that will be carried out by the inspection team
• Provides the regulatory citation associated with each verification activity

Example Verification Plan

<table>
<thead>
<tr>
<th>Plant Action</th>
<th>Reg. Citation</th>
<th>Task</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verify implementation of SSOP</td>
<td>416.13(b)</td>
<td>Preop/Op Sanitation</td>
</tr>
<tr>
<td>Verify calibration of process monitoring equipment</td>
<td>417.4(a)(2)(i)</td>
<td>RTE NSS HACCP</td>
</tr>
<tr>
<td>Verify actual temperatures recorded in chilling records</td>
<td>417.5(a)(3)</td>
<td>Poultry Slaughter</td>
</tr>
<tr>
<td>PIP Item</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Verify that the overheads have been refinshed at the end of 3 months.</td>
<td></td>
<td></td>
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</tbody>
</table>
When to Develop

• Verification plan should be developed whenever a decision is made to:
  • Defer enforcement after an NOIE has been issued
  • Hold a suspension in abeyance after the assignment of inspectors has been suspended
  • Consent agreement/verify provisions

Verification Plan

• The verification plan must be:
  • referenced in the deferral or abeyance letter
  • provided to the establishment as an enclosure to the deferral or abeyance letter

Preparing the Plan

• EIAO has primary responsibility
  • Include input from the FLS and the IPP team
  • Team approach ensures key issues are covered and proper work methods will be used to conduct verification activities
  • Additional time may be needed to prepare the plan
Verification Activities

- Procedures identified in the verification plan are performed as regularly scheduled PHIS procedures
- In-plant inspection team will verify the corrective actions as a part of the inspection procedure

Flexibility

- In-plant inspection team has the flexibility to increase the frequency of verification based on their findings
- Inspector generated procedures can also be performed if the establishment increases food safety monitoring and verification activities.

EIAO Follow-up

- The EIAO will:
  - Conduct follow-up at establishments at 30-, 60-, and 90-day intervals
  - Determine establishment compliance
    - For example, at the end of the deferral or abeyance period to determine if the action should be closed out
Establishments in Deferral or Abeyance

- Verification activities could reveal:
  - sufficient basis exists to close a deferral decision or suspension being held in abeyance
  - corrective measures are inadequate, and FSIS should suspend inspection, reinstate a suspension, or initiate proceedings to withdraw inspection
- EIAOs document this in a decision document to the DM or in letter to establishment

Workshop