

Verification Plans

EIAO Training



Objectives

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

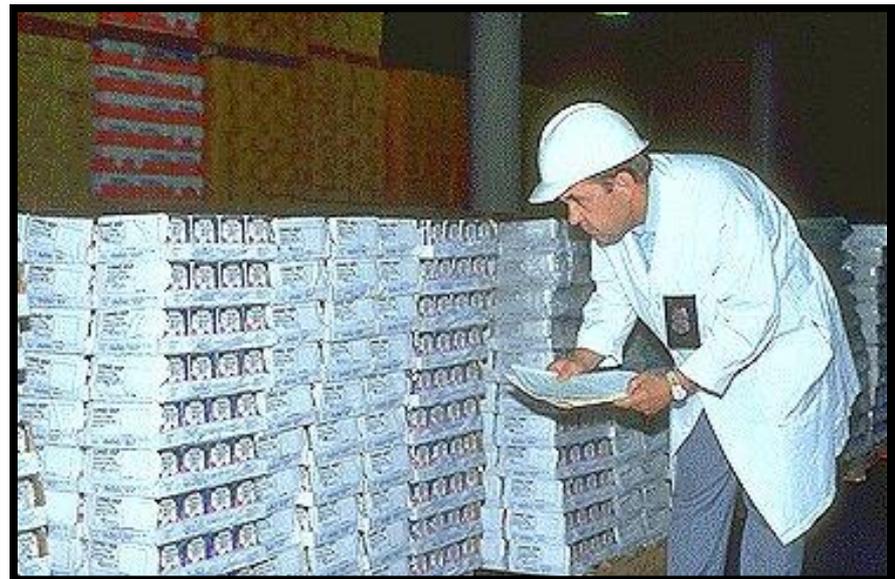
- Describe what a verification plan is, the purpose, and when a plan is developed.
- Describe the role of the EIAO in developing the verification plan.

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

Contents

- The EIAO also determines corrective actions proffered by the establishment that cannot be verified through regular PHIS procedures and lists them in the verification plan.
 - Example: plant improvement plans

Example Verification Plan

<u>Plant Action</u>	<u>Reg. Citation</u>	<u>Task</u>
Verify implementation of SSOP	416.13(b)	Preop/Op Sanitation
Verify calibration of process monitoring equipment	417.4(a)(2)(i)	RTE NSS HACCP
Verify actual temperatures recorded in chilling records	417.5(a)(3)	Poultry Slaughter

PIP Item

Verify that the overheads have been refinished at the end of 3 months.

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 that 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

