Public Health Information System: Headquarters Session

HACCP Verification
HACCP Implementation/HAV Procedures

- Routine and Directed Tasks
- FSIS Directive 5000.1
- Procedure Steps
- IPP consider the implications of their findings in the context of the Food Safety System
Verify effective implementation of the procedures set out in the **HACCP system**.

- Monitoring, verification, recordkeeping and corrective action HACCP regulatory requirements at all CCPs for a specific production
- Programs or measures continue to support decisions for hazards deemed NRLTO
Purpose of the HAV Procedure

- Verify compliance with regulations pertaining to the HACCP system:
  - Appropriate hazards considered and addressed
  - HA, HACCP plan, programs, supporting documents fit together to control hazards
  - Programs provide ongoing support for the HA
  - Evidence the system is implemented effectively to achieve the desired results
FSIS Expectations for HAV

- The HAV is not a FSA
- IPP will not be expected to make definitive judgments about adequacy of establishment decisions and supporting documents, except in obvious cases of noncompliance – this will remain EIAO work.
- IPP will be expected to communicate to supervisors or other personnel if they identify issues of concern in the HACCP system.
Scope of the HAV Procedure

During a single HAV procedure, IPP are to review all hazard analyses for all process categories in the establishment.
HAV Procedure Frequency

- Routine – quarterly
- Directed
  - Added in response to inspection findings, laboratory results or other information that requires follow-up activity
  - Initiated by HQ, DO, or supervisor
Directed HAV Example

- When a ground beef sample taken by FSIS is positive for *E. coli* O157:H7, IPP are to focus on aspects of the hazard analysis that address the control and prevention of *E. coli* O157:H7 while performing the resulting directed HAV.
FSIS has developed a series of practical steps to help inspectors approach the HAV and arrive at the appropriate conclusions.

These steps are in Directive 5000.1.
For NRLTO decisions, Programs/Docs?

**Step 2**
Flow chart

**Step 3**
For RLTO hazards, CCPs & HACCP Plan Support
417.2(c)(2) & 417.5(a)(2)

**Step 4**
For NRLTO decisions, Programs/Docs?

**Step 5**
Prerequisite Programs
417.5(a)(1)

**Step 6**
Other supporting documentation
417.4(a)

**Step 7**
Validation
417.4(a)(3)&(b), 417.3(b)

**Step 8**
Reassessment
417.4(a)(3)&(b), 417.3(b)

**Step 9**
Document results in PHIS
417.2(a)(1)&(2)

Hazard analysis
417.2(a)(1)&(2)

Hazard analysis
417.2(a)(1)&(2)

Hazard analysis
417.2(a)(1)&(2)

Hazard analysis
417.2(a)(1)&(2)

Hazard analysis
417.2(a)(1)&(2)

Hazard analysis
417.2(a)(1)&(2)
The Guide:

- Describes hazards traditionally associated with:
  - Particular types of products
  - Process Steps

- Is not only for agency personnel but also for establishments

- Is not all inclusive
Guide is not regulatory

- Assists with assessing whether the firm considered the appropriate hazards
- Use information and questions to gather information about specific process/procedures
Orientation to the Guide

- The Guide is divided into 4 sections
- Process Category Listing
- General Verification Questions
  - Has the establishment included this process step in the flow chart and hazard analysis?
Questions & Answers