USDA Food Safety and Inspection Service
U.S. DEPARTMENT OF AGRICULTURE

Assessment Strategies
EIAO Training

USDA/FSIS
Enforcement
Investigation
Analysis
Officer

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General Sanitation SPS/SSOP-Review:

- SSOP Regulations 9 CFR 416.11-416.17
- SPS Regulations 9 CFR 416.1-416.6
- Sanitation SOP must contain:
  - Daily procedures conducted both before and during operations to prevent direct contamination of product, or product contact surfaces.
  - Establishment implementing and performing at the frequencies stated in the plan.

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General Sanitation SPS/SSOP-Review:

- The establishment shall routinely evaluate and revise the Sanitation SOPs and procedures as necessary to keep them current.
- Corrective actions must be taken and documented when there is failure to prevent direct contamination of product or product contact surfaces. Remember DRIP
- Disposition, Restore, Prevent

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General Sanitation SPS/SSOP-Review:

- Establishment must document the monitoring of the SSOP & any corrective actions taken.
- Records made available to FSIS personnel upon request.
- Use FSIS Directive 5000.1 as guidance
- Answer questions from the General Tool and any additional questions contained in specific tools (i.e. Sanitary Dressing/RTE Sanitation).
  - Review appropriate records
  - Make direct observations

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Performing the Assessment

- The EIAO reviews and considers
  - Sanitation NRs
  - *Salmonella* Performance Standards results
  - Impact of SPS findings on food safety
  - Impact on the HACCP system
  - View entire operation
  - Determine if adequate level of sanitation is maintained to prevent product adulteration

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Performing the Assessment

- The EIAO will
  - Review SSOP design-assess the SSOP and its routine procedures are designed and implemented to prevent direct product contamination.
  - Analyze how the SSOP design and implementation impact the ability to support decisions in the Hazard Analysis and HACCP plan.
  - Observe SSOP implementation.
  - Randomly review 13 days of SSOP records from the last 60 production days.
  - Answer questions from tools.

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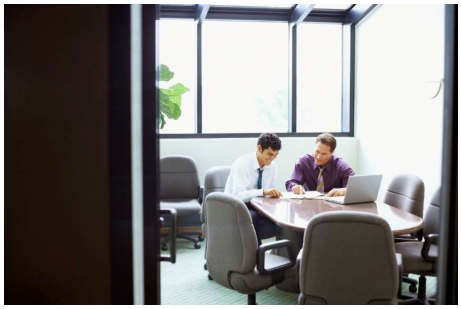
Performing the Assessment

- The EIAO should analyze the information collected relating to sanitation requirements and document a supportable agency position.



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General Tool – Dual Jurisdiction

- When establishments produce both FDA and FSIS regulated products, gather info about how establishments address production
- Directive 5730.1
- Assess how the food safety system prevents contamination of FSIS products from insanitary conditions in FDA areas, especially for RTE products

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Other Information - Recalls

- Recalls:
- 9 CFR 418.2-418.4
  - Establishment must notify FSIS within 24 hours if reason to believe adulterated product entered commerce
  - Establishment must maintain written procedures
- Directive 5000.8 Verifying Compliance with Requirements for Written Recall Procedures
- If EIAO determines noncompliance with 418-Work with Supervisor/FLS to get NR issued.

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Methods Group Exercise I

- A cattle slaughter plant has had multiple instances of rail dust contamination on carcasses in the cooler for the last 2 months.
- What would your regulatory & statutory thought process be for taking a possible enforcement action?

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