



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

A photograph of food preparation on a marble countertop. In the foreground, a white plate holds a pile of cubed raw meat. Behind it, a white cutting board is filled with skewers of meat, cherry tomatoes, and green and red peppers. A red and white plaid cloth is draped in the background. The entire image is overlaid with a dark green gradient on the right side.

# Verification Plans Condensed EIAO

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# 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

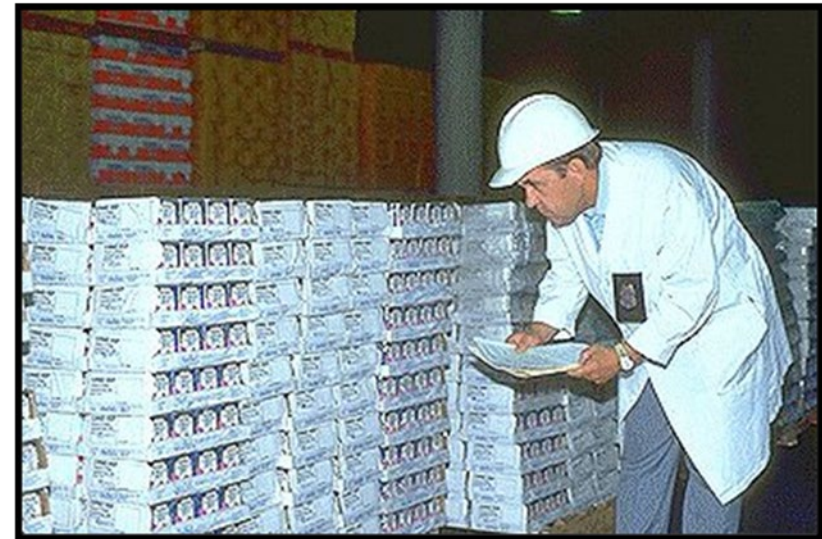
# FSIS Responsibility

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

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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

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- 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



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- The background that led to an enforcement action and deferral or abeyance of that action
- The organized list of the establishment's proposed corrective actions and preventive measures
- The documents, processes, products, or programs that are to be verified
- The directed PHIS task associated with each verification activity, the frequency the task is to be performed, and the regulations associated with the verification activity

# Contents

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- Free text space to record additional information as needed
- A statement to inform the establishment that the DO is to be informed of any changes to corrective actions and preventive measures during the verification period. The verification plan is to be revised before the establishment implements the changes



# Contents

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- 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

| Good Meats (Est. 1 M/P-1 Verification Plan<br>Implementation on February 10th, 2025)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                  |                                                                                                                               |                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Verification is defined as those activities, other than monitoring, that determine the validity of the food safety system and that these systems are operating in accordance to regulations. On January 22, 2025, <b>Good Meats</b> was issued a Notice of Intended Enforcement (NOIE) for failure to comply with 9 CFR parts 417. The verification plan is designed to verify the establishment has implemented controls to assure FSIS of future regulatory compliance. This verification plan (VP) identifies the proffered corrective actions, the relevant regulatory requirements, and timeframes for which FSIS officials will continue to verify implementation and effectiveness. FSIS inspection personnel will perform the following procedures on a scheduled or unscheduled basis.                                                                                                                                                                                                              |                                                                                                  |                                                                                                                               |                                                                                                                           |
| ESTABLISHMENT ACTION PLAN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 9 CFR Regulation                                                                                 | PHIS Inspection Tasks                                                                                                         | Frequency                                                                                                                 |
| <b><u>Heat Treated-Shelf Stable HACCP</u></b><br><br>1) Verify by direct observation and/or record review that the establishment performs the initial validation to support the placement of the water activity critical control point by monitoring water activity levels of mild pepperoni, hard salami, and natural genoa (small diameter, large diameter, natural product) after fermentation, heat treatment, and dry room release.<br><br>2) Verify the establishment is implementing the critical limit established at CCP 2B Water Activity (pH of $\leq 5.0$ with water activity of $\leq 0.97$ ) and is maintaining support for the water activity critical limit on file.<br><br>3) Verify by direct observation and/or record review that the establishment performs the initial validation to support the monitoring procedures for the water activity critical control point by monitoring each batch piece and one piece from each product truck from each cookhouse used after fermentation. | 417.5(a)(2)<br>417.4(a)<br><br><br>417.2(c)(3)<br>417.5(a)(2)<br><br><br>417.5(a)(2)<br>417.4(a) | Heat Treated-Shelf Stable HACCP<br><br><br><br>Heat Treated-Shelf Stable HACCP<br><br><br><br>Heat Treated-Shelf Stable HACCP | Upon implementation and weekly<br><br><br><br>Upon implementation and daily<br><br><br><br>Upon implementation and weekly |

# 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





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