



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



Verification Plans Condensed EIAO

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

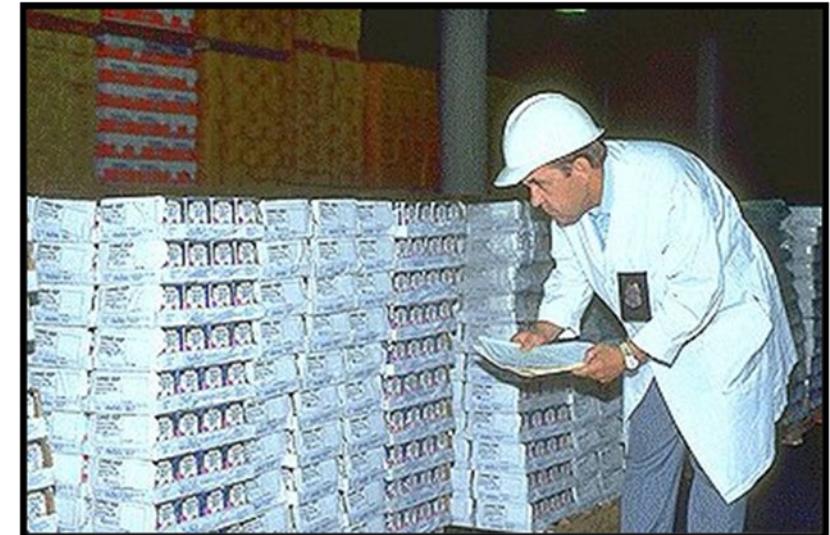
FSIS Responsibility

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

- 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

- 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

- 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 Implementation on February 10th, 2025			
ESTABLISHMENT ACTION PLAN	9 CFR Regulation	PHIS Inspection Tasks	Frequency
<u>Heat Treated-Shelf Stable HACCP</u>			
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.	417.5(a)(2) 417.4(a)	Heat Treated-Shelf Stable HACCP	Upon implementation and weekly
2) Verify the establishment is implementing the critical limit established at CCP 2B Water Activity (pH of ≤ 5.0 with water activity of ≤ 0.97) and is maintaining support for the water activity critical limit on file.	417.2(c)(3) 417.5(a)(2)	Heat Treated-Shelf Stable HACCP	Upon implementation and daily
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) 417.4(a)	Heat Treated-Shelf Stable HACCP	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



fsis.usda.gov

