

SOP: Protocol to create AER File for HH Allegations

This SOP provides direction to OFO personnel when a Humane Handling (HH) allegation is made by an individual or organization. OFO is to maintain documentation concerning the HH allegation in Assurance Net within an AER File.

1. Upon receipt of a humane handling allegation, the Humane Handling Enforcement Coordinator (HHEC) will communicate this information to the respective district office by email and include the documents sent.
2. The HHEC will request the DO to open an AER file specific to the allegation and complete an OFO investigation
3. Upon receipt of the email from HHEC, the DCS or DO designee will create an appropriate AER file.
4. Under the “**General**” tab,
 - a) In the “Reason for AER Initiation” Text box, enter the exact sentence: **Humane Handling Allegation from (name of person or organization making allegation)** for a livestock establishment and **Good Commercial Practices Allegation from (name of person or organization making allegation)** for a poultry establishment.
 - b) For the “Type of AER” select “Other” as the category.
5. Under the “**Evidence Collected**” tab, include the following documents, if applicable:
 - a) Allegation (letter or email as applicable)
 - b) Documentation from HHEC to district requesting AER file creation for HH allegation
 - c) Most recent HHVV or GCP Assessment report
 - d) Relevant HH documents – recent MOIs; NRs, etc.
 - e) Notification by Criminal Investigations Division within OIEA when case has been closed by CID or referred for further investigation
 - f) Documentation of the investigation and its results
6. If OFO investigation of HH allegation results in an Enforcement Action, a new AER file will be created following usual protocol, linking both cases together under the “Past/Related AER” tab.
7. Under the “**File Attachments**” tab,
 - a. Upload the letter by OPACE providing the official FSIS response to the HH allegation
 - b. In text box, identify uploaded file as official FSIS response to the HH allegation
8. District closes out file