

GAD Thought Process Job Aid

Instructions: Review this Job Aid and policy documents, regulations, and inspection methodologies with a mentor.

Acronyms/Definitions

- GAD – Gather, Assess, and Determine
- Public Health Information System (PHIS) – System used by IPP to document verification activities and findings.

Process Overview

- IPP use the GAD thought process when conducting inspection verification activities and when conditions in the establishment are observed that may be considered a vulnerability or rise to the level of noncompliance.
 - Gather all available information.
 - Assess the significance and meaning of the information gathered.
 - Determine whether the information supports a finding of regulatory compliance.

Basic Thought Process

- **Gather** all available information:
 - IPP review the regulations relevant to the verification activity
 - IPP review FSIS Directives relevant to the verification activity
 - IPP begin each verification task by collecting information that will help them determine whether the establishment is meeting the applicable regulatory requirements.
 - Review establishment programs and supporting documentation.
 - Review establishment records documenting implementation.
 - Observe establishment employees implementing the establishment's programs and procedures.
 - Observe conditions in the establishment.
 - Observe product and occasionally take measurements as specified in the establishment's programs.
- **Assess** the significance and meaning of the information gathered:
 - IPP consider what each piece of information, either taken separately or in conjunction with other findings, says about how the food safety system is functioning to ensure products are safe and wholesome in the context of the specific establishment, process, and products.
 - IPP consider information they gathered in the context of past findings and look for any patterns or trends in the findings.
 - IPP should consider the following questions during assessment:
 - Are conditions in the establishment getting worse over time?
 - Are the same or similar problems occurring repeatedly or consistently occurring on a seasonal basis?
 - Is the establishment responding effectively and in a timely manner to problems that arise?

- **Determine** whether the information supports a finding of regulatory compliance:
 - IPP decide, based on all the available information, whether one of the following findings emerge from the evidence:
 - The establishment is not maintaining sanitary conditions.
 - The establishment has produced or shipped adulterated products.
 - The establishment's food safety system is not effectively controlling the relevant food safety hazard(s).
 - The establishment is not meeting the requirements of one or more regulations.
 - IPP determine which regulation, based on the observations and context for that specific event, is not in compliance.
- If IPP are uncertain if their determination is supported by the information they gathered and assessed, they are to discuss the findings with their immediate supervisor.
- IPP consider each piece of information in the context of the food safety system.
 - Some pieces may not be sufficient to support noncompliance by themselves, but when considered together in the context of the food safety system, may indicate a systemic problem.
 - The following questions may assist IPP:
 - Is this piece of information part of a pattern?
 - Is there other information to indicate the system is working or not working?
 - Does the information seem to agree with the other available information about the food safety system?
 - Do these results support each other or is there an apparent contradiction?
- At the end of the GAD thought process, IPP are to document their findings in PHIS.

Discussion Points

- Discuss the three components of the GAD thought process and how they help IPP reach informed decisions regarding regulatory compliance.
- Discuss how IPP use the GAD thought process to conduct inspection verification activities.
- Discuss how no inspection decision is “automatic”, every observation needs to follow the GAD methodology to make supportable decisions.

Knowledge Check

- When do IPP utilize the GAD thought process?

Resources

- [FSIS Directive 5000.1](#) – *Verifying an Establishment's Food Safety System*