

HACCP Verification Task Job Aid

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

Acronyms/Definitions

- Food Safety System, a.k.a., Hazard Analysis and Critical Control Point (HACCP) system, includes:
 1. A flow chart describing all the steps in each process and product flow;
 2. The hazard analysis with its supporting documentation; and
 3. The HACCP plans (CCPs) the establishment implements to control food safety hazards identified as reasonably likely to occur (**RLTO**).
- Critical Control Point (CCP) – Point or step in a process at which control can be applied, and, as a result, a food safety hazard can be prevented, eliminated, or reduced to acceptable levels.
- Prerequisite Program (PRP) – Procedures the establishment implements to support decisions made in their hazard analysis that a potential food safety hazard is not reasonably likely to occur (**NRLTO**).
- Pre-shipment Review – A review of applicable PRP and CCP records, including corrective actions, associated with a specific production or establishment designated lot before it is shipped into commerce.
- HAV Task – Hazard Analysis Verification task

Task Overview

- IPP perform the HACCP Verification task to verify that the establishment **implements** its HACCP system in accordance with [9 CFR 417](#).
- IPP verify that establishments meet the monitoring, verification, recordkeeping, and corrective action regulatory requirements at **all CCPs** for a **specific production**. IPP also verify implementation of prerequisite programs and verify that the establishment completes pre-shipment review.
- IPP performs this task for the applicable HACCP process category as often as the tasks appear in the PHIS task list. The tasks are titled by process category (e.g., Slaughter HACCP Verification task, Fully Cooked-Not Shelf Stable HACCP Verification task, etc.).

Basic Procedure

- Schedule a HACCP Verification task in PHIS.
- Use recordkeeping, review and observation, or both components to verify that an establishment is effectively implementing the HACCP system by performing the following steps (FSIS [Directive 5000.1](#), Pt. II., Sec. III.):
 1. Select the product type and specific production.
 - Select a specific production of a product that the establishment is currently producing under the HACCP category.
 - **Note:** Verify all product types produced in the establishment over time.

2. Review the HACCP plan for the selected product type each time you perform the task.
 - Review the HACCP system to ensure full knowledge of its contents, including the flow chart, the hazard analysis, each CCP (including the monitoring and verification procedures), prerequisite programs, and reassessment records.
3. Verify the monitoring requirements per [9 CFR 417.2\(c\)\(4\)](#).
 - Review the HACCP plan to verify it includes CCP monitoring procedures and frequencies.
 - Observe the establishment monitor the CCP(s) to determine whether the establishment performs the procedures as written in the HACCP plan.
 - Review the monitoring records to determine if the establishment monitors the CCP at the frequency listed in the HACCP plan.
 - Occasionally perform monitoring procedures to verify that product meets the critical limit. Use the establishment's calibrated instrument for the monitoring activity. IPP are not to use their own device (e.g., thermometer).
4. Verify the verification requirements per [9 CFR 417.2\(c\)\(7\)](#) and [9 CFR 417.4\(a\)\(2\)](#).
 - Review each CCP to determine whether it lists the applicable ongoing verification procedures and frequencies for 1) **direct observation** of a) monitoring activities and b) corrective actions, 2) **records review**, and 3) process monitoring **equipment calibration**.
 - Observe the establishment perform the ongoing verification procedures to determine whether the establishment performs the procedures as written in the HACCP plan.
 - Review records to determine if the establishment performs verification procedures at the frequency specified in the HACCP plan.
5. Verify the recordkeeping requirements per [9 CFR 417.5\(a\)\(3\)](#).
 - Review the HACCP records to verify that the establishment documents the actual values and observations obtained during monitoring of the CCPs. This includes records documenting the:
 - Monitoring of the CCPs and their critical limits (including actual times, temperatures, or other quantifiable values).
 - Calibration of process monitoring instruments.
 - Corrective actions.
 - Verification procedures and results.
 - Product names, codes, lots, or other product identification.
 - Observe the establishment to verify record entries are made at the time the event occurs. Verify the employee who made the entry documents the date and time, and signs or initials the record per [9 CFR 417.5\(b\)](#).
 - For records entered and maintained on computers, verify the establishment has controls to ensure that each entry can be attributed to the particular employee making the entry and that an entry cannot be subsequently changed without a record of the change per [9 CFR 417.5\(d\)](#).

6. Verify implementation of prerequisite programs used to support that specific food safety hazards are NRLTO per [9 CFR 417.5\(a\)\(1\)](#).
 - Observe the establishment implementing the prerequisite program procedures to verify the establishment is implementing the programs as written.
 - Review any records generated by the program for the specific production.
 - Determine, based on observations and records, if the prerequisite program continues to support the decision that the relevant hazard is NRLTO.
7. Verify the corrective action requirements per [9 CFR 417.3](#).
 - Review the corrective action records associated with **the deviation from the CCP critical limit**. Observe the establishment perform corrective actions. Verify the corrective actions meet [9 CFR 417.3\(a\)](#), including 1) identify and eliminate the cause of the deviation; 2) reestablish control of the CCP; 3) prevent recurrence of the deviation; and 4) ensure that no adulterated product enters commerce.
 - Review the corrective action records associated with **deviations not covered by written corrective actions, or for some other unforeseen hazard**. Observe the establishment perform the corrective actions. Verify the corrective actions meet [9 CFR 417.3\(b\)](#), including 1) segregate and hold the affected product; 2) perform a review to determine the acceptability of the affected product; 3) take any necessary actions to ensure adulterated product does not enter commerce; and 4) reassess the HACCP plan.
8. Verify the pre-shipment review requirements per [9 CFR 417.5\(c\)](#).
 - Review pre-shipment review records for the selected product. Verify the establishment **dates** and **signs** the review.
 - Occasionally, observe the establishment conduct the pre-shipment review.
9. Consider the implications of any noncompliance.
 - Consider broader implications of inspection findings in the context of the establishment's food safety system, whether they indicate systemic or ongoing problems with the food safety system, and whether those problems could result in the establishment producing adulterated or misbranded products.
 - Immediately contact supervisor with concerns about systemic problems with the food safety system, or with concerns that adulterated product may have entered commerce.
 - Document any regulatory noncompliance in a noncompliance record. Take regulatory control action, if necessary.
 - Document the findings in PHIS.

Discussion Points

- IPP perform the **HACCP Verification task** to verify the **implementation** of the food safety system, while the **HAV task** is performed to verify the **support** and **design** of the food safety system as discussed in [FSIS Directive 5000.6](#).

- Discuss how IPP communicate with the establishment to observe establishment employees and obtain access to establishment records.

Knowledge Check

- Which directive provides IPP instructions on how to perform the HACCP Verification task?
- Which records are IPP to review when performing the HACCP Verification task?

Resources

- FSIS [Directive 5000.1](#) – *Verifying an Establishment's Food Safety System*
- FSIS [Directive 5000.1 Informational Dashboard](#)
- Additional HACCP Inspection Task instructions for:
 1. Raw Beef Processes: [FSIS Directive 10010.2](#) – *Verification Activities for STEC in Raw Beef Products*
 2. Lethality and Stabilization Processes: [FSIS Directive 7111.1](#) – *Verification Procedures for Lethality and Stabilization*
 3. Ready-to-Eat Processes: [FSIS Directive 10240.4](#) – *Listeria Rule Verification Activities*
- IM Workbook – HACCP Verification Task