

Pre-Operational SSOP Review & Observation Verification Task Job Aid

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

Acronyms/Definitions

- Pre-Op Sanitation SOP – Pre-Operational Sanitation Standard Operating Procedures
- Food Contact Surface (FCS) – Any surface that may come in direct contact with exposed meat or poultry product (e.g., conveyor belts, tabletops, saw blades, augers, stuffers, product totes, and knives).
- Non-Food Contact Surface (NFCS) – An area that does not contact product (e.g., sides of conveyor belts, table legs, floors, walls, drains, and ceilings).
- Regulatory Control Action (RCA) – An action commonly used by IPP to address specific problems IPP come upon when performing inspection (i.e., rejecting equipment) to prevent contamination or adulteration of product.

Task Overview

- The Sanitation SOP regulations, [9 CFR 416.11 through 416.17](#), require that establishments develop Sanitation SOPs to describe the specific procedures they will perform to **prevent direct contamination or adulteration of products**, including procedures that are **conducted prior to operations** (pre-op).
- IPP verify that the establishment implements the **pre-operational Sanitation SOP procedures** using two Pre-Op Sanitation SOP verification tasks:
 1. Pre-Op SSOP Record Review task – IPP review the Sanitation SOP and the daily pre-operational Sanitation SOP records to determine if the establishment is meeting the regulatory requirements (Record Keeping activity).
 2. Pre-Op SSOP Review and Observation task – “hands-on” pre-op sanitation verification: IPP observe the sanitary conditions in the establishment; watch establishment employees perform their pre-op Sanitation SOP monitoring procedures (both Record Keeping and Review and Observation activities).

Note: IPP perform each task approximately once per week in an establishment that operates 5 days a week. Performing the task includes both slaughter and processing operations, when available.

Basic Procedure

- Schedule a Pre-Op SSOP Review and Observation task.
- Review the establishment’s written pre-operational Sanitation SOPs.
 - **Note:** IPP’s primary role is to verify the establishment is implementing the written Sanitation SOPs, rather than to find every “dirty” surface.
- After the establishment management informs IPP that an area is ready for FSIS pre-op inspection, take a flashlight, pen, notepad, U.S. Rejected tags, and some means (e.g., tape, string) of affixing the tags to equipment, to perform the “hands-on” pre-op inspection.
- Perform lockout/tagout procedures in accordance with [FSIS Directive 4791.11](#) and have the establishment disassemble equipment for thorough inspection.

- **Note:** IPP not trained in lockout/tagout methodology cannot perform pre-op sanitation inspection on any equipment requiring lockout.
- Use a **risk-based approach** to select equipment or areas for inspection and to decide the extent of pre-op sanitation verification. Focus on food contact surfaces that present the highest risk to public health ([FSIS Directive 5000.4](#), Ch. II., Sec. II.). Factors that would indicate higher risk to public health:
 - Equipment that will contact exposed product;
 - Equipment that will contact RTE product post-lethality;
 - Equipment that is difficult to clean;
 - Equipment that FSIS has not verified recently;
 - Equipment/areas with a history of noncompliance; and
 - Testing results that suggest specific equipment may present a risk to public health.
- Observe establishment employees performing the pre-op monitoring procedures.
- Observe food contact surfaces and non-food contact surfaces. Visually examine the food contact surfaces for product residues. Food contact surfaces are to be organoleptically clean (look, feel, and smell clean; [FSIS Directive 5000.4](#), Ch. I., Sec. V., J.).
 - **Note:** Equipment such as a flashlight or step stool may be needed to observe inside or all parts of equipment.
- Review pre-op Sanitation SOP records. Compare inspection findings to what the establishment has documented.
 - **Note:** The establishment has until the beginning of the same shift of the next operating day to have the Sanitation SOP record available for IPP review.
- Determine if there is noncompliance with the **pre-op Sanitation SOP regulatory requirements**; document an NR when there is evidence of noncompliance with [9 CFR 416.13](#):
 - Establishment does not implement the pre-op procedures in the Sanitation SOPs prior to operations ([9 CFR 416.13\(a\)](#)).
 - IPP observe unclean food contact surfaces resulting from failure to adequately implement the pre-op Sanitation SOPs or because the pre-op Sanitation SOPs were ineffective ([9 CFR 416.13\(a\)](#)).
 - IPP observe unclean food contact surfaces resulting from the establishment's failure to restore sanitary conditions after establishment monitoring prior to beginning operations ([9 CFR 416.13\(a\)](#)).
 - Establishment does not monitor the implementation of the pre-op Sanitation SOPs at least daily ([9 CFR 416.13\(c\)](#)).
 - **Note:** Citing [416.13\(c\)](#) would indicate that monitoring is not performed daily or that the monitoring is not effective to identify failure to implement the written procedures. IPP observation of the establishment performing their monitoring activities is the ideal time to assess how the monitoring is performed and evaluate the effectiveness of the monitoring.

- When IPP observe **contaminated food contact surfaces** during the pre-op sanitation verification:
 - Take a RCA by placing a U.S. Rejected tag on the affected equipment.
 - Notify the establishment.
 - Document the noncompliance on an NR in PHIS ([FSIS Directive 5000.4](#), Ch. III., Sec. II., A.).
 - Verify the establishment **restores sanitary conditions** in accordance with [9 CFR 416.13](#) and evaluates the effectiveness of the Sanitation SOPs in accordance with [9 CFR 416.14](#).
 - Verify the establishment documents the restoration of sanitary conditions under [9 CFR 416.16\(a\)](#). Remove the U.S. Rejected tag only after the establishment has restored sanitary conditions.
- If regulatory noncompliance is found, consider whether the noncompliance is associated with previous noncompliances or other findings that did not result in a noncompliance, as they may indicate systemic problems in the establishment's food safety system.
- Consider findings in the context of the food safety system.
 - Note changes within the establishment facilities, equipment, etc., that would alter the **effectiveness** of the pre-operational Sanitation SOPs.
 - Consider if there are findings that may indicate the establishment is not maintaining effective Sanitation SOPs, such as:
 - A trend of pre-op noncompliance.
 - A trend of pre-op failures identified by the establishment.
- Document findings and complete task in PHIS.

Discussion Points

- Discuss how IPP use both the Record Keeping activity and the Review and Observation activity when performing Pre-Op SSOP Review and Observation task.

Knowledge Check

- What approach do IPP use when selecting equipment for pre-op sanitation inspection?

Resources

- [FSIS Directive 5000.1](#) – *Verifying an Establishment's Food Safety System*
- [FSIS Directive 5000.4](#) – *Performing the Pre-Operational Sanitation Standard Operating Procedures Verification Task*
- IM Workbook – Sanitation Standard Operating Procedures