

# SPS Verification Task Job Aid

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

## Acronyms/Definitions

- SPS – Sanitation Performance Standards
- Sanitation SOP – Sanitation Standard Operating Procedures
- HACCP – Hazard Analysis and Critical Control Point
- GAD – Gather, assess, determine
- Regulatory Control Action (RCA) – A regulatory action commonly taken by IPP to address specific problems described in [9 CFR 500.2](#) that IPP come upon when performing inspection (i.e., rejecting equipment) to prevent contamination or adulteration of product.
- 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, and stuffers).

## Task Overview

- IPP verify compliance with the SPS regulations [9 CFR 416.1 - 416.6](#). SPS focuses on the overall sanitary conditions in and around the official premises of the establishment (e.g., structure, pest control, adequate ventilation and lighting, plumbing systems).
- IPP verify regulatory compliance using “Review & Observation”, “Record Keeping” or “Both”, and enter the activity and findings in PHIS.

## Basic Procedure

- Schedule an SPS Verification task.
- Verify one or more of the SPS regulatory requirements in one or more areas of the establishment [FSIS Directive 5000.1](#) (Ch. II., Pt. II., Sec. I.).
  - Over the course of time, verify all SPS regulatory requirements (consider using a random number generator or similar to ensure selection of all regulations over time).
  - In general, verify compliance by **directly observing** the conditions in and around the establishment and observing establishment employees. IPP are also to review any applicable establishment records to verify that the establishment maintains sanitary conditions.
    - **Note:** Establishments are not required to maintain daily SPS records, but they are to maintain certain documents on file when required by the regulations (i.e., water potability certificate, documentation to demonstrate chemicals are safe and effective under the conditions of use, and sewage disposal letter for private sewage system).
- When IPP observe a condition that is less than perfect, start by assessing the significance of the observation in that specific establishment. The location, extent,

proximity to production, and other factors impact IPP's determination of compliance or noncompliance.

- When IPP gather, assess, and determine there is noncompliance with the SPS regulations, but **product or food contact surfaces are not directly contaminated**:
  - Take an RCA if there is an imminent probability that the noncompliance will result in product adulteration or contamination if not addressed immediately.
  - Immediately notify the establishment of the noncompliance (verbally and prior to documenting the NR).
  - Document noncompliance and cite the applicable SPS regulation [9 CFR 416.2 to 416.5](#), following the instructions in [FSIS Directive 5000.1](#) (Ch. II., Pt. II., Sec. II.).
    - **Note:** Clearly describe how the observations support the determination of noncompliance with the regulation(s) selected.
  - Cite [9 CFR 416.1](#) if an SPS noncompliance is due to the establishment's systemic or repetitive failure to maintain sanitary conditions and that product adulteration may occur as a result. Discuss this determination with your supervisor.
  - Verify the establishment takes necessary actions to return to compliance.
  - Consider whether findings are associated with past noncompliances or other findings that did not result in a noncompliance but which may indicate systemic problems (e.g., establishment findings and sampling results; [FSIS Directive 5000.1](#), Ch. V., Sec. VII.).
- If **product or a food contact surface is contaminated**, GAD further to determine the noncompliant regulation(s) and verify the establishment addresses the noncompliance by meeting the requirements of [9 CFR 416.15](#) or [417.3](#).
- Document findings and complete the task in PHIS.

### Discussion Points

- Discuss how IPP assess and determine if an observation is SPS noncompliance (e.g., an insanitary condition) versus a less-than-perfect condition that is not noncompliant, and how to document each.
- Discuss how IPP determine whether the SPS finding directly affects product or food contact surfaces.
- If IPP identify noncompliance, discuss how IPP determine which regulation(s) to cite.
- When voluntary and other reimbursable inspection services apply to the assignment, discuss key points in [FSIS Directive 12600.1](#).

### Knowledge Check

- When do IPP cite [9 CFR 416.1](#) for SPS noncompliance?

### Resources

- [FSIS Directive 5000.1](#) – *Verifying an Establishment's Food Safety System*
- IM Workbook – Sanitation Performance Standards (SPS)