

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

- Operational Sanitation SOP – 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, and stuffers, 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) – 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 or retaining product) 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**.
- IPP verify that the establishment implements the **operational Sanitation SOP procedures** using two Operational Sanitation SOP verification tasks:
 1. Operational SSOP Record Review task – review the Sanitation SOP and the daily operational Sanitation SOP records to determine if the establishment is meeting the regulatory requirements (Record Keeping activity).
 2. Operational SSOP Review and Observation task – “hands-on” operational sanitation verification to verify all Sanitation SOP regulatory requirements are met (both Record Keeping and Review and Observation activities).
- IPP perform **one** Operational SSOP task (Recordkeeping **or** Review and Observation) in every establishment every shift when amenable product is prepared or processed.
- IPP will verify that the establishment meets all Sanitation SOP regulatory requirements (monitoring ([9 CFR 416.13](#)), maintenance ([9 CFR 416.14](#)), corrective actions ([9 CFR 416.15](#)), recordkeeping ([9 CFR 416.16](#))).

Basic Procedure

- Schedule an Operational SSOP Review and Observation task.
- Review the establishment’s written operational Sanitation SOPs. Focus on verifying the establishment is implementing the written plan, versus identifying “clean/dirty.”
- Observe food contact surfaces, observe establishment employees, and review operational Sanitation SOP records to determine whether the establishment is implementing and monitoring their operational Sanitation SOPs effectively to **prevent contamination of food contact surfaces or adulteration of products during operations** ([FSIS Directive 5000.1](#), Ch. II., Pt. III., Sec. II.):

- Inspect one or more areas of the establishment to ensure procedures are effective in preventing direct contamination or other adulteration of product;
 - Observe establishment employees performing the **procedures** in the Sanitation SOPs.
 - Observe establishment employees performing the **monitoring** procedures;
 - Observe establishment employees implementing corrective actions; and
 - 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.
- Review the results of any sampling programs the establishment uses to monitor or assess the effectiveness of the Sanitation SOPs (e.g., microbial swabbing, ATP testing, etc.).
 - Assess the significance of findings in the context of the establishment's food safety system, operations, and process.
 - Determine if there is compliance with the **Sanitation SOP regulatory requirements** and document an NR when there is evidence of noncompliance, for example:
 - Establishment does not implement the operational procedures in the Sanitation SOPs at the specified frequencies ([9 CFR 416.13\(b\)](#)).
 - IPP observe unclean food contact surfaces or contamination of products resulting from failure to implement the Sanitation SOPs or because the Sanitation SOPs were not effective ([9 CFR 416.13\(b\)](#)).
 - Establishment employees do not monitor the implementation of the Sanitation SOPs at least daily ([9 CFR 416.13\(c\)](#)).
 - The establishment does not implement corrective actions when the Sanitation SOPs may have failed to prevent product contamination during operations ([9 CFR 416.15](#)).

Note: See [FSIS Directive 5000.1](#) (Ch. II., Pt. III.) for additional examples of noncompliance.
 - When IPP observe **contaminated food contact surfaces or contaminated product** during the operational sanitation verification:
 - Take a RCA by rejecting the affected equipment or retaining the affected product with U.S. Rejected/Retained tag(s).
 - Notify the establishment.
 - Document the noncompliance on an NR in PHIS. (**Note:** It is not required to also cite an SPS regulation for the same observation.)
 - Verify the establishment meets the corrective action requirement of [9 CFR 416.15](#) when the establishment's Sanitation SOP may have failed to prevent product contamination.
 - Remove the U.S. Rejected/Retained tag(s) only after the establishment has proposed corrective actions that **restore sanitary conditions**, ensure proper **product disposition**, and **prevent recurrence of direct contamination or adulteration of products** ([9 CFR 416.15](#)).

- 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 Sanitation SOPs.
 - Consider if there are findings that may indicate the establishment is not maintaining effective Sanitation SOPs, such as:
 - A trend of Sanitation SOP noncompliance.
 - A trend of Sanitation SOP failures identified by the establishment.
 - Sanitation SOP failures leading to the production of adulterated product.
- Document findings and complete task in PHIS.

Discussion Points

- Discuss the importance of reviewing the written Sanitation SOP before performing Sanitation SOP verification tasks.
- Discuss the role of IPP in verifying Sanitation SOPs.

Knowledge Check

- Establishments are required to develop and implement Sanitation SOPs that are effective at preventing the contamination of what?
- What corrective actions are the establishment required to take when either the establishment or FSIS determines that the Sanitation SOPs may have failed to prevent direct contamination or adulteration of product?

Resources

- [FSIS Directive 5000.1](#) – *Verifying an Establishment's Food Safety System*
- IM Workbook – Sanitation Standard Operating Procedures (SSOP)