

Review of Establishment Data Job Aid

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

Acronyms/Definitions

- NR – Noncompliance Record
- HACCP – Hazard Analysis and Critical Control Point
- MOI – Memorandum of Interview
- Indicator Organism – Microbial organisms such as generic *E. coli* or Aerobic Plate Counts (APCs) which slaughter establishments test for to monitor process control.
 - Swine and poultry (other than ratite) slaughter establishments are required by regulation to determine which microbial organisms will be effective in monitoring process control and to implement sampling plans to assess their process control ([9 CFR 310.18\(c\)](#) and [381.65\(g\)](#)).
 - Livestock (other than swine) and ratite slaughter establishments are required to test for generic *E. coli* ([9 CFR 310.25\(a\)](#) and [381.94\(a\)](#)).

Task Overview

- IPP perform the Review of Establishment Data task to review and access establishment records that may impact the establishment's hazard analysis. In general, IPP focus on records that they do not specifically review when conducting HACCP Verification or SSOP tasks.
 - For example, an establishment may conduct testing for a specific customer. The establishment may exclude this testing from its HACCP plan or Sanitation SOPs. However, if the testing could disclose the existence of an insanitary condition, the testing records need to be available to IPP for review.
- IPP consider this data in their assessment of the establishment's food safety system.
- IPP also review swine and poultry (other than ratite) slaughter establishment process control microbial sampling records during the Review of Establishment Data task ([FSIS Directive 5000.2](#)). IPP review livestock (other than swine) and ratite process control microbial (generic *E. coli*) sampling records during the Generic *E. coli* Verification task.

Basic Procedure

- Schedule the Review of Establishment Data task in PHIS.
- Be aware of any testing the establishment performs.
 - Ask the establishment about any testing it performs, including testing for specific customers or testing that is not mentioned in the HACCP plan or Sanitation SOPs.
 - Determine if that data may have an impact on the hazard analysis or if that data could disclose the existence of an insanitary condition.
 - If the data may have an impact on the hazard analysis or could disclose the existence of an insanitary condition, ask the establishment to make the data available for IPP review.

- Review the establishment data, seeking answers to questions such as:
 - Is there documentation that supports the testing frequency?
 - Do the results support the decision-making and effectiveness of a prerequisite program?
 - At what point in the process does the testing occur?
 - Does the establishment use the test results in a manner that checks the proper execution of the point in the process where testing occurs?
 - Do results indicate that a food safety concern may be developing (e.g., increase in pathogen or indicator organism positive results)?
 - If so, is the establishment reacting to results?
 - Do results indicate a potential food safety concern is decreasing (e.g., decrease in pathogen or indicator positive results)?
 - If so, does the establishment plan to reduce testing frequencies? How do they support the reduced frequency?
 - Are there operational results that correlate with testing results (e.g., failure to perform some procedures in the Sanitation SOPs occurring at the same time as an increase in positive *Listeria* test results)?
 - **Note:** The purpose of these questions is to help IPP understand the food safety system and results. A negative response does not automatically mean there is noncompliance.
- Review the swine or poultry (other than ratite) slaughter establishment's process control microbial (e.g., generic *E. coli*, APCs) sampling data.
 - Look for trends in the data, such as sampling results that:
 - Exceed the establishment's normal variation or upper control limit by a large amount several times in quick succession.
 - Begin to regularly exceed the establishment's normal variation or upper control limit by a small amount.
 - Show a trend of rising values over a relatively long period of time.
 - **Note:** Also consider other microbial sampling results from downstream products (e.g., testing of parts for *Salmonella*) to determine if other sampling plans show significantly worse results. This may indicate that increased contamination is occurring during slaughter.
 - Results by themselves, even those showing a negative trend, do not necessarily indicate noncompliance. IPP:
 - Verify the establishment takes effective action to maintain or restore process control.
 - Consider the sampling results along with other findings about the establishment's slaughter process to determine compliance.
 - Discuss findings that indicate the establishment is not maintaining sanitary conditions throughout the slaughter HACCP system with FSIS supervisors.
- Raise any questions regarding the data or test results at the weekly meeting with the establishment.

- Document the establishment data records review and discussion with establishment in the weekly meeting MOI, including:
 - What test results IPP reviewed and for what time period.
 - Specific concerns IPP discussed with the establishment.
 - How the establishment responded.
- IPP are to discuss concerns about establishment data/test results and how an establishment responds to the results with their supervisor. Trends in positive test results may indicate systemic problems with the HACCP system, even if noncompliance has not yet occurred ([FSIS Directive 5000.1](#), Ch. V., Sec. VII., F.).
- Complete the inspection task in PHIS.

Discussion Points

- Discuss how repeated positive test results from establishment testing may indicate a trend, even if a noncompliance has not yet occurred.
- Discuss examples of trends IPP are to look for when reviewing a slaughter establishment's process control microbial (e.g., generic *E. coli*, APCs) test results.

Knowledge Check

- How are IPP to document their findings (e.g., test results they reviewed, specific concerns, establishment response) from the Review of Establishment Data task?

Resources

- [FSIS Directive 5000.1](#) – *Verifying an Establishment's Food Safety System*
- [FSIS Directive 5000.2](#) – *Review of Establishment Data by Inspection Personnel*
- IM Workbook – Review of Establishment Data
- Guidelines: Developing Microbiological Sampling Programs in [Swine Slaughter](#) and [Poultry Slaughter](#) Establishments