IM OJT Knowledge Check Answer Key

Beef Sanitary Dressing Verification Task Job Aid

Question: Explain why effective sanitary dressing and process control procedures are important during beef slaughter.

Answer: Effective sanitary dressing and process control procedures underpin the critical control points that an establishment has in place to prevent, eliminate, or reduce to an acceptable level food safety hazards that are reasonably likely to occur in the slaughter process and that support the HACCP system, as a whole, is functioning as intended (FSIS Directive 6410.1). Sanitary dressing and process control procedures prevent carcass contamination that could reduce the effectiveness of the CCP.

Big 9 Formulation Verification Task Job Aid

Question: What are the "Big 9" allergens?

Answer: The "Big 9" food allergens account for approximately 90 percent of all food allergy reactions. They are crustacean shellfish (e.g., crab, lobster, shrimp), eggs, fish, peanuts, milk, tree nuts (e.g., almonds, pecans, walnuts), soybeans, sesame and wheat (FSIS Directive 7230.1).

Question: What makes an RTE product eligible for the Allergen Sampling Verification Program?

Answer: Product is eligible for the Allergen Sampling Verification Program when the product is produced at an establishment that is eligible for the "Big 9" Formulation Verification task, is an RTE product, and is a product that is labeled with a negative claim for one or more allergen ingredients (e.g., no soy added, milk-free, does not contain eggs).

Conduct a Weekly Meeting Job Aid

Question: What type of document do IPP use to record weekly meeting discussions and other important information shared with establishment management?

Answer: The FSIS employee who attends the weekly meeting is to take notes of the meeting and is to document those notes in a Memorandum of Interview (MOI) within the Meeting with Establishment Management PHIS task (FSIS Directive 5010.1).

Corrective Actions Job Aid

Question: What type of HACCP failure requires the establishment to perform a reassessment of the HACCP plan as part of their corrective actions?

Answer: The establishment is to implement corrective actions, to include performing a reassessment, when a deviation that is not covered by written corrective actions or some other unforeseen hazard occurs (9 CFR 417.3(b); FSIS Directive 5000.1).

Question: Which corrective action requirements of 9 CFR 416.15 do not apply when IPP observe contaminated food contact surfaces before operations begin and **no product is involved**?

Answer: When IPP or establishment employees observe contaminated food contact surfaces before operations, the establishment is not required to perform all of the corrective actions as per 9 CFR 416.15 because the contaminated surface has not affected product. The establishment is not required to implement preventative measures or ensure product disposition as long as no product has become contaminated. The establishment is still required to restore sanitary conditions prior to beginning operations (FSIS Directive 5000.1).

Discuss Current Trends Job Aid

Question: Why do IPP evaluate noncompliance records and other related findings for trends?

Answer: IPP are to evaluate NRs and other findings for trends because trends may indicate systemic problems with the food safety system, and IPP are to document trends and discuss trends with their FSIS supervisor and the establishment (FSIS Directive 5000.1). The frontline supervisor (FLS) supports IPP in assessing the significance of the findings and associations. The FLS notifies the District Office (DO) when they determine the findings indicate there is an immediate food safety concern, ongoing noncompliance, or systemic problems with the food safety system. The FLS and DO determine whether further enforcement action is warranted.

Document a Noncompliance Record Job Aid

Question: Describe what IPP are to include in the description of a noncompliance.

Answer: IPP are to include a description of each noncompliance in clear, concise terms, including the problem, time of occurrence, location, and effect on the product, if any. The description should clearly explain how IPP's findings support the determination that the establishment did not meet regulatory requirements. The description should explain how IPP notified establishment management of the noncompliance. If there is a developing trend of noncompliance, IPP are to include in the description block: the number of the associated NR; a description of how the NR is associated; any unsuccessful further planned actions taken by the establishment to address the noncompliances (FSIS Directive 5000.1).

Export Certification Task Job Aid

Question: Where do IPP find the requirements for products to be exported to a foreign country?

Answer: Additional export requirements that have been officially communicated to FSIS by the importing country can be accessed in the FSIS Export Library, which is available on the FSIS website (FSIS Directive 9000.1).

Question: Which part of the paper FSIS Form 9060-5 is kept and filed in the FSIS files with a copy of FSIS Form 9060-6?

Answer: IPP maintain the triplicate copy of the export certificate and a copy of all signed supplemental or other supporting documents for the government file (FSIS Directive 9000.1).

Food Defense Verification Task Job Aid

Question: How do IPP document vulnerabilities observed during a Food Defense Verification task when there is no evidence of product adulteration?

Answer: IPP are to document vulnerabilities in a Food Defense MOI when there is no evidence of product adulteration (FSIS Directive 5420.1).

Question: Are establishments required by regulation to have a functional food defense plan?

Answer: Functional food defense plans are voluntary in official FSIS regulated establishments. FSIS encourages establishments to adopt a functional food defense plan (FSIS Directive 5420.1).

GAD Thought Process Job Aid

Question: When do IPP utilize the GAD thought process?

Answer: IPP use the GAD thought process when conducting inspection verification activities (FSIS Directive 5000.1).

Generic *E. coli* Verification Task Job Aid

Question: What are IPP to do if an establishment's generic *E. coli* test results indicate a failure of process control?

Answer: IPP are to verify the establishment's sanitary dressing procedures and that the establishment takes necessary actions to reestablish control (FSIS Directive 5000.1).

Question: Are IPP to perform the Generic *E. coli* Verification task in establishments that slaughter swine or poultry in the greatest number?

Answer: No. The Generic *E. coli* Verification task applies at establishments that slaughter cattle or ratites in the greatest number (FSIS Directive 5000.1). In establishments that slaughter swine or poultry in the greatest number, IPP follow instructions in FSIS Directives 6410.4 and 6420.5 for scheduling the appropriate inspection task (Operational SSOP task or Slaughter HACCP verification task) to verify the establishment's microbiological sampling to assess process control.

HACCP Job Aid

Question: When conducting a hazard analysis, if the establishment determines that a hazard is reasonably likely to occur (RLTO), what are they required to develop to address the hazard?

Answer: IPP verify the establishment has at least one critical control point for each hazard that is identified as being RLTO in the process (FSIS Directive 5000.6).

Question: When conducting a hazard analysis, if the establishment determines a hazard is not reasonably likely to occur (NRLTO), what are they required to provide for this decision?

Answer: IPP verify the establishment has support for any decision that applicable hazards are NRLTO (FSIS Directive 5000.6). If certain steps in the hazard analysis do not identify any hazards, the establishment is not required to list a justification statement for their decision; however, IPP may question any determination in the hazard analysis if, for example, historically a food safety hazard can occur, or new information becomes available regarding a particular process having a potential food safety hazard.

HACCP Verification Task Job Aid

Question: Which directive provides IPP instructions on how to perform the HACCP Verification task?

Answer: FSIS Directive 5000.1 provides IPP instructions on performing the HACCP Verification task. Additional instructions specific to certain types of products and processes are found in other directives, such as FSIS Directive 10010.2 (raw beef processes), FSIS Directive 7111.1 (for processes with lethality and stabilization) and FSIS Directive 10240.4 (ready-to-eat processes).

Question: Which records are IPP to review when performing the HACCP Verification task?

Answer: When they verify HACCP implementation, IPP review establishment HACCP records for the selected production that document the monitoring of CCPs and critical limits; verification procedures and frequencies; and corrective actions. IPP are also to review records generated by prerequisite programs or other control measures the establishment uses to support decisions in the hazard analysis for the specific production selected. IPP also review establishment pre-shipment review records for the selected production. **Note:** Before performing a HACCP Verification task, IPP are to review the relevant HACCP plan to ensure they have full knowledge of its contents and be familiar with any prerequisite programs or other control measures. (FSIS Directive 5000.1).

KIS™ Testing Job Aid

Question: What is the purpose of the Kidney Inhibition Swab (KIS™) testing in livestock?

Answer: The KIS™ test is an in-plant screening test for antimicrobial drug residues. The Public Health Veterinarian (PHV) or inspection personnel under the direction of a PHV conduct KIS™ tests on livestock carcasses that, based on herd history or ante-mortem or post-mortem inspection findings, may contain a violative drug residue (FSIS Directive 10800.1).

Question: How do IPP determine the result of the KIS™ test?

Answer: IPP interpret the KIS™ test results using the KIS™ test instructions. IPP compare the agar color to the interpretation card provided with the test kit under cool white fluorescent light. Yellow or yellow/green colors are negative. Blue/purple colors are positive. Yellow or yellow/green in the lower half of the vial with blue/purple or brown in the upper half of the vial are interpreted as negative since there is not a consistent blue/purple color throughout the tube.

The negative control must be yellow for the results to be considered valid (FSIS Directive 10800.2).

Listeria Rule Verification Activities Job Aid

Question: What could a trend of *Listeria* spp. positive test results indicate in an establishment that produces post-lethality exposed ready-to-eat product?

Answer: A trend of *Listeria* spp. positive test results could indicate the establishment's *Listeria* control program is not effective in controlling the presence of *Lm* in the establishment's post-lethality processing environment (FSIS Directive 10240.4).

Livestock Ante-Mortem Inspection Job Aid

Question: What are the CSIs to do if they observe any livestock with abnormalities or signs of disease during ante-mortem inspection?

Answer: IPP are to request that the establishment personnel segregate, in a humane manner, livestock that need further examination by the PHV from livestock that have passed ante-mortem inspection (FSIS Directive 6100.1).

Livestock Humane Handling Verification Task Job Aid

Question: If IPP observe egregious inhumane slaughter or handling, what is the **first** thing they do to prevent the inhumane handling or slaughter from continuing?

Answer: IPP are to take a regulatory control action to immediately stop the inhumane slaughter or handling of livestock that is of an egregious nature (FSIS Directive 6900.2).

Livestock Post-Mortem Job Aid

Question: Give examples of conditions or lesions IPP retain for PHV disposition.

Answer: General conditions or lesions that warrant retention of carcasses for PHV disposition include those carcasses and parts with lesions or conditions that might render the meat unfit for human consumption. These include: carcasses of animals designated as U.S. Suspects at ante-mortem inspection; carcasses of animals that contain lesions consistent with tuberculosis; carcasses that display disease conditions or herd history that warrant residue testing; carcasses that display signs of disease conditions at post-mortem examination that could reasonable result in condemnation or restriction (FSIS Directive 6100.2).

Livestock Zero Tolerance Verification Task Job Aid

Question: What are the zero tolerance contaminants in livestock slaughter?

Answer: No visible fecal material, milk, or ingesta on livestock carcasses at or immediately after the final rail and no feces, ingesta, or milk present on head, cheek, and weasand meat at packing (FSIS Directive 6420.2).

National Residue Program Sampling Job Aid

Question: What tissues do IPP collect and how much of each for the NRP sample?

Answer: IPP collect muscle (2 lb.), liver (1 lb.), and kidney (1 lb.) from cattle and swine carcasses; muscle (2 lb.), liver (1 lb.), and both kidneys from sheep and goat carcasses; muscle (2 lb.) and livers/kidneys from 6 poultry carcasses; and liver (1 lb.) from roaster pigs (FSIS Directive 10800.2).

Question: When do IPP select the specific carcass for the NRP sample?

Answer: IPP select from all animals that have passed ante-mortem inspection on the day designated for scheduled sampling. IPP randomly select carcasses at the kill floor stage, regardless of post-mortem disposition (FSIS Directive 10800.2).

NFSCP Verification Tasks Job Aid

Question: Do IPP determine non-food safety noncompliance based on individual units of product?

Answer: IPP are to determine whether product complies with the regulations based on production lots of process controls rather than on individual units of product (FSIS Directive 7000.1).

Operational SSOP Review & Observation Verification Task Job Aid

Question: Establishments are required to develop and implement Sanitation SOPs that are effective at preventing the contamination of what?

Answer: Establishments are required to develop, implement, monitor, and adjust as necessary the Sanitation SOPs to ensure they are effective at preventing contamination or adulteration of product (FSIS Directive 5000.1).

Question: 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?

Answer: When IPP or the establishment find that the Sanitation SOPs may have failed to prevent direct contamination of products, IPP are to verify the establishment's compliance with the 9 CFR 416.15 corrective action requirements. Corrective actions include procedures to ensure appropriate disposition of product(s) that may be contaminated, restore sanitary conditions, and prevent the recurrence of direct contamination or adulteration of product(s) (FSIS Directive 5000.1).

Other Inspection Requirements Task Job Aid

Question: Is the establishment required to maintain written recall procedures?

Answer: Yes, the establishment is required to maintain written recall procedures (FSIS Directive 5000.8).

Question: Under what circumstances may IPP perform reinspection of product?

Answer: IPP may reinspect products as often as necessary to determine the products are not adulterated or misbranded (9 CFR 318.2 and 381.145).

PHIS Job Aid

Question: What resources are available to IPP when they need assistance with PHIS?

Answer: IPP resources for PHIS assistance include PHIS Help, the FSIS PHIS webpage, the FSIS PHIS Components webpage, and their supervisor (FSIS Directive 13000.7).

Poultry Ante-Mortem Job Aid

Question: Who does the IIC notify if they suspect that birds are affected with a reportable or foreign animal disease?

Answer: IPP are to notify their supervisor and the District Office, through their chain of command, as soon as possible when they suspect that any undiagnosed or unusual disease condition is reportable, foreign, or both (FSIS Directive 6000.1).

Poultry Good Commercial Practices (GCP) Verification Task Job Aid

Question: When performing a Poultry GCP Verification task, where do IPP make observations of the establishment's GCP?

Answer: IPP are to visit areas from receiving or holding through pre-scald to observe whether establishment employees are mistreating birds or handling them in a way that will cause death or injury or will prevent thorough bleeding or result in excessive bruising (FSIS Directive 6110.1).

Question: How frequently do IPP review establishment records documenting the establishment's adherence to poultry GCP?

Answer: Once a week, IPP review establishment records, when available, documenting adherence to poultry GCP, randomly selecting the day of the week on which to perform the review (FSIS Directive 6110.1).

Poultry Post-Mortem Job Aid

Question: What poultry post-mortem conditions may warrant condemnation?

Answer: Examples of poultry post-mortem conditions that warrant condemnation include septicemia, toxemia, and diseases or conditions that have resulted in systemic or generalized changes to the carcass (e.g., metastatic neoplasia). Additional diseases and conditions that

warrant condemnation (e.g., cadavers) are described in FSIS Directive 6100.3 and 9 CFR 381 subpart K.

Poultry Zero Tolerance Verification Task Job Aid

Question: What is the zero tolerance contaminant in poultry slaughter?

Answer: IPP verify the establishment's HACCP system is preventing carcasses contaminated with feces from entering the chilling system (FSIS Directive 6420.5).

Question: How many poultry carcasses do IPP examine during each fecal contamination check?

Answer: Each fecal contamination check by IPP consists of selecting and examining 10 poultry carcasses after the final wash and before the chilling tank (FSIS Directive 6420.5).

Pre-Operational SSOP Review & Observation Verification Task Job Aid

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

Answer: IPP look at selected pieces of equipment using a risk-based approach to selecting equipment and areas to examine on pre-op. IPP gather information to assist them in selecting equipment, focusing on equipment that presents the highest risk to public health (e.g., equipment that will contact exposed product, that is difficult to clean, that has a history of noncompliance). When large numbers of simple equipment (e.g., pans, trays) are available, IPP select a representative sample of this type of equipment, rather than looking at all of the equipment (FSIS Directive 5000.4).

Raw Beef Sampling Job Aid

Question: Explain what it means to use "aseptic technique" to collect a sample.

Answer: IPP use aseptic technique when collecting samples. Aseptic technique is a method used to prevent contamination of the sample (e.g., proper gloving technique, not allowing buffer tubes to touch the inside of the sample bag, using a sanitized hook and knife, etc.) (FSIS Directive 10010.1).

Question: Discuss the significance of a trend of STEC positive results.

Answer: A trend of STEC positive results may indicate the establishment is not maintaining process control (FSIS Directive 10010.2).

Raw Poultry Sampling Job Aid

Question: FSIS uses a moving window approach to assess whether establishments meet performance standards for what pathogen?

Answer: *Salmonella* (FSIS Directive 10250.2).

Regulatory Control Action Job Aid

Question: What is a regulatory control action (RCA)?

Answer: A RCA is a limited focus action used by IPP to address specific problems that IPP come upon in the course of performing their verification tasks (FSIS Directive 5000.1). A RCA prevents the movement of the product or use of the equipment or facility involved until the noncompliance has been corrected.

Question: When are IPP to take a RCA?

Answer: Examples of when IPP may take a RCA include: direct product contamination; economically adulterated product; insanitary conditions or practices; conditions that preclude IPP from determining that product is not adulterated or misbranded; inhumane handling or slaughtering of livestock (FSIS Directive 5000.1).

Question: List a few examples of RCAs.

Answer: Examples of RCAs include tagging of product, equipment, or facilities and slowing or stopping a line (FSIS Directive 5000.1).

Review of Establishment Data Verification Task Job Aid

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

Answer: IPP are to document each week in the weekly meeting memorandum of interview (MOI) that they conducted the records review, and that they discussed, if indicated, any concerns with the establishment at the weekly meeting (FSIS Directive 5000.2).

RTE Sampling Job Aid

Question: What RTE products are eligible under the RTEPROD sampling program?

Answer: All RTE meat and poultry products, including both post-lethality exposed and not post-lethality exposed products, are subject to RTEPROD sampling except: pass-through product (fully packaged finished product received and kept in its package without exposure, processing or repackaging); oils, shortening, lard, margarine, oleomargarine, or mixtures of rendered animal fats; product labeled “for further processing” in which the product will receive a lethality treatment at another federally inspected establishment (FSIS Directive 10240.3).

Question: What size sample do IPP collect under RTEPROD sampling?

Answer: IPP collect one pound of RTE product for RTEPROD sampling. IPP are to collect either one pound of meat or poultry only or one pound of a complete product, including meat or poultry and non-meat or poultry components when the ingredients are commingled (FSIS Directive 10240.3).

Question: What are IPP to do if the establishment does not hold product that IPP sampled, pending FSIS test results?

Answer: IPP are to issue an NR and immediately contact the district office through the supervisory chain of command (FSIS Directive 10240.3).

SPS Verification Task Job Aid

Question: When do IPP cite 9 CFR 416.1 for SPS noncompliance?

Answer: IPP are to cite 9 CFR 416.1 in situations where findings indicate that an establishment systematically fails to maintain sanitary conditions, and that product adulteration may occur as a result. When considering whether to cite 9 CFR 416.1, consider whether findings support that the establishment has systematically failed to maintain the facility in a sanitary manner (FSIS Directive 5000.1).

SPS vs Sanitation SOP vs HACCP Job Aid

Question: IPP observe condensation dripping from an insanitary overhead surface onto raw product. What type of noncompliance would this likely be, if there are no food safety hazards involved?

Answer: IPP are to gather-assess-determine in situations where they find noncompliance to determine which regulation(s) are noncompliant. When IPP find product is contaminated, IPP are to first determine if this event has a food safety impact, is the result of a problem with the Sanitation SOP, or is the result of a problem under sanitary dressing procedures in slaughter operations. In this example, if the condensation has directly contaminated product, but the establishment supports that it has not resulted in a food safety hazard, IPP would likely document this as a Sanitation SOP noncompliance (FSIS Directive 5000.1).

SRM Control Verification Task Job Aid

Question: What are specified risk materials (SRMs) in cattle of all ages?

Answer: The distal ileum of the small intestine and the tonsils (9 CFR 310.22(a)).

Question: What are SRMs in cattle that are 30 months of age and older?

Answer: The brain, skull, eyes, trigeminal ganglia, spinal cord, vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum), and dorsal root ganglia (9 CFR 310.22(a)).

TB Surveillance Sampling Job Aid

Question: What type of lesions do IPP retain for the PHV to submit to NVSL for tuberculosis (TB) surveillance?

Answer: IPP retain carcasses of animals that contain lesions consistent with tuberculosis. This includes all head and thoracic granulomas where TB lesions are most common, and any other granulomatous lesions suggestive of TB regardless of anatomical location (FSIS Directive 6240.1).

Verifying Procedures to Prevent Contamination in Poultry Slaughter Establishments Job Aid

Question: What inspection task do IPP use to document verification of a poultry slaughter establishment's procedures to prevent contamination and microbial sampling for process control?

Answer: IPP are to be aware of how the establishment has included its written programs to prevent contamination and verify implementation of those programs when performing the applicable food safety verification tasks – either Slaughter HACCP Verification or Operational SSOP Verification tasks (FSIS Directive 6420.5).

Question: What are IPP to do when they determine the establishment is not maintaining sanitary conditions throughout the slaughter HACCP system (e.g., repetitive HACCP or Sanitation SOP noncompliances from multiple aspects of the slaughter system)?

Answer: IPP are to discuss such situations with their immediate supervisor to evaluate the need to take an enforcement action (FSIS Directive 6420.5).

Verifying Procedures to Prevent Contamination in Swine Slaughter Establishments Job Aid

Question: What inspection task do IPP use to document verification of a swine slaughter establishment's procedures to prevent contamination and microbial sampling for process control?

Answer: IPP are to be aware of how the establishment has included its written programs to prevent contamination and verify implementation of those programs when performing the applicable food safety verification tasks – either Slaughter HACCP Verification or Operational SSOP Verification tasks (FSIS Directive 6410.4).

Question: What are IPP to do when they determine the establishment is not maintaining sanitary conditions throughout the slaughter HACCP system (e.g., repetitive HACCP or Sanitation SOP noncompliances from multiple aspects of the slaughter system)?

Answer: IPP are to discuss such situations with their immediate supervisor to evaluate the need to take an enforcement action (FSIS Directive 6410.4).