IKE Scenario 03-07: FSIS Directive 12,600.2- Determining When Inspection Coverage Is Not Required and Overtime Is Not Charged

Purpose: This IKE is issued in support of FSIS Directive 12,600.2, and provides an example of when inspection coverage is not required, and overtime would not be charged.

Situation: You are a relief inspector assigned to a small slaughter establishment. Both your tour of duty and the establishment's approved work schedule are 0700 hours to 1530 hours, Monday through Friday. Slaughter operations are coordinated so that the last carcass of the production day enters the cooler by 1515 hours.

Discussion: This establishment's HACCP plan contains a Critical Control Point (CCP) for carcass chilling temperatures, and the monitoring procedure is clearly described in the HACCP plan. The written monitoring procedure states that the temperature of the last carcass produced each day will be monitored using a pocket thermometer after 12 hours of chilling. You review the HAACP records and observe that this CCP is routinely monitored at 0530 hours Tuesday through Saturday. No other production activities are performed that that time.

You also observe in the establishment Sanitation Standard Operating Procedures (SSOP) records that it has elected to document the time at which its employees perform the pre-operational monitoring of the SSOP. The records show that the establishment routinely conducts the pre-operational SSOP monitoring procedures at 0600 hours Monday through Friday.

You consider whether inspection coverage is required, and whether overtime should be charged either during the times when the establishment monitors the chilling CCP, or when it conducts the pre-operational SSOP monitoring.

Resolution: You review FSIS Directive 12,600.2, Section VII, and note that the performance of both the monitoring function that is established in the HACCP plan, and the monitoring procedures performed in accordance with the SSOP, can be conducted at times other than those hours in which inspection coverage is provided. Therefore, overtime would not be charged.