

IKE Scenario 07-07: FSIS Directive 12,600.2: Determining When Inspection Coverage Is Required and Overtime Is Charged

IKE scenarios are a tool that FSIS inspection program personnel can use to better understand Agency policy. In addition, the IKE scenario result may be just one approach to address a specific situation and is not intended to be a definitive answer, indicating there may be multiple approaches.

Purpose: This IKE is issued in support of FSIS Directive 12,600.2 and provides one example of when inspection coverage is required, and inspection personnel are to charge the establishment for their overtime service.

Situation: You are a relief GS-8 inspector assigned to a small hog slaughter establishment that also performs simple processing and smoked pork processing. Both your tour of duty and the establishment's approved work schedule are 0700 hours to 1530 hours, Monday through Friday. The establishment's practice is to begin its operations promptly at 0700. Slaughter operations are coordinated so that the last hog carcass of the production day leaves the evisceration department and enters the carcass cooler by 1530 hours. Carcass breaking/ cutting and packaging/ labeling activities are completed at 1630 hours. In the processing department, the smoke house is fully loaded by 0800 hours, and the product remains in the smokehouse until 1400 hours. At that time, the product is transferred to the cooler where it is held until 1700 hours to stabilize.

Discussion: Based on the PBIS procedures scheduled for today's operations, you will perform the 01B02 (pre-operational sanitation) procedure. You have determined that you will perform the Review and Observation component of that procedure and will conduct a pre-operational inspection of the slaughter facility beginning at 0630 hours since the establishment chooses to start its slaughter operation promptly at 0700. You will charge for the time that you spend conducting the pre-operational inspection as it will occur before the start of your tour of duty.

This establishment's HACCP plan contains a Critical Control Point (CCP) for smoked pork stabilization temperatures. According to the written monitoring procedure, cooling/stabilization temperatures of product on racks transferred from the smoke house into a cooler will be monitored using a hand held thermometer. The HACCP plan also states that an ongoing verification procedure is performed once per week, involving direct observation of the employee performing the final smoked product stabilization temperature check. The plant manager has informed you that this weekly direct observation activity will occur today at 1700 hours.

As a critical thinker, you consider whether inspection coverage is required, and whether you should charge overtime for the times when: 1) the establishment finishes carcass breaking and packing/ labeling activities, and 2) when the establishment performs a direct observation verification activity at the end of that specific day.

Resolution: You review FSIS Directive 12,600.2, Section VII, and note that all of the establishment's pack-out activities will require inspection coverage because the establishment will be labeling product. In addition, coverage is required in order for you

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to verify the establishment's CCP direct observation verification activity. Therefore, for today's operations, you are to charge overtime to the establishment for the pre-operational inspection as well as the production and HACCP activities that occur after the end of your tour of duty. You are to charge the reimbursable overtime to the establishment in accordance with the guidance provided in the attachments to FSIS Directive 12,600.1, Revision 1, Amendment 1, dated 1/08/07.

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http://www.fsis.usda.gov/FSIS_Employees/IKE_Scenarios/index.asp

This information should also be shared with plant management.