

## Verification Plans

### Objectives

Upon completion of this module the trainee will be able to:

1. Describe what a verification plan is and its purpose.
2. Create a verification plan based upon an establishment's response to an NOIE.

### Purpose

The verification of a plant's corrective measures regarding a NOIE or suspension is one of the most important public health responsibilities of FSIS. The verification plan provides a systematic means for FSIS to ensure that a plant is effectively carrying out its corrective actions regarding a NOIE or suspension. Failure to carry out verification plan activities could:

- Jeopardize public health because the plant may be producing unsafe product
- Negatively impact our ability to take further enforcement.
- Impact the plant's "due process" in that FSIS may be keeping the enforcement action open for a prolonged period without justification.

The verification plan is designed to verify that an establishment has fully implemented revisions to its SSOP and HACCP system, or other corrective actions, and that the revisions and corrections are effective in assuring regulatory compliance. It also assists the plant in understanding the nature and importance of FSIS' verification activities.

### Contents

The Verification Plan mirrors the corrective actions proffered by the establishment. The plan should:

- describe verification activities that will be performed by inspection personnel based on specific corrective actions provided by the plant.
- provide the ISP procedure code associated with each verification activity that will be carried out by the inspection team.
- provide the regulatory citation associated with each verification activity.

The EIAO also determines corrective actions proffered by the plant that cannot be verified through regular PBIS procedures and lists them in the verification plan, e.g., plant improvement plans.

**Example verification plan:**

<u>Plant Action</u>	<u>Reg Cite</u>	<u>Procedure Code</u>
Verify no product contamination in the coolers in use	416.13(b)	01B02/01C02
Verify one cooler is being refurbished per week	416.2(b)(2)	06D01
Verify that plastic is hung daily in coolers in use	416.2(b)(2)	06D01

**PIP Item:**

Verify that the overheads have been refinished at the end of 3 months.

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**When to Develop**

A verification plan should be developed whenever:

- A decision is made to defer enforcement following the issuance of a NOIE.
- A decision is made to hold a suspension in abeyance following the suspension of the assignment of inspectors.

The verification plan must be referenced in the deferral or abeyance letter issued to the plant, and provided to the plant as an enclosure to deferral or abeyance letter.

**Plan Preparation**

The EIAO has primary responsibility for preparing the written verification plan. The EIAO should assure the verification plan covers pertinent issues based on the establishments corrective actions, is comprehensive, and accurately reflects verification activities to be carried out by the inspection team. The EIAO should work collaboratively with the Frontline Supervisor and in-plant inspection team to complete the verification plan and provide it to the plant as soon as possible. A team approach ensures key issues are covered and that proper work methods will be used to conduct verification activities. In some instances, additional time may be needed to prepare the verification plan, to correlate with the in-plant inspection team regarding the inspection methodology, and to make certain resources are available to carry out verification activities. When this occurs, the District will notify the establishment when they can expect a copy of the verification plan.

**Verification Activities**

The EIAO should develop the Verification Plan so that ISP procedures identified in the verification plan are performed as scheduled PBIS procedures. The in-plant inspection team will verify the corrective actions as a part of the inspection procedure. For example,

when performing a HACCP 01 procedure, they may randomly select to verify the monitoring regulatory requirement and, as part of the verification plan, the corrective actions requirement as well.

The in-plant inspection team has the flexibility to increase the frequency of verification based on their findings. For example, if while performing scheduled PBIS procedures, FSIS inspection personnel detect problems, or concerns are raised regarding the effectiveness of the plant in performing its corrective actions, the frequency of PBIS procedures should be increased and unscheduled procedures should be performed. Unscheduled PBIS procedures can also be performed if, as part of its corrective actions, the plant increases food safety monitoring and verification activities.

### **Follow-Up by the EIAO**

The EIAO may be requested to conduct a follow-up at establishments that have an enforcement action deferred or are under a suspension action held in abeyance. This is in addition to the daily verification done by the in-plant team as per the Verification Plan. The EIAO may be requested to determine establishment compliance when there are questions from the in-plant team based on their findings. The EIAO may be requested to do this at the end of the deferral or abeyance period to determine if the action should be closed out.

### **Establishments in Deferral or Abeyance**

Verification activities could reveal a sufficient basis exists to close a deferral decision or suspension being held in abeyance or they could reveal the plant's corrective measures are inadequate and that FSIS should suspend inspection, reinstate a suspension, or initiate proceedings to withdraw inspection. The EIAO would document the basis in a decision document to the DM or in the letter that is sent to the establishment informing them of the decision.

## **Workshop**

1. Describe what a verification plan is and its purpose.
  
  
  
  
  
  
  
  
  
  
2. Using the provided establishment's response to the NOIE, create a verification plan.