

## Verification

Verification activities are tools the establishment uses to establish that the HACCP plan is being followed correctly.

The regulations that apply to verification procedures and frequencies are:

**9 CFR 417.2(c)(7)**—*List the verification procedures, and the frequency with which those procedures will be performed, that the establishment will use in accordance with §417.4 of this part.*

**9 CFR 417.4(a)(2)(i)(ii)(iii)**—*Ongoing verification activities include, but are not limited to: The calibration of process-monitoring instruments; direct observations of monitoring activities and corrective actions; and the review of records generated and maintained in accordance with §417.5(a)(3) of this part.*

You will verify the verification requirement by performing the HACCP 01/02 procedures. You could use either the recordkeeping or review and observation component, or both.

The thought process you should use when verifying regulatory requirements includes:

- gathering information by asking questions;
- assessing the information; and
- determining regulatory compliance.

This thought process should be utilized when verifying all of the regulatory requirements.

### Gather information by asking questions

Verify the regulatory requirements for verification by reviewing the HACCP plan, HACCP records, and observing establishment employees performing verification activities. When verifying the verification requirements, seek answers to the following questions:

1. Does the HACCP plan contain procedures and frequencies for the calibration of the process-monitoring instruments?
2. Does the HACCP plan contain procedures and frequencies for direct observations of monitoring activities and corrective actions?

9 CFR 417.4(a)(2)(ii) requires that establishments have ongoing verification activities that include direct observations of monitoring activities and corrective actions. 9 CFR 417.5(a)(2) requires that establishments have decision-making documents associated with the selection and

development of CCPs and critical limits and documents that support both the monitoring and verification procedures selected and the frequency of those procedures.

It is important that the establishment implement corrective actions that meet the requirements of 9 CFR 417.3(a) each time that a deviation from a critical limit occurs, and the requirements of 9 CFR 417.3(b) each time an unforeseen hazard occurs. Since it cannot be predicted when a deviation from a critical limit or an unforeseen hazard will occur, it would be counterproductive to require that the establishment have specific procedures and frequencies in its HACCP for directly observing corrective actions. It is necessary, however, for an establishment to directly observe corrective actions frequently enough to verify that these actions are being performed in a manner that meets the applicable regulatory requirements. Under the regulation, the establishment is to document these direct observations in the same manner that it documents other verifications.

3. Does the HACCP plan list procedures and frequencies for the review of records generated and maintained in accordance with 9 CFR 417.5(a)(3)?
4. Does the HACCP plan list product sampling as a verification activity?
5. Are process-monitoring instrument calibration activities conducted as per the HACCP plan?
6. Are direct observation verification activities conducted as per the HACCP plan?
7. Are records generated in accordance with 9 CFR 417.5(a)(3) [HACCP records] being reviewed by the establishment?

### **Assess the information**

To answer these questions you should:

- Review the HACCP plan
- Review HACCP records
- Observe establishment employees performing verification activities

Now let's look at each of these activities in more detail.

### **Reviewing HACCP Plan**

When reviewing the establishment's HACCP plan for raw processes, you will determine whether it includes verification procedures such as direct observation procedures and frequencies, records review procedures and frequencies, and process monitoring instrument calibration procedures and frequencies. All three verification activities do not have to occur at each CCP, but all three should be addressed in the HACCP plan. You should review the HACCP plan each time the

verification requirement is verified since the establishment can modify the plan without notifying inspection.

**Verification Example 1:** *You are performing the 03J01 procedure in a poultry slaughter operation and have randomly selected to verify the establishment verification requirements for the chilling CCP. You review the establishment's HACCP plan and find that it specifies verification personnel will review the temperature records and observe the monitoring procedures at this CCP once per shift. It also specifies that maintenance personnel will verify the accuracy of the temperature recording charts once per shift by taking an independent temperature check. Based upon your review of the HACCP plan, you determine that the establishment is in compliance with 417.2(c)(7) and 417.4(a)(2)(i)(ii)(iii). It is important to point out here that some HACCP plans might not contain all three verification activities that are found in 417.4(a)(2)(i)(ii)(iii).*

**Verification Example 2:** *You are performing the 03J01 procedure in a very small sheep and goat slaughter operation and have randomly selected to verify the establishment verification requirements for the contamination (feces/ingesta/milk) CCP. You review the establishment's HACCP plan and find that it does not provide for direct observation of monitoring procedures. You determine that the establishment only has one employee working on the slaughter floor and it would be impossible for direct observation of monitoring to take place. There is no noncompliance in this instance.*

### **Reviewing HACCP Verification Records**

You should review the verification records to determine if the establishment is performing the verification procedures at the frequency specified in the HACCP plan for raw processes.

**Verification Example 3:** *You are performing the 03C01 procedure in a poultry cut-up operation and have randomly selected to verify verification requirements for the finished product storage CCP. You review the establishment's HACCP plan and find **one** of the verification procedures specifies the HACCP Coordinator will observe maintenance personnel perform the monitoring check once per shift. You review several recent room temperature logs and observe that the HACCP Coordinator has recorded results for the verification procedure for each shift. You determine that this requirement is in compliance because the verification procedures are being performed at the frequency specified in the HACCP plan.*

### **Observing Establishment Employees**

You should observe an establishment employee performing the verification activities listed in the plan to determine if the procedures are being carried out as written in the HACCP plan.

**Verification Example 4:** Continuing with the 03C01 procedure from the above example, your review of the establishment's HACCP plan revealed that the other verification procedure specified is that the HACCP Coordinator will check the accuracy of the finished product storage temperature monitoring equipment daily, and calibrate as necessary. You proceed to the HACCP office, and observe the thermometers being checked for accuracy, and results being recorded on the thermometer calibration log. You determine that this requirement is in compliance because the verification procedure is being carried out as written in the HACCP plan.

Keep in mind that the establishment employee performing the direct observation ongoing verification procedure should directly observe the employee doing the monitoring activity. An establishment verifier that is performing the same activity as the monitor does not meet the regulatory requirement in 417.4(a)(iii).

**Verification Example 5:** Continuing with the 03C procedure, you decide to observe the direct observation verification procedure. You observe the HACCP Coordinator in the finished product storage area, observing the maintenance personnel performing the monitoring check. From your observations, you determine that the direct observation verification procedure requirements are met.

Product sampling is considered a verification activity if the establishment incorporates it as such into the HACCP plan. It may be used to verify a CCP or it may be used as an overall verification of the HACCP system and not be associated with any one CCP. For example, some establishments may include their *E. coli* O157:H7 testing programs in their HACCP plans. When that is the case, the CSI must verify the testing program as part of the verification requirement (§417.4(a)(2)). The establishment may perform end-product sampling. If the establishment does end-product sampling, the verification is not necessarily associated with a single CCP, but it could be an overall verification of all the CCPs from the specific HACCP plan. The establishment may do such sampling and choose not to include it in the HACCP plan. If the product sampling is part of the verification of the HACCP plan, the CSI should observe the establishment employee collecting samples and following all the procedures identified in the plan as part of the HACCP 01 and 02 procedures when verifying §417.4(a)(2).

**Verification Example 6:** You are performing the 03B01 procedure in a raw ground beef operation and have randomly selected to verify the establishment verification requirements for the finished ground beef temperature CCP. You review the establishment's HACCP plan and find one of the verification procedures specifies the establishment will conduct finished product testing for *E. coli* O157:H7 daily. You observe the HACCP Coordinator take the samples from the finished ground beef. You observe the production lot control procedures. You

*review several days' records in the laboratory testing log and find negative test results were recorded for each day. You determine that the establishment is in compliance because the verification procedures are being performed as described, and at the frequency stated.*

## **Determine Compliance**

After you have gathered and assessed all available information pertaining to the verification requirement, you must determine regulatory compliance. If you find that the establishment has met all regulatory requirements, then there is no regulatory noncompliance. If you find that the establishment has not met all regulatory requirements, there is noncompliance. You will receive more information about making compliance determinations in a later section.

## **Noncompliance with the Verification Requirement**

The following are examples of noncompliance with the verification requirement:

- 1. The HACCP plan, which has one CCP at the product storage area, specifies that the verification procedure is that the QC supervisor will calibrate thermometers daily and that the QC supervisor will review the finished product room temperature logs daily. You observe that there is no direct observation verification procedure listed for this HACCP plan. You recall that the regulations require that all three verifications must be listed. One, direct observation, is missing. **The HACCP plan does not, at a minimum, list records review verification procedures; direct observation verification procedures; or calibration of process instruments verification procedures.***
- 2. The HACCP plan specifies that the verification procedure for the finished product storage area CCP is that the QC supervisor will calibrate thermometers, that the QC supervisor will observe the plant employee performing the monitoring check, and that the QC supervisor will review the finished product room temperature logs daily. You observe that there is no frequency listed for the calibration of *thermometers*. **The HACCP plan does not list the frequencies at which the calibration verification procedure will be performed.***
- 3. The HACCP plan specifies that one of the verification procedures for the product storage area CCP is that the QC supervisor will observe the plant employee performing the monitoring check. You observe that the QC supervisor performs a monitoring check and records it on the product storage area room temperature log as a direct observation verification procedure. You observe that the QC supervisor did not perform a direct observation of the plant employee performing the monitoring check as described in the HACCP plan. **The establishment***

***is not performing the direct observation verification procedures as specified in the HACCP plan.***

4. *The HACCP plan specifies that one of the verification procedures for the finished product storage area CCP is that the QC supervisor will review the finished product room temperature logs daily. Your review of the record reveals that there is no documentation of this verification procedure for the last three days. **The establishment is not performing the records review verification procedures as specified in the HACCP plan.***
5. *The HACCP plan specifies that one of the verification procedures for the product temperature CCP is that the QC supervisor will verify the accuracy and calibrate, if needed, all stem thermometers daily. You observe that the QC supervisor verifies the accuracy of only about half of the thermometers. When you ask, you are provided the explanation that "we have learned that checking every other thermometer is sufficient." **The establishment is not performing the process monitoring verification procedures as specified in the HACCP plan.***
6. *The HACCP plan specifies that one of the verification procedures is that finished product will be sampled and tested for E. coli O157:H7 once per day. When you review the micro records you observe that there are only results for two samples a week. When you ask about these results you are told that the financial department required QC to cut back on the number of samples sent to outside labs. **The establishment is not performing one or more of the verification procedures listed in the HACCP plan at the frequencies specified in the HACCP plan.***

You will document any noncompliance in accordance with our discussion of documentation and enforcement in a later section.