

Inspection Methods and Regulatory Decision-Making

This section covers how to verify regulatory compliance and make supportable decisions when performing the HACCP 01 and 02 procedures. The requirements are monitoring, verification, recordkeeping, corrective action, and reassessment. Let's start with the monitoring requirements.

Monitoring

The thought process the CSI should use when verifying regulatory requirements should include:

- 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

CSIs verify the monitoring requirement by performing the HACCP 01 or 02 procedures. Use the following thought process and methodology when verifying the monitoring requirements. Verify the regulatory requirements for monitoring by reviewing the HACCP plan, reviewing HACCP records, observing establishment employees performing monitoring activities, and taking measurements at CCPs. When verifying the monitoring requirements, seek answers to the following questions.

1. Does the HACCP plan list the monitoring procedures and frequencies that are used to monitor each of the critical control points to ensure compliance with the critical limits?
2. Are the monitoring procedures being performed as described in the HACCP plan?
3. Are the monitoring procedures being performed at the frequencies for the CCPs listed in the HACCP plan?
4. Are the critical limits met?

Assessing Information

When assessing the information gathered, the CSI should do the following.

- Review the HACCP plan to determine whether the HACCP plan design contains monitoring procedures and frequencies for each CCP. Since the HACCP plan can be modified without the establishment notifying the CSI, the CSI should ensure that he or she is familiar with the monitoring procedures and frequencies in the HACCP plan each time he or she verifies the monitoring requirement. From the HACCP plan, the CSI should be able to visualize what the establishment employees do to monitor the CCP and how often this activity occurs. If the CSI cannot visualize what is occurring at the CCP, it could be an indication that the monitoring procedure is not adequately described.
- Observe an establishment employee performing the monitoring activities listed in the HACCP plan to determine whether the procedures are being carried out as written in the HACCP plan.
- Review monitoring records and/or observe the establishment performing the monitoring procedures to determine whether the monitoring procedures are being performed at the frequencies specified in the HACCP plan.

Determine compliance

After the CSI has gathered and assessed all available information pertaining to the monitoring requirement, he/she 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.

Examples of monitoring noncompliance

There is noncompliance when:

- The establishment is not conducting the monitoring procedures as specified in the HACCP plan.
- The establishment is not performing the monitoring procedures at the frequencies specified in the HACCP plan.
- The CSI takes a measurement at a CCP and finds that the critical limit is not met.