

## **Verification**

This section covers how to verify compliance with the verification requirements while performing your HACCP duties using the HACCP 01 and 02 procedures.

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 verification requirement by performing the HACCP 01 or 02 procedures. The CSI should use the following thought process and methodology verifying the regulatory requirements for verification. The CSI will verify the regulatory requirements for verification by reviewing the HACCP plan, reviewing HACCP records, and observing establishment employees performing verification activities. In verifying the verification requirement, the CSI should seek answers to the following questions:

1. Does the HACCP plan contain verification procedures and frequencies for the calibration of the process-monitoring instruments?
2. Does the HACCP plan contain verification procedures and frequencies for direct observations of monitoring activities and corrective actions?
3. Does the HACCP plan list verification 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 verification activities conducted as per the HACCP plan?
7. Are records generated in accordance with 9 CFR 417.5(a)(3) being reviewed by the establishment as specified in the HACCP plan?

## Assessing Information

When assessing the information, the CSI should do the following:

- Review the HACCP plan to determine whether the HACCP plan lists direct observation procedures and frequencies, records review procedures and frequencies, and process monitoring instrument calibration procedures and frequencies. The CSI should review the HACCP plan each time the verification requirement is verified since the establishment can modify the plan without notifying inspection personnel.
- Observe an establishment employee perform the verification activities listed in the plan to determine if the procedures are being conducted as written in the HACCP plan.
- Review the HACCP records or observe the establishment performing the verification procedures to determine if the verification procedures are being performed at the frequency specified in the HACCP plan.
- If product sampling is included in the HACCP plan, the CSI should observe an establishment employee taking samples and review the results as part of the HACCP 01 or 02 procedures. If the establishment received positive results, the CSI should verify the corrective action requirements of 9 CFR 417.3(b) are met.

The CSI should use good judgment in recognizing that there are times when a HACCP plan might not include all three ongoing verification activities listed in 417.4(a)(2) (i)(ii)(iii). For example, if the establishment has a CCP where process-monitoring equipment is not used, there is no need for process monitoring equipment calibration to be listed as a verification activity. In a very small establishment, there may only be one individual working in the processing area performing both the monitoring and verification activities, this one individual cannot perform a monitoring activity and observe himself doing it as a direct observation verification activity. In this case, the HACCP plan would not need to list a direct observation of the monitoring activities.

Ongoing verification activities should be designed for the establishment verifier to directly observe the establishment employee conducting the monitoring activity. An establishment verifier conducting the same activity as the monitor does not meet the regulatory requirement for the direct observation verification activity described in §417.4(a)(2)(ii). However, the establishment can choose to perform additional verification activities such as taking additional measurements at a CCP.

Product sampling is often viewed as a verification activity if the establishment incorporates product sampling 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 Lm testing programs in the HACCP plan. When that is the case, the CSI must verify the testing program is in compliance with 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).

Each of the 3 on going verification activities are expected in the HACCP plan. It is not required that each be done for every CCP.

### **Determine Compliance**

After the CSI has gathered and assessed all available information pertaining to the verification requirement, he/she must determine regulatory compliance. If the CSI finds that the establishment has met all regulatory requirements, then there is no regulatory noncompliance. If the CSI finds 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.

**Example 1:** The CSI is scheduled to perform the 03I01 procedure. The CSI randomly selects to verify the verification requirement at the finished product storage CCP. The CSI reviews the establishment's HACCP plan and finds one of the verification procedures specifies the HACCP Coordinator will observe maintenance personnel perform the monitoring check once per shift. The CSI reviews several recent room temperature logs and observes that the HACCP Coordinator has recorded results for the verification procedure for each shift. Therefore, the CSI determines that the direct observation requirement is met because the verification procedures are being performed as specified in the HACCP plan.

**Example 2:** Continuing with the 03I01 example, the CSI's review of the establishment's HACCP plan revealed that another verification procedure specified is that the HACCP Coordinator will check the accuracy of the finished product storage temperature monitoring equipment monthly, and calibrate as necessary. The CSI proceeds to the HACCP office, and reviews the thermometer calibration log. The thermometer calibration log has monthly entries demonstrating that the instruments were checked for accuracy as per procedures and frequencies in the HACCP plan. The CSI determines that this requirement is

met because this verification procedure is being carried out as written in the HACCP plan.

Question: Is there any other type of verification activity the CSI may verify?

Answer: Yes-records review.

**Examples of noncompliance include the following:**

1. 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 does not list the frequencies at which the calibration verification procedure will be performed.
3. The establishment is not performing the direct observation verification procedures as specified in the HACCP plan.
4. The establishment is not performing the records review verification procedures as specified in the HACCP plan.
5. The establishment is not performing the process-monitoring instrument calibration verification procedures as specified in the HACCP plan.
6. 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.

Noncompliance with the verification requirement is documented using the verification trend indicator.