

## Linking NRs

NRs should be linked **as they are issued**. Each noncompliance that you believe is from the same cause as the previous noncompliance should be documented as linked at the time the NR is completed. Do not link the current noncompliance to more than one previous noncompliance.

You should continue to link NRs together that derive from the same cause **until you determine that enforcement action is necessary** to bring the establishment into compliance with the regulations. When you determine that enforcement action is necessary, you should contact the District Office and always keep your supervisor apprised of the situation.

**Good judgment** is necessary when determining which NRs to link together. Remember to follow the thought process, gather information by asking questions, assess the information, and make a sound, supportable conclusion. Some factors to consider are:

1. How much time has elapsed since the previous NR was written?
2. Was this noncompliance from the same cause as the previous NR?
3. Were the establishment's further planned actions implemented?
4. Were the establishment's further planned actions effective in reducing the frequency of these noncompliances?
5. Is the establishment continuing to implement better further planned actions?

**Linking Example 1:** You issued an NR for the establishment not performing a monitoring procedure as specified in the HACCP plan. Two weeks later you observe, at a different CCP in the same HACCP plan, that the establishment does not perform the monitoring procedures as specified in the HACCP plan. You decide that these two noncompliances have the same cause (not performing monitoring according to the HACCP plan) and that you should link them in your documentation. You realize you could link these noncompliances even if it was across two different HACCP plans.

**Linking Example 2:** You issued an NR when you took a measurement at CCP 3 and found that the critical limit was not met. Two months later, you observe that the establishment is not conducting the monitoring procedures as specified in the HACCP plan: they missed a monitoring check at CCP 2. Although these are both monitoring noncompliances and are both documented under the same procedure code, you determine that they are not from the same cause. You do not link them in your documentation.

**Linking Example 3:** You issued an NR when you observed that the establishment did not meet one of the recordkeeping requirements, there were no monitor's initials for one result. About four months later, you again observe that the establishment monitor did not initial one of the monitoring results. Although these two noncompliances both have the same cause, you determine that the establishment has shown a substantial period of compliance, and you decide not to link this NR to the previous one.

**Linking Example 4:** You issued an NR on September 2, when the establishment had a deviation, and the corrective actions taken did not meet 417.3. They did not implement measures to prevent the recurrence of the deviation, and they did not take appropriate measures to ensure that the CCP was under control after the actions were taken. On November 4, the establishment has another deviation at the same CCP, and as you verify the corrective actions you observe that the establishment did not implement measures to identify and eliminate the cause of the deviation, and they did not implement measures to prevent the recurrence of the deviation. You determine that although some time has lapsed, the establishment has not shown a substantial period of compliance. You determine that both of these noncompliances are due to the same cause, which is, not completing all parts of the requirements for corrective action, and you decide to link them in your documentation.