

## How to Perform the Two Components

### Recordkeeping

To perform the **recordkeeping** (Rk) component, you will review HACCP records to determine if the establishment recorded its tests or measurements at the required frequency, if all required data was recorded, if the data is accurate, if critical limits have been met, and if corrective action was taken when necessary. When you perform the recordkeeping component you are only reviewing records. Typically this review would take place where the records are maintained and may not be at the physical location of the CCP.

***Example:** You are performing an 01 procedure and are verifying a monitoring procedure. You decide to perform the recordkeeping component. You examine the records associated with this monitoring procedure. You look at the frequency of the entries and the data recorded, and compare the recorded data to the critical limit at this step.*

### Review and Observation

To perform the **review and observation** (R&O) component, you may directly observe plant employees performing the procedures as stated in the HACCP plan (observation) or you may take measurements to see if the values you obtained match those recorded by the establishment (review).

***Example:** You are performing an 01 procedure and are verifying a monitoring requirement, which in this case is a product temperature check. You decide to perform both parts of the review and observation component. You directly observe the plant employee carry out the product temperature check. Then, you take a product temperature measurement, and compare the result that you obtained to the one just recorded by the plant employee.*

## 01 Procedure

The 01 procedure is for verifying one or more of the HACCP regulatory requirements as the establishment executes its HACCP plan. The 01 procedure is designed to provide a “snapshot” of the HACCP system.

There are three requirements that are **randomly** verified during the 01 procedure: monitoring, verification, and recordkeeping. Corrective actions and reassessment are not randomly verified as part of the 01 procedure since they are performed as a result of some event that triggers them. For example, you would verify the corrective action requirements are met anytime there is a deviation from a critical limit, a deviation not covered by a specific corrective action, or an unforeseen hazard. Similarly, you would verify the reassessment requirement if the establishment significantly changes its process, or encounters an unforeseen hazard.

You must have a method to randomly select one (or more) of the three requirements

to be verified during the performance of the procedure. For example, you may choose to draw pieces numbered one through three from a container. You can use your FSIS computer to select random numbers. See Appendix 1 for instructions.

*To perform the 01 procedure, you will do the following:*

1. **Randomly** select one (or more) of the three HACCP requirements to verify.
2. Select a HACCP plan and one (or more) of the CCPs from that plan to verify.
3. Determine which component (review and observation or recordkeeping) to perform.
4. Review those portions of the HACCP plan you are to verify and perform the verification for **that requirement** for **that CCP**.

**01 Example:** *Your PS for today lists 03F01. The establishment to which you are assigned has one HACCP plan in this processing category, for turkey jerky. You read the HACCP plan to be familiar with the CCPs. This HACCP plan has 3 CCPs. You decide to pick 1 regulatory requirement to verify. You have a die and a previously determined procedure that 1&2 represent monitoring, 3&4 represent verification, and 5&6 represent recordkeeping. You roll and get a 2 (monitoring), and make a note of this result. You decide to verify this requirement at CCP 3 of the HACCP plan. Next, you think about which component to perform, and decide to perform the review and observation component. You read the monitoring part of CCP 3 in the HACCP plan. You proceed to the processing floor to begin to perform the review and observation component to verify the monitoring regulatory requirements at CCP 3 for the turkey jerky.*

*If the establishment had more than one HACCP plan in this processing category, you might pick one HACCP plan to verify regulatory compliance. You might also decide to verify regulatory compliance with a requirement, monitoring for this example, for more than one HACCP plan.*

**Note:** If you determine noncompliance while performing the 01 procedure, you must then perform the 02 procedure.

## **02 Procedure**

The 02 procedure is for verifying **all regulatory requirements** at all of the critical control points in the HACCP plan for a **specific production**. The 02 procedure cannot be completed until the establishment performs the pre-shipment review for that specific production. Because 02 procedure looks at a specific production, you are additionally determining whether the establishment prevented the distribution of adulterated product.

**Note:** You should follow-up on any 01 procedure that results in a noncompliance determination by performing an 02 procedure on that specific production.

**Specific production** is a term that is used to refer to whatever method the establishment uses to group product. FSIS does not determine the method used to

define specific production, this is an establishment's responsibility. You will see a variety of different types of methods used. Establishment's might define all product from one formulation batch, one shift's production, or the product in one retort as a specific production. It is important for you to understand the method used by the establishment to which you are assigned. You can determine this by asking plant management.

There may be times when you are not able to finish reviewing the entire process on the day that the O2 procedure is begun. In this case you should mark the Procedure Schedule as "not performed" on the day that you start your review. When you have completed the review, you need to record on the Procedure Schedule that you completed the O2. If that particular O2 procedure is already scheduled on that day, then mark it according to your determination of compliance/noncompliance. If that particular O2 is not assigned on the day your review is completed, then document the O2 as unscheduled on the Procedure Schedule.

*To perform the **O2** procedure, you will do the following:*

1. Verify that **all** of the HACCP requirements have been met for **all CCPs** in the HACCP plan for that **specific production**. Read each CCP that applies to specific production from the appropriate HACCP plan.
2. Verify that the **pre-shipment review** requirement for that specific production has been met.

**O2 Example:** *Your PS for today lists 03E02. This establishment has one HACCP plan in this processing category, salami sticks. You know from previous experience that this establishment defines specific production as each day's production lot. The establishment performs pre-shipment review each morning on the production lots which pass the final CCP, drying. This may take between 4-5 weeks. You proceed to the HACCP office and determine that one production lot passed the drying CCP today. You read the HACCP plan. You begin your verification that all of the HACCP requirements were met for all of the CCPs in the HACCP plan for this specific production, including the pre-shipment review. You will use the recordkeeping component in this case because production is complete.*

The following table summarizes the concepts we have just covered regarding the 01 and 02 HACCP procedures.

### **HACCP Procedures – Components Used and Requirements Verified**

	COMPONENTS USED BY THE CSI	HACCP REGULATORY REQUIREMENTS VERIFIED
<b>01</b>	<ul style="list-style-type: none"><li>• Recordkeeping and/or</li><li>• Review &amp; Observation</li></ul>	<b>One or more</b> of the three regulatory requirements - randomly selected at <b>one or more CCPs</b> . Corrective Action and Reassessment can be verified using 01 but not randomly.
<b>02</b>	<ul style="list-style-type: none"><li>• Recordkeeping and/or</li><li>• Review &amp; Observation</li></ul>	<b>All</b> of the regulatory requirements for <b>all CCPs</b> , including the pre-shipment review for a specific production.