

Verification

Verification activities are tools the establishment uses to ensure 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?
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, 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 03F01 procedure in a beef jerky operation and have randomly selected to verify the establishment verification requirements for the water activity (a_w) CCP. You review the establishment's HACCP plan and find that it specifies quality control personnel will review the water activity records and observe the monitoring procedures at this CCP once per shift. It also specifies that quality control personnel will verify the accuracy of the water activity measuring equipment once per shift by performing a calibration check procedure. Based upon your review of the HACCP plan, you determine that the establishment is in compliance with **this part** of §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 03E01 procedure at a very small establishment which makes dry sausage, and have randomly selected to verify the establishment verification requirements for the water activity 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 in the production area and it would be impossible for direct observation of monitoring to take place. There is no noncompliance with §417.4(a)(2)(ii) 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.

Verification Example 3: *You are performing the 03F01 procedure in a dry sausage operation and have randomly selected to verify the verification requirements for the addition of antimicrobial agent at the formulation CCP, using the recordkeeping component. You review the establishment's HACCP plan and find that **one** of the verification procedures specifies the HACCP Coordinator will observe production personnel perform the monitoring check once per shift. You review several recent formulation 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 this verification procedure is being performed at the frequency specified in the HACCP plan. You realize that this is just one of the verification activities.*

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: *You are performing the 03E01 procedure in a pepperoni operation. Your review of the establishment's HACCP plan reveals that one of the verification procedures specified is that the HACCP Coordinator will check the accuracy of the raw 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 **this** 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)(2)(ii).

Verification Example 5: *As part of the 03F02 procedure, you decide to observe the direct observation verification procedure. You accompany the HACCP Coordinator to the packaging area, and watch while he observes the packaging personnel performing the monitoring check at the post lethality treatment CCP, and records the result. 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, a dry sausage establishment may include a laboratory testing program for *E. coli* O157:H7 in its HACCP plan as a verification for a particular CCP. When that is the case, you must verify the testing program as part of the verification requirement (§417.4(a)(2)). Another establishment might include an end-product sampling and

laboratory testing program for *Salmonella* as an overall verification for a beef jerky HACCP plan. This verification is not associated with a single CCP, but it is considered to be an overall verification of all the CCPs from the HACCP plan. You 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 03F01 procedure in a beef jerky operation and have randomly selected to verify the establishment verification requirements for the finished product water activity CCP. You review the establishment's HACCP plan and find that as a verification of the a_w , one of the verification procedures specifies the establishment will conduct finished product testing for Salmonella daily. You observe the HACCP Coordinator take the samples from the finished product. 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 this verification procedure is being performed at the frequency and using the procedure 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 the verification regulatory requirements, then there is no regulatory noncompliance. If you find that the establishment has not met the verification 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 cooking, specifies that the verification procedure is that the QC supervisor will calibrate thermometers daily and that the QC supervisor will review the cooking logs daily. You observe that there is no direct observation verification procedure listed. You recall that the regulations require that all three verifications must be addressed in the HACCP plan. **The HACCP plan does not list direct observation verification procedures.***
2. *A beef jerky HACCP plan specifies that the verification procedure for the cooking/drying CCP is that QC will check the accuracy of the time, temperature and humidity monitoring equipment and have them calibrated if necessary; QC will observe the cook room operator performing the monitoring check daily; and that QC will review the cooking logs daily. You observe that there is no frequency listed for the calibration check of equipment. **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 cooking 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 cooking 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 metal detection CCP is that the QC supervisor will review the metal detection logs daily. Your review of the records reveals that there is no documentation of this verification procedure for the last three days of production. **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 fermentation/cooking CCP is that the QC supervisor will verify the accuracy and calibrate all three production pH meters once per shift. You observe that the QC supervisor verifies the accuracy of only of one of the pH meters in use. **The establishment is not performing the process monitoring equipment 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 Listeria monocytogenes once per day. When you review the micro records, you observe that there are only results for one sample a week. **The establishment is not performing one 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.