

VERMONT AGENCY OF AGRICULTURE, FOOD & MARKETS  
FOOD SAFETY CONSUMER PROTECTION DIVISION  
Meat Inspection Service  
MONTPELIER, VT  
Roger Allbee, Secretary



# MIS DIRECTIVE

Adopted from FSIS Directive 5100.4

5100.4

10/30/09

## PRIORITIZED SCHEDULING OF FOOD SAFETY ASSESSMENTS (FSAs)

### I. PURPOSE

This directive provides the decision criteria in scheduling food safety assessments (FSAs). It includes background information on prioritizing FSAs, instructions on prioritized scheduling of an FSA, an FSA Scheduling Priorities and Criteria Quick Reference Table.

### II. [RESERVED]

### III. [RESERVED]

### IV. REFERENCES

[9 CFR 300 to end.](#)

*Federal Register* Notice: Salmonella Verification Sample Result Reporting: Agency Policy and Use in Public Health Protection ([71 FR 9772, 2/27/06](#))

*Federal Register* Notice: Salmonella Verification Sampling Program: Response to Comments and New Agency Policies ([73 FR 4767, 1/28/08](#))

[FSIS Directive 5000.1](#), Verifying an Establishment's Food Safety System

[FSIS Directive 5100.1](#), Enforcement, Investigations, And Analysis Officer (EIAO) Comprehensive Food Safety Assessment Methodology

[FSIS Directive 5100.3](#), Administrative Enforcement Reporting System

[FSIS Directive 5610.1](#), Procedures to Implement the Consumer Complaint Monitoring System (CCMS)

[FSIS Directive 8080.1](#), Recall of Meat and Poultry Products

[FSIS Directive 8080.3](#), Foodborne Illness Investigations

[FSIS Directive 10,000.1](#), Policy on Use of Results From Non-FSIS Laboratories

[FSIS Directive 10,010.1](#), Verification Activities For *Escherichia coli* O157:H7 In Raw Beef Products

[FSIS Directive 10,240.5](#), Verification Procedures For Enforcement, Investigations, and Analysis Officers (EIAOs) for *Listeria monocytogenes* (*Lm*) Regulation and Routine Risk-based *Listeria monocytogenes* (*RLm*) Sampling Program

[FSIS Directive 10,300.1](#), Intensified Verification Testing (IVT) Protocol For Sampling of Product, Food Contact Surfaces, and Environmental Surfaces for *Listeria monocytogenes*

**DISTRIBUTION:** Electronic

**OPI:** OPPD

### V. BACKGROUND

DISTRIBUTION: Electronic

SUBJECT: Inspection

The Agency will place processing and slaughter establishments into a priority level for FSA scheduling using public health decision criteria, in addition to traditional event-based scheduling. The Meat Inspection Office is to prioritize the scheduling of FSAs based on the criteria outlined in this directive and on the availability of EIAOs. An establishment that meets one or more of the criteria under any of the priority levels in Table 1 will receive a “for cause” FSA. A “for cause” FSA is one that is prompted by a positive sample result, production and shipment of adulterated product, or any other high priority food safety related incident. The Agency will also be scheduling routine FSAs and routine risk-based *Listeria monocytogenes* (RLm) microbiological sampling, which includes the completion of a comprehensive FSA, at a minimum of once every 4 years.

**Table 1: “For Cause” FSA Scheduling Priorities and Criteria Quick Reference**

Scheduling Priority	Criteria
1 <sup>st</sup> Priority	Positive <i>Escherichia coli</i> ( <i>E. coli</i> ) O157:H7 on ground beef or patties or raw beef components after In-depth Review is performed (see <a href="#">VT Directive 10,010.1</a> and related <a href="#">VT Sampling Program</a> )
	Positive <i>Listeria monocytogenes</i> ( <i>Lm</i> ), <i>Salmonella</i> or <i>E. coli</i> O157:H7 in ready-to-eat (RTE) products or a positive <i>Lm</i> food contact surface sample (see <a href="#">FSIS Directive 10,300.1</a> )
	Establishment that produced and shipped adulterated or misbranded product, undergoing a Class I or Class II recall (see <a href="#">FSIS Directive 8080.1</a> )
	Establishment subject of a Part 416 or 417 related enforcement action that is not the result of an FSA
	FSIS positive <i>Salmonella</i> in heat treated, not fully cooked, not shelf stable stuffed poultry product
	Human illness linked to VT-regulated product (see <a href="#">FSIS Directive 8080.3</a> )
	Establishment with a history of health-related noncompliance records and is in the highest percentile of health-related NR rates
	Establishment in PR HACCP <i>Salmonella</i> Category 3 (see <a href="#">Federal Register Notice 73 FR 4767, January 28, 2008</a> )
	Establishment produced product with repetitive <i>Salmonella</i> serotypes of public health concern (see <a href="#">Federal Register Notice 73 FR 4767, January 28, 2008</a> )
2 <sup>nd</sup> Priority	Establishment produced product with <i>Salmonella</i> PFGE matches (see <a href="#">Federal Register Notice 73 FR 4767, January 28, 2008</a> )
	Documented change in an establishment’s production process that may impact public health
	Consumer complaints associated with meat or poultry products
	New establishments coming under a permanent grant of inspection
	Repeat residue violators from same supplier source (see <a href="#">FSIS Directive 10,800.1</a> )
3 <sup>rd</sup> Priority	Establishment subject of other enforcement action that is not the result of an FSA (e.g., 9 CFR 500.3(a)(6), or 500.3(b))

**VI. PRIORITIZED SCHEDULING OF FSAs BY THE DCS**

**A. “For Cause” FSA Scheduling Information**

- a. If an Establishment meets a criteria above, FSAs will be scheduled with the highest priority level first (see Table 1);
- b. Discretionary FSAs may be scheduled by the MI office as needed

2. When an EIAO completes a “for cause” FSA in an establishment that is not subject to 9 CFR Part 430 regulations, FSIS will have met its requirement of scheduling an establishment for an FSA at a minimum of once every 4 years.
3. When a “for cause” FSA is triggered for reasons other than a positive *Lm* result in an establishment subject to 9 CFR Part 430 regulations, an RLM is also to be performed as part of that FSA. This RLM will be substituted for the 4-year minimum frequency RLM in this establishment. If an FSA had recently been completed in the establishment before the “for cause” trigger, the office may elect to decide the need for this additional FSA.
4. When a “for cause” FSA is performed as a result of a positive *Lm* sample, an IVT is to be conducted as part of that FSA.
5. A “for cause” FSA is to be completed within 90 days of receipt of the notification. If the 90 day window cannot be met, the MI office is to document the reason in the case file.

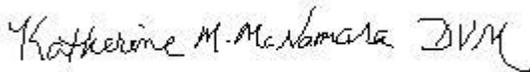
#### **B. Routine (non-RLm) FSA Scheduling Information**

1. The MI office is to schedule a routine (non-RLm) FSA to be conducted at a minimum of once every 4 years in each official establishment that is not subject to the 9 CFR Part 430 regulations.

#### **C. Routine RLM FSA Scheduling Information**

1. The MI office is to schedule a routine (RLm) FSA to be conducted at a minimum of once every 4 years in each official establishment that is subject to the 9 CFR Part 430 regulations.
2. Each establishment that makes post-lethality exposed RTE product will be ranked based on the alternatives it uses, products it produces, and its production volume.

For technical questions, contact the Policy Development Division at 1-800-233-3935, or the VT Meat Inspection office at (802)828-2426.



Katherine M. McNamara, DVM  
Head of Service - Meat Inspection Service  
ATTACHMENT 1

