VERMONT AGENCY OF AGRICULTURE, FOOD & MARKETS
FOOD SAFETY CONSUMER PROTECTION DIVISION
MONTPELIER, VT
Chuck Ross, Secretary

MIS NOTICE	A-13	10/23/13

Documenting Laboratory Verification Sampling Tasks in state PHIS

I. PURPOSE

This policy provides new instructions to inspection program personnel (IPP) for documenting sampling tasks in state PHIS. The state version of PHIS does not include a mechanism to schedule or document the performance of sampling tasks on the task calendar for state establishments. In order to be able to do this, the VT Meat Inspection Program will use the appropriate HACCP category task, such as "Raw Non-intact HACCP" task, as a Directed task, with a few modifications listed below. IPP are to continue to schedule and document routine HACCP tasks not related to sampling, as instructed.
While this method of adding to an existing PHIS task is not ideal, it will be used until there is a functional fix that will allow IPP to document the performance of verification sampling tasks in state PHIS.

II. INSPECTION PROGRAM PERSONNEL RESPONSIBILITIES

Raw Product Samples
A. When documenting the collection of samples under the Agency's verification testing programs for raw beef or poultry products, IPP are to use the "Raw Non-intact HACCP" , "Raw intact HACCP", or "Slaughter HACCP" task and schedule it on the Task Calendar as a Directed Task. The reason chosen for the Directed task should be "Supervisor Instruction".

Right click on the task in the Task calendar and choose Document to begin to document the task."
B. On the **Task** Tab:
1.Verify the Reason for Directed task is "Supervisor Instruction".
2. In the Reference Reason ID box, write in the sample taken (i.e. Ground O157H7, Trim O157H7, chick Salm/Campy, etc.)
C. On the **Activity** Tab:
1. Choose Review and Observation
D. On the **Regulations** Tab:
1. For red meat, mark the lines with regulation 301.2 Adulterated, and 417.4(a) Adequacy of

HACCP in controlling food safety hazards, as verified.

2. For poultry, mark the line with 417.4(a) Adequacy of HACCP in controlling food safety hazards, as verified.

3. For any of the other mandatory regulations, mark those that you verify as "verified" and mark the others as NA. For justification of the NA, click the edit pencil and choose "Supervisory Instruction".

E. On the **Findings** Tab:

1. In the Sample Form number box, list the VT seal number that was associated with the sample taken.

2. In the Comments text box, copy and paste the list of questions/information that should be gathered for each sample take. See Attachment A,B (red meat) and C (poultry) for these questions and **VT Notice 6-13**.

NOTE: For efficiency and ease, IPP can save these questions in a document on their computer desktop, and copy and paste the questions into this text box in PHIS whenever taking a sample.

F. Click the save button and then close the task.

G. Once the Sample results are known, click on Document task again, and choose the Findings Tab. In the second text box, labeled as "Affirmative Findings", record the sample results received from the lab.

H. If the sample results are positive, see PHIS Directive 5000.1 on documenting non-compliance in PHIS, and Directive 10010.1 Chapter 3 Section III for specifics on a sample positive.

Ready-to-Eat Product Samples

A. When documenting the collection of samples under the Agency's verification testing programs Ready to Eat Products, IPP are to use the "Fully Cooked-Not Shelf Stable", "Not Heat Treated-Shelf Stable/Heat Treated-Shelf Stable", or "Product with Secondary Inhibitors – Not Shelf Stable" and schedule it on the Task Calendar as a Directed Task. The reason chosen for the Directed task should be "Supervisor Instruction".

Right click on the task in the Task calendar and choose Document to begin to document the task."

B. On the **Task** Tab:

1.Verify the Reason for Directed task is "Supervisor Instruction".

2. In the Reference Reason ID box, write in the sample taken (i.e. Product/FCS, environmental)

C. On the **Activity** Tab:

1. Choose Review and Observation

D. On the **Regulations** Tab:

1. The following regulations should be marked verified:
   417.4(a),
   301.2 adulterated, 381.1 adulterated (if poultry), and
   430.4(c)(3).

2. For any of the other mandatory regulations, mark those that you verify as "verified" and mark the others as NA. For justification of the NA, click the edit pencil and choose "Supervisory Instruction".

E. On the **Findings** Tab:

1. In the Sample Form number box, list the VT seal number that was associated with the sample taken.

2. In the Comments text box, copy and paste the list of questions/information that should be gathered for each sample take. See Attachment D for these questions.

NOTE: For efficiency and ease, IPP can save these questions in a document on their computer desktop, and copy and paste the questions into this text box in PHIS whenever taking a sample.

F. Click the save button and then close the task.

G. Once the Sample results are known, click on Document task again, and choose the Findings Tab. In the second text box, labeled as “Affirmative Findings”, record the sample results received from the lab.

H. If the sample results are positive, see PHIS Directive 5000.1 on documenting non-compliance in PHIS, and Directive 10240.4 Revision 2 for specifics on a sample positive.

III. QUESTIONS

Refer questions regarding this notice to the Vermont Meat Inspection Section at 802-828-2426.

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Attachment A: In-House Source Materials
IPP are to collect the following supplier information if the establishment produces in-house the source materials that are used in the production of the sampled lot. Include under the Findings tab in the Comments section when documenting the performance of a verification sampling task for beef or veal. You can copy and paste into the comment field in PHIS:

1. Confirmation that the source materials were produced in house (establishment name and number);

1. Sample request type

2. Sampled product name (veal, beef, mixed?):

3. VT seal number

4. Production date (incl. slaughter production dates if avail.):

5. Collection date:

6. Date sent/given to lab:

7. Lot Identification code or slaughter date:

8. How Is Product Held or controlled by Establishment?:

9. Approximate amount of the beef component produced in each lot (in lbs).

10. Confirmed and documented cleaning between lot(s)?

11. Emergency Contact Person & number in case of presumptive/confirmed positive after hours/weekends:

12. Name of the beef components used in the production of the sampled product (e.g., beef trimmings, subprimal cuts, beef hearts, veal trimming, weasand, head or cheek meat) or any information that clearly identifies the source material used

13. Information on the label of the source product. If the establishment labels any of the products it produces in-house, IPP may review the package or product labeling of the source materials used in the production of the ground beef or beef trim. Shipping invoices or other records may not always provide enough information to identify the producing establishment.

14. Any other pertinent information:

Attachment B: Source Materials from Other Domestic Suppliers

IPP are to collect the following information at the time of sample collection from each producer regarding source materials that were produced by domestic suppliers and used in the production of the sampled lot:

1. Sampled product name (veal, beef, mixed?):

2. Name of the beef components used in the production of the sampled product (e.g., beef trimmings, subprimal cuts, beef hearts, veal trimming, weasand, or head or cheek meat) or any information that clearly identifies the source material used. Collect information from the label of the product;

3. VT seal number

4. Production date (incl. slaughter production dates if avail.):

5. Collection date:

6. Date sent/given to lab:

7. Lot Identification code or slaughter date:

8. How Is Product Held or controlled by Establishment?:

9. Approximate amount of the beef component produced in each lot (in lbs).

10. Confirmed and documented cleaning between lot(s)?

11. Emergency Contact Person & number in case of presumptive/confirmed positive after hours/weekends:

12. Establishment name and number (from the slaughter establishment or the establishment that produced the source materials);

13. Phone number of that establishment;

14. Point of contact of that establishment:

    a. Name;

    b. Title;

    c. E-mail address; and

    d. Fax number:

15. For a meat product purchased from a broker or a distributor, the establishment number on the shipping container of the product.

Attachment C:
List of information to include under the Findings tab in the Comments section when documenting the performance of a verification sampling task for poultry Performance Standards testing. You can copy and paste into the comment field in PHIS:

1. Establishment name & number:

2. Sample type

3. VT seal number

4. Production date (incl. slaughter production dates if avail.):

5. Collection date:

6. Date sent/given to lab:

7. Lot Identification code or slaughter date:

8. Any other pertinent information:

Attachment D: Ready to Eat Product or FCS or Environmental Samples
IPP are to collect the following information at the time of sample collection.
Record the following information for each sample collected under the Findings tab in the Comments section when documenting the performance of a verification sampling task in PHIS:

1. Record the most appropriate RTE product type that represents this sample:

- Other Fully Cooked Sliced Product
- Hot Dog Products
- Salad/Spread/Pate
- Diced/Shredded
- Meat + Nonmeat components
- Sausage Products
- Patties/Nuggets
- Other Fully Cooked Not Sliced Product
- Acidified/Fermented Products
- Dried Products
- Salt-cured Products

2. How many pounds of product are in the sampled lot?

Enter the size of the sampled lot as defined by the establishment. The sampled lot is product that is represented by the sample collected by VAAFM and analyzed for Lm and Salmonella.

NOTE: *VAAFM generally considers the sampled lot to be the product produced from "clean-up to clean up" for RTE products, unless the establishment has a different supportable definition. Factors or conditions that determine a sampled lot size include frequency of cleaning and sanitizing and separation between processing lines. IPP are to refer to FSIS Directive 10,240.4, Ch. I. General, V. Terminology, D. The Sampled Lot, for further explanation of how to determine the sampled lot size.*

3. Is the product post-lethality exposed?

- Yes
- No

Answer "Yes" if the product is exposed to the environment of the establishment after the lethality step. For example, the product does not remain in a cooking bag and it comes

in contact with food contact surfaces, air, brine, or other environmental conditions during the cooling, processing, slicing, or packaging steps. If you answer "Yes," then you must also answer question 2a.

Answer "No" if the product is: (1) cooked in a bag and remains in the cooking bag until it reaches leaves the establishment; (2) treated with a process (e.g., high pressure processing) that achieves a full lethality (e.g., 5-log decrease of Salmonella) in the product once it is in its final packaging; or (3) hot filled (e.g., lard) at a temperature sufficient to achieve full lethality of the product. If you select "No," then skip question 2a and proceed to answer question 3.

3a. Which alternative was this product produced under?

- ALT 1
- ALT 2 PLT (Post-Lethality Treatment)
- ALT 2 AMAP (Anti-Microbial Agent or Process)
- ALT 3

Select "ALT 1" if the establishment uses a post-lethality treatment to reduce or eliminate Lm in the product and an AMAP to limit or suppress growth of Lm in the product.
Select "ALT 2 PLT" if the establishment uses a PLT to reduce or eliminate Lm in the product.
Select "ALT 2 AMAP" if the establishment uses an AMAP to limit or suppress growth of Lm in the product.
Select "ALT 3" if the establishment relies on sanitation alone to control Lm in the processing environment and on the product.

4. Line ID:

Use the name or number that the establishment uses to identify the line (e.g., ham line or line 1). If no line ID is available, enter "N/A."

5. Time of Collection:

6. Establishment Contact Name:

Enter both the first and last name of the establishment's designated contact person.

7. Establishment Contact Phone:

Enter the establishment's designated contact person's phone number.

8. Was plant management notified of this sample collection?

- Yes/No

9. Is this sample short weighted or slack filled?

- Yes/No

9. Is the submitted sample in the final retail package?

- Yes/No

Select “yes” if the following situation applies: if intact product or product container is too large, heavy, or costly to ship to the laboratory, IPP can ask the establishment to slack-fill or short-weight a product for a 2-pound sample and send it in the usual establishment packaging such as the container liner.

10. Where is product held?

- On-site
- Off-site under company control
- Sampled lot was not held or controlled by establishment because the establishment has a written program to divert all raw beef product VAAFM samples for *STEC* to cooking
- Sampled lot not held or controlled by establishment because the product was denatured on-site
- Product not held or controlled by establishment, and the establishment did not wait to complete pre-shipment review following availability of all relevant test results, as set out in 9 CFR 417.5(c)
- Other