

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



MIS DIRECTIVE

Adopted from FSIS Directive 12600.1 Rev. 2

12600.1
Rev. 2

11/1/23

VOLUNTARY AND OTHER REIMBURSABLE INSPECTION SERVICES

I. PURPOSE

This directive instructs inspection program personnel (IPP) on voluntary and other reimbursable inspection services that an applicant may request, the tasks that IPP are to perform under these services, and how to charge the applicable fees for these services. This directive instructs Office personnel on approving or denying voluntary and other reimbursable inspection services. This directive has been revised in its entirety to clarify existing instructions and provide additional instructions for voluntary and other reimbursable inspection services based on common questions, and input from IPP. This directive has also been updated to include current definitions for exotic species.

Per 6 V.S.A. § 3305 (8), the federal meat inspection regulations and federal poultry inspection regulations of the U.S. Department of Agriculture, Title 9, Code of Federal Regulations, Chapter 3, 9 CFR §§ 300.1 et seq., together with any amendments, supplements, or revisions thereto, are adopted, for the State meat inspection program to operate in an 'equal to' status.

KEY POINTS

- *Instructs VAAFM employees how to determine whether facilities meet the requirements to receive the requested services*
- *Instructs IPP what to inspect when providing voluntary and other reimbursable inspection services*
- *Instructs IPP on the voluntary tasks to perform and how to record these tasks in the Public Health Information System (PHIS)*
- *Provides instructions on how to charge for voluntary and other reimbursable services*
- *The Vermont state meat inspection program does not provide services to import, egg product or Siluriformes establishments.*

II. CANCELLATION

FSIS Directive 12,600.1 Revision 1 Amendment 2, *Voluntary Reimbursable Inspection Services*, 7/2/07

DISTRIBUTION: Electronic

OPI: OPPD

III. BACKGROUND

A. The [Federal Meat Inspection Act](#) (FMIA), the [Poultry Products Inspection Act](#) (PPIA), and the [Vermont State Statutes](#) (6 V.S.A.) provide for VAAFM inspection of meat and poultry products at official establishments to verify they are not adulterated and are properly labeled. Official establishments are locations that have Meat Handlers Licenses (AKA Grants of Inspection) as described in these statutes and are assigned numbers with an “M,” and/or “P,” designation for meat and poultry.

B. Preparing and processing meat and poultry may only be performed at official establishments.

C. [6V.S.A §3305\(15\)](#) authorizes the VT Secretary of Agriculture to establish rules to provide voluntary inspection, and withdrawal of inspection, of exotic animals, wild game, game birds, red deer, Bison and Cervidae, and of meat and meat food products derived from those animals; and to charge and collect fees to cover the cost for reimbursable inspection services provided under the Vermont Meat and Poultry Inspection Program.

Per 6 V.S.A. § 3305 (8), VAAFM has adopted federal regulations to perform voluntary and other reimbursable services based on this authority to inspect, certify, and identify the class, quality, quantity, and condition of agricultural products when shipped or received in intrastate commerce at warehouses and official establishments. These services are conducted only when requested by the establishment. VAAFM collects fees from all facilities (including official establishments) that request voluntary inspection, other certification services, and other services rendered by Agency employees that are not required by the FMIA, PPIA, other parts of 6 V.S.A, or otherwise referred to in statute (6 V.S.A §9). In this directive, in order to distinguish between official establishments that request voluntary services and facilities that are not official establishments that request voluntary services, a facility is called “unofficial” when only voluntary or other reimbursable services are requested and no activities that require mandatory inspection are performed at the facility. In this directive, when the term facility is used, without official or unofficial qualifiers, that means the information applies to both official establishments and unofficial facilities. Although the word “official” is used in some of the definitions (e.g., “official exotic animal establishment” in [9 CFR 352.1](#)) this directive refers to these facilities as “unofficial” facilities when the information applies only to these locations where only voluntary inspection is provided.

D. Facilities that are approved for reimbursable inspection services are assigned establishment numbers with V designations in PHIS. When an unofficial facility only has an assigned V number, the V number indicates that VAAFM performs only voluntary or other reimbursable inspection services at the location and, therefore, is not an official establishment. An official establishment that is also authorized for voluntary or other reimbursable services is assigned a V number in addition to the M or P numbers. It is possible for an official establishment to have a V number, an M number, and a P number, and the number assigned with each letter may be different.

E. VAAFM requires all facilities where it provides voluntary or other reimbursable services to:

1. Maintain sanitary conditions (e.g., [9 CFR 416.1-416.5](#));
2. Meet any other regulatory requirements applicable to the products involved (e.g., temperature requirements for rabbits) or services requested;
3. Apply the State mark of inspection to products only when voluntary or other reimbursable inspection services are provided; and

4. Remain current on payments to VAAFM.

IV. TYPES OF VOLUNTARY OR OTHER REIMBURSABLE SERVICES

A. VAAFM provides food inspection service as a reimbursable service for the processing of certain food articles that contain meat or poultry but do not require mandatory Federal or State inspection under the FMIA, PPIA or 6V.S.A. 204 as described in [9 CFR 350.3\(c\)](#) and [9 CFR 362.2\(a\)](#). This service is discussed in [Section VI](#).

B. VAAFM provides voluntary inspection of exotic animals for wholesomeness as a voluntary service described in [9 CFR part 352](#). Exotic animals are defined in [9 CFR 352.1\(k\)](#) as any reindeer, elk, deer, antelope, water buffalo, bison, buffalo, or yak. This service is discussed in [Section VII](#).

C. VAAFM provides voluntary inspection of rabbits for wholesomeness as a voluntary service described in [9 CFR part 354](#). This service is discussed in [Section X](#).

D. VAAFM provides voluntary inspection of any migratory waterfowl or game bird for wholesomeness as a voluntary service described in [9 CFR part 362](#). This service is discussed in [Section X](#).

V. GENERAL IPP RESPONSIBILITIES

A.

A. IPP are to record inspection tasks in PHIS for each requested visit when instructed supervisors or managers to provide a requested service. IPP are not to travel to these locations unless the service has been requested. IPP are to verify that the facilities meet applicable requirements and that products produced under voluntary inspection are wholesome by performing the appropriate tasks for the specific service at the frequencies described in Table 1.

B. The only tasks IPP are to perform while providing voluntary or other reimbursable are identified with a (V) after the task name. The verification activities for each inspection task only apply to the areas, rooms, or departments where VAAFM conducts the voluntary or other reimbursable service and any surrounding areas that directly impact inspected products. The Update Establishment Profile (V), SPS (V), and General Labeling (V) tasks apply to all facilities where voluntary or other reimbursable services are performed. Other tasks performed during voluntary and other reimbursable services only apply in specific instances. IPP are to direct questions about providing any service to their immediate supervisor.

Table 1: PHIS Tasks for Voluntary or Other Reimbursable Inspection Services

Task Name	Routine Frequency
Update Establishment Profile (V)	1 per month when the unofficial facility operates under voluntary or other inspection service any days within the month
SPS Verification (V)	1 per shift when services are requested
General Labeling (V)	1 per 5 operating days when services are requested (i.e., once per week when operating every weekday)

Humane Handling (V)	1 per shift when VAAFM inspected exotics slaughter occurs
Good Commercial Practices (V)	1 per shift when VAAFM provides voluntary poultry slaughter inspection

C. PHIS does not schedule all the inspection tasks for facilities under voluntary or other reimbursable services because these services are performed only when requested. The PHIS task distributor assigns the tasks a minimum number of times to make the tasks available in the task list for each facility identified in the PHIS establishment profile as approved for a voluntary or other reimbursable service. IPP are to schedule as many additional directed tasks as needed to meet the frequencies in Table 1, depending on when the service is requested. IPP are to perform an SPS (V) task every shift when voluntary inspection services are provided even though these tasks are assigned on the PHIS task calendar task list at a minimum frequency.

EXAMPLE: A voluntary service is provided 10 times in a month, but PHIS only has five routine SPS (V) tasks assigned for that month. IPP are to schedule the five routine tasks and add five directed SPS Verification (V) tasks. IPP are to consult their immediate supervisor for questions on the assignment of work at facilities where the service is requested.

D. IPP are to review [FSIS Directive 13000.1](#), *Scheduling In-Plant Inspection Tasks in the Public Health Information System (PHIS)* for instructions on how to schedule tasks.

E. IPP are not to complete Sanitation Standard Operating Procedures (Sanitation SOP) or Hazard Analysis and Critical Control Point (HACCP) tasks when performing voluntary or other reimbursable inspection services, even if the unofficial facility voluntarily has a Sanitation SOP or HACCP program or the official establishment voluntarily has a Sanitation SOP or HACCP program for nonamenable products.

F. IPP are to perform the Update Establishment Profile (V) task and refer to [FSIS Directive 5300.1](#), *Managing the Establishment Profile in the Public Health Information System*, for instructions on how to update the establishment profile. IPP are to review the establishment task list and ensure that the following tasks do not appear when the unofficial facility only performs voluntary activities:

1. Food Defense;
2. Big 8 Formulation;
3. Review of Establishment Data;
4. Livestock or Poultry Zero Tolerance;
5. SRM Control Verification;
6. Livestock or Poultry Finished Product Standards;
7. Livestock Humane Handling; and
8. Poultry Good Commercial Practices.

G. IPP are not to perform the tasks listed under F1-8 above when performing voluntary or other reimbursable services. These tasks may appear on an establishment task list in an official establishment that also requests voluntary or other reimbursable services, but IPP are to perform the tasks only during

mandatory inspection activities.

H. IPP are not to complete the requested certification or allow products to receive State marks of inspection if IPP observe insanitary conditions, find that products are unwholesome, or cannot determine that those products or conditions conform to applicable requirements. IPP are to contact their immediate supervisor when necessary, for help determining what subsequent actions to take.

I. IPP are to retain products using an VAAFM Form MI-6VT Retained/Reject Tag, when they observe adulterated or misbranded products in an official establishment as authorized in [9 CFR 500.2\(a\)](#), [9 CFR 561.1](#), or [9 CFR 590.426](#). IPP are also to use VAAFM Form MI-6 when they observe adulterated or misbranded products other than meat or poultry products that have been or are in the process of being inspected by VAAFM in an unofficial facility in order to withhold the voluntary mark of inspection (e.g., adulterated or misbranded exotic meat). IPP are to contact their supervisor if the establishment requests to ship the retained products without the VAAFM voluntary mark of inspection.

J. IPP are to contact their supervisor when they observe adulterated or misbranded products that have entered commerce in an unofficial facility. IPP are generally not authorized to detain products that have entered commerce. IPP that have been authorized and instructed by their supervisor are to detain adulterated or misbranded products as outlined in [VT Directive 8410.1](#), *Detention and Seizure*, [9 CFR part 329](#), [9 CFR part 381 subpart U](#), [9 CFR part 559](#), or [9 CFR 590.240](#) using a red VAAFMVT Detained Tag when there is reason to believe that food products under VAAFM jurisdiction or that bear the voluntary mark of inspection in an unofficial facility are adulterated or misbranded.

K. IPP are to charge fees for all reimbursable services for the time required to render such service as instructed in [Section XII](#) of this directive.

L. IPP are to follow the instructions to verify SPS regulatory requirements as described in [VT Directive 5000.1](#), *Verifying an Establishment's Food Safety System* to complete the SPS (V) task. The SPS (V) task is used to verify wholesomeness in products produced under voluntary or other reimbursable inspection services. IPP are to:

1. Verify that the facility is operated and maintained in a manner sufficient to prevent the creation of insanitary conditions and to prevent the adulteration of products;
2. Make observations and review records (if available) to verify regulatory requirements for each type of service requested;
3. Document noncompliance using PHIS. IPP are not to certify or allow marking with voluntary marks of inspection on products until the facility corrects any sanitation related noncompliance ([9 CFR 350.6](#), [351.20](#), [352.6](#), [9 CFR 354.45](#)); and
4. Discuss with their supervisor any questions they have about the wholesomeness of a product.

M. IPP are to verify any applicable labeling requirements as described in [FSIS Directive 7000.1](#), *Verification of Non-food Safety Consumer Protection Regulatory Requirements*, and [VT Directive 7221.1](#), *Prior Labeling Approval* and document the results in the General Labeling (V) task.

VI. SPECIFIC VERIFICATION ACTIVITIES FOR VOLUNTARY OR OTHER FOOD INSPECTION SERVICE ([9 CFR 350.3\(c\)](#), [362.2\(a\)](#))

A. IPP are to verify, through direct observation of processes, examination of products, and review of records, that the preparation and labeling of the products comply with the applicable provisions in [9 CFR 350.3\(c\)](#) and [9 CFR 362.2\(a\)](#). For purposes of voluntary or other reimbursable services, a food article is an item containing meat, poultry, meat byproducts, or meat or poultry food products for which an applicant requests and pays for the mark of inspection, but for which the FMIA, PPIA and 6V.S.A. do not require inspection (e.g., meal kit containing a fully-labeled meat or poultry component, closed-face sandwich, casings, or poultry broth).

B. IPP are to perform the SPS (V) task to verify the applicable sanitation and wholesomeness provisions for voluntary food inspection service related to non-amenable poultry (e.g., the slaughter and processing of migratory waterfowl or game birds and any poultry or human food products made from poultry that are not covered by the inspection requirements of the PPIA).

C. IPP are to perform the SPS (V) task to verify livestock origin components of a food article and livestock casings originate from federally or state inspected and passed carcasses or legally imported livestock origin components.

D. IPP are to perform the General Labeling (V) task to verify:

1. Labeling provisions in [9 CFR 317.2](#) and [9 CFR part 381 Subpart N](#) for voluntary food inspection service related to meat and poultry products that do not require inspection under the Acts;
2. Products found to be wholesome are marked with the mark of inspection using the assigned V number in place of the M or P number of the official establishment in the official inspection legend;
3. Sketch label approval for all products produced under this service; and
4. Product labels are not misleading and list all ingredients, including big 8 allergens and other ingredients of public health concern, if present.

NOTE: Non-amenable products that do not contain any meat or poultry or were not derived from meat products or poultry products (e.g., “cheese pizza”) are not eligible for this inspection service.

VII. SPECIFIC VERIFICATION ACTIVITIES FOR VOLUNTARY INSPECTION OF EXOTIC SPECIES ([9 CFR part 352](#))

A. IPP are to perform inspection tasks relating to the slaughter and processing of exotic animals and exotic animal products as a reimbursable service when requested by an official establishment or unofficial facility that has been approved for this service in accordance with [9 CFR 352.3](#). IPP are to provide State voluntary inspection services for species listed in [9 CFR part 352](#) (reindeer, elk, deer, antelope, water buffalo, bison, buffalo, or yak). IPP are to review records and make observations to verify that facilities and operations comply with the requirements of [9 CFR part 352](#) under the SPS (V) and General Labeling (V) tasks.

NOTE: Instructions for rabbits and non-amenable poultry are in [Section X](#).

B. IPP are to consider the amenability of exotic/cattle crosses based on producer documentation, if documentation is available. In the absence of producer documentation, IPP are to consider the appearance of the animal to determine amenability.

1. Beefalo or buffalo beef have an appearance of cattle and are amenable to FSIS and state mandatory inspection and would be marked with a Vermont mark of inspection.
2. Cattalo (or catalo) are any hybrid animal with bison appearance resulting from direct cross breeding of bison and cattle. Cattalo have an appearance of bison, are not amenable to VAAFM inspection, and can be slaughtered under VAAFM voluntary inspection service. When slaughtered under VAAFM inspection cattalo are marked with a rectangle mark of inspection.

C. IPP are to perform ante-mortem on exotic animals presented for voluntary inspection according to [VT Directive 6100.1](#), *Ante-mortem Livestock Inspection*, to determine wholesomeness. IPP are not to apply the requirements for non-ambulatory disabled cattle to exotic species. IPP are to perform field ante-mortem inspection as described in [9 CFR 352.4](#) and [352.10](#) when requested by the facility, provided the Chief of Inspection has approved the field ante-mortem location. The Chief or designee is to consider the following before approving field ante-mortem:

1. Sanitation of the field ante-mortem area;
2. Safety of IPP in the field ante-mortem area;
3. Proximity to the slaughter facility; and
4. Availability of a veterinarian assigned to the area to perform post-mortem disposition on all incoming "VT Suspect" tagged animals.

NOTE: When the slaughter occurs in a field immediately adjacent to the slaughter facility, including a mobile slaughter facility, VAAFM considers the field as if it were a pen at the facility ([9 CFR 352.10\(c\)](#)); the requirements for field ante-mortem do not apply.

D. IPP are to verify that exotic animals are slaughtered and handled in compliance with [9 CFR 352.10](#). [9 CFR 352.10](#) cross references [9 CFR 313.2](#) and [9 CFR 313.15](#) or [313.16](#). IPP are to document findings in the Humane Handling (V) task. IPP are not to perform the Livestock Humane Handling task or document HATS time for exotic species slaughter. When a facility slaughters both exotics and amenable livestock on the same day, IPP are to complete a Humane Handling (V) task for the exotics slaughter and a separate Livestock Humane Handling task where IPP are to include the HATS time spent verifying humane handling related to the amenable species slaughter. IPP are to follow the instructions in [VT Directive 6900.2](#), *Humane Handling and Slaughter of Livestock* for how to verify only [9 CFR 313.2](#), [313.15](#), and [313.16](#) for exotic animals slaughtered at the facility. When exotic species are slaughtered by ritual methods as described by a religious authority, [9 CFR 313.15](#) or [313.16](#) may not apply. IPP are to follow the instructions in [VT Directive 6900.2](#) to document noncompliance under the Humane Handling (V) Task or notify their supervisor when IPP observe inhumane treatment of exotic animals in connection with slaughter related to these regulatory requirements. IPP are not to apply the Animal and Plant Health Inspection Service (APHIS) 28 Hour Law to exotic species.

E. IPP are to verify that the facility has a written program in place to verify each individual animal identification against the associated Canadian export health certificate for all exotic ruminants (e.g., bison) imported under APHIS restriction for immediate slaughter. For exotic species from Canada arriving for immediate slaughter under APHIS restriction, IPP are to verify before ante-mortem inspection that:

1. The facility is approved by APHIS to receive Canadian ruminants;

2. Loads arrive with an intact Canadian government seal or a U.S. government seal and presents a Canadian export health certificate and either a Veterinary Services (VS) Form 17-36, "Inspection Report of Establishment [Approved] for Immediate Slaughter of Import Animals" or are listed as an approved establishment on the [APHIS website](#);

NOTE: APHIS requires slaughter facilities that want to receive bison or other exotic ruminants from Canada for immediate slaughter to enter into an agreement with APHIS, so the establishment employees can break APHIS seals.

3. All Canadian exotic ruminants in each load are unloaded and penned separately from domestic livestock or domestic exotics;
4. The facility segregates, identifies, and presents all dead-on-arrival (DOA), and dead-in-pen (DIP) exotics to IPP. IPP are to account for all Canadian DOA and DIP animals on official documents associated with each shipment and in PHIS;
5. The facility has a written program in place to verify each individual animal ID against the associated Canadian health certificate;
6. The facility implements their procedures to verify individual animal identification against the associated Canadian health certificate.

F. During ante-mortem inspection on Canadian exotics imported under APHIS restriction for immediate slaughter, IPP are to verify that:

1. The number of animals on the truck, pen, or lot at the time of ante-mortem inspection is less than or equal to the number of exotics listed on the associated VS Form 17-33, "Animals Imported for Immediate Slaughter" or the Canadian health certificates; and
2. Each animal in each load of Canadian exotics has an official Canadian Food Inspection Agency (CFIA) ear tag or identification. IPP are to control and withhold from slaughter any individual animal missing an official identification tag or with an incorrect official identification tag with a VT Condemned tag or a VT Retained/Reject tag and notify their supervisor.

G. IPP are to perform post-mortem inspection according to [9 CFR 352.11](#), which refers to [9 CFR part 310](#). IPP are to record slaughter totals provided by the establishment and slaughter dispositions under the applicable class and subclass in the PHIS Animal Disposition Reporting page and perform post-mortem inspection as instructed in [VT Directive 6100.2](#), *Post-mortem Livestock Inspection* using:

1. Post-mortem inspection procedures for cattle when inspecting mature bison, buffalo, elk, reindeer, yak, and large deer;
2. Post-mortem inspection procedures for calves when inspecting young bison, buffalo, yak, and elk; or
3. Post-mortem inspection procedures for lamb or sheep when inspecting antelope and small deer.

H. During post-mortem inspection on Canadian exotics imported under APHIS restriction for immediate slaughter, IPP are to verify that:

1. The Canadian exotics are slaughtered together as a lot. The establishment may request authorization from the veterinarian to slaughter sub-lots for operational reasons; and
2. The establishment maintains the identity of each animal (or lot of animals) of Canadian origin until PM inspection is completed ([9 CFR 352.11](#), which refers to [9 CFR 310.2](#)).

I. Veterinarians assigned to facilities that slaughter Canadian exotics imported for immediate slaughter are to complete, sign, and date VS Form 17-33 and maintain records in VAAFMM files for at least 5 years. Veterinarians are to send a copy of the signed and dated VS Form 17-33 to the Port of Entry as written on the form within 14 calendar days of receipt.

J. IPP are to perform the following specific verification activities during the voluntary processing and slaughter of exotics:

1. IPP are to verify [9 CFR 310.18](#), which prohibits visible feces on carcasses and carcass parts, under the SPS (V) task. Under this requirement, establishments are to remove any such contamination from carcasses and parts before they may be found wholesome and receive the mark of voluntary inspection ([9 CFR 352.1\(i\)](#)). IPP are to verify this requirement as part of post-mortem inspection and the SPS(V) task. The Livestock Zero Tolerance task does not apply to exotic species.
2. IPP are to verify the labeling of exotic products produced under voluntary inspection under the General Labeling (V) task. IPP are to allow the rectangular mark of inspection only on exotic animal products from animals slaughtered and processed under VAAFMM voluntary inspection as specified in [9 CFR part 352](#). When inspected by VAAFMM, these products may be marked with a rectangular shaped mark of inspection depicted in [9 CFR 352.7](#) with the number assigned to the facility printed within the rectangle or elsewhere on the packaging material.

a. Carcasses that are further processed in the same facility where they are slaughtered are not required to be stamped with the mark of inspection on the slaughter floor unless stamping is the only method available to maintain the identity of the products (e.g., to separate amenable and exotic carcasses or separate inspected and non-inspected carcasses).

b. IPP are to verify that products are not misbranded and that all ingredients, including any allergens or ingredients of public health concern are accurately identified on the label.

c. IPP are to verify that the label file maintained at the facility matches labels applied to products. If IPP question a label, IPP are to submit a question to the Program Supervisor and supply the label approval number from the sketch along with the V number for the facility.

d. IPP are to verify that only American Bison (*Bison bison*) and Cattalo are labeled as "Bison" ([9 CFR 352.1\(e\)](#) and [352.1\(g\)](#)). Any animal from the genus *Bison* may be labeled as "Buffalo".

e. IPP are to discuss concerns with their supervisor when they observe products produced from animals of the subtribe Bubalina of the tribe Bovini that have been labeled as buffalo or bison. Within this subtribe *Bubalus bubalis* is commonly known as water buffalo and *Syncercus caffer* is commonly known as Cape buffalo.

3. IPP are to provide voluntary inspection of processed exotic products only if the exotic animal raw materials are received for processing with the rectangular mark of inspection. Exotic animals slaughtered outside of FSIS or VAAFM inspection (e.g., import, FDA) are not eligible for use in voluntary inspected products.
4. IPP are to verify that amenable meat or poultry products (e.g., products formulated with 2% or more cooked or more than 3% raw amenable meat or poultry) are produced under mandatory inspection in an official establishment and labeled as VAAFM Inspected and Passed. Exotic animal products may be used as ingredients in an amenable product at any proportion if the finished product contains an amenable amount of meat or poultry. IPP are to consider exotic meats that are not slaughtered under VAAFM voluntary inspection to be the same as any other FDA ingredient used in amenable products.
5. IPP are not to collect samples of non-amenable products for an amenable livestock sampling program (e.g., for residue or for pathogens).
6. IPP are not to apply or allow the establishment to apply the rectangle state mark of inspection to carcasses or parts of cervid animals tested for Chronic Wasting Disease until after “not detected” test results are received if a carcass is tested. VAAFM requires testing to determine if meat from cervid animals is wholesome. IPP are to allow establishments to hold or further process (e.g., bone) tested carcasses pending test results provided that the establishment properly identifies and maintains control of the affected carcass or parts. IPP are to observe how the establishment addresses cross contamination during further processing of these products and ensure the carcass and parts are handled in a sanitary manner.

NOTE: Exotic animals slaughtered under voluntary inspection do not require the removal of specified risk materials (SRMs); SRMs are only found in cattle as defined in [9 CFR 310.22\(a\)](#).

VIII. SPECIFIC VERIFICATION ACTIVITIES FOR POULTRY AND RABBIT VOLUNTARY INSPECTION

- A. IPP are to perform inspection activities relating to the slaughter, processing, condition, and wholesomeness of non-amenable poultry and poultry products as a voluntary reimbursable service under [9 CFR part 362](#). IPP are to perform inspection activities relating to the slaughter and processing of rabbits as a voluntary service under [9 CFR part 354](#).
- B. IPP are to perform ante-mortem and post-mortem activities when providing slaughter services and enter slaughter totals provided by the facility in the Animal Disposition Reporting in PHIS as described in [VT Directive 6100.3](#), *Ante-Mortem and Post-Mortem Poultry Inspection*. IPP are to record both rabbit slaughter totals and voluntary poultry slaughter totals under poultry in the PHIS Animal Disposition Reporting page.
- C. IPP are to verify that birds slaughtered under VAAFM voluntary inspection are slaughtered in accordance with [9 CFR 362.2\(a\)](#). 9 CFR 362.2(a) cross references 9 CFR part 381 and does not exclude 9 CFR 381.65(b). IPP are to document findings in the Good Commercial Practices (V) task. IPP are not to perform the Poultry Good Commercial Practices task to document verification of 9 CFR 381.65(b) for poultry slaughtered under voluntary services. When a facility slaughters both amenable poultry and poultry under voluntary services, IPP are to complete a Good Commercial Practices (V) task for the verification done under voluntary services and a separate Poultry Good Commercial Practices task for verification done for amenable poultry slaughter. IPP are to follow the instructions in [VT Directive 6110.1](#), *Verification of Poultry Good Commercial Practices* to verify that the facility operates in compliance with [9](#)

[CFR 381.65\(b\)](#) and notify their supervisor when IPP observe concerns related to Good Commercial Practices.

NOTE: There is no reference to humane handling or good commercial practices in 9 CFR part 354 and no applicable cross references to these requirements for rabbit slaughter.

D. IPP are to perform the SPS (V) task to verify that the facility is maintained in a sanitary condition and the products are wholesome.

E. IPP are to perform the General Labeling (V) task to verify:

1. Labeling records contain sketch approval for each label;
2. Poultry products slaughtered or processed under voluntary inspection are marked with the poultry mark of inspection and the assigned V number;
3. Rabbit products slaughtered or processed under voluntary inspection are marked with the mark of inspection as shown in [9 CFR 354.65](#) and the digits of the assigned V number (i.e., P-XXXX in the round mark where XXXX are the number digits of the assigned V number); and
4. All ingredients, including allergens or ingredients of public health concern, included in the products are listed so the product is not misbranded.

IX. CHARGING FOR VOLUNTARY OR OTHER REIMBURSABLE INSPECTION SERVICES

A. IPP are to charge official establishments and unofficial facilities for the time they spend on site performing voluntary inspection or other reimbursable services and the applicable travel time required to perform the reimbursable service. Whenever IPP are performing verification activities associated with voluntary or other reimbursable inspection services, the time is reimbursable, even when the inspector is within the assigned tour of duty. IPP are to charge for voluntary or other reimbursable inspection services provided both during their official tours of duty and for voluntary or other reimbursable services provided on overtime and holidays. IPP are to refer questions on billing, completing paperwork, accounting codes, establishment numbers, and delinquent payments to the Chief of Inspection. IPP are to refer specific questions on how to charge for voluntary or other reimbursable inspection services in a specific assignment or for a specific shift to their supervisor.

B. IPP are to record the time for voluntary or reimbursable services rendered on the Vermont Exotic Inspection Statement Form. IPP are to be aware that rates for fees to be charged and collected for service are determined annually by the Business office and are specified in an annual letter to each establishment.

C. IPP are to charge in ¼ hour (15 minute) increments for voluntary or other reimbursable services. Reimbursable charges are rounded to the nearest quarter hour as prescribed in the Vermont Time Entry Manual and Collective Bargaining Agreements.

D. IPP are to charge for the time required to furnish voluntary or other reimbursable inspection services, including the travel time required to provide the service ([9 CFR 350.7\(c\)](#), [351.9](#), [352.5\(c\)](#), [354.106](#), and [362.5\(c\)](#)). IPP are to prorate the costs (i.e., to divide in a proportional way based on time) charged to each establishment when travel is required for voluntary or other reimbursable services at multiple facilities.

EXAMPLE: An inspector is on a patrol assignment consisting of three locations. While at the first official establishment visited for the day, the Supervisor assigns the inspector to travel to a facility where rabbit slaughter is performed. The inspector completes the scheduled work at the first official establishment and stops at the facility located between the two official establishments, before inspecting at the second official establishment. The rabbit facility is a 10-minute driving time off the route between the two official establishments. The inspector spends 1.5 hours at the facility performing verification activities before continuing to the second official establishment on the patrol assignment. The inspector is to charge for the one and a half hours (90 minutes) of reimbursable services performed at the facility. The driving time to and from the facility is 10 minutes each way, for a total of 20 minutes and there is no prorating since only one location is receiving reimbursable service. The inspector charges all the time spent traveling to and from the facility and the time spent performing the service to the unofficial facility. IPP are to charge the facility 90 minutes + 20 minutes, or 110 minutes, then round the charge to the nearest ¼ hour or 1 & ¾ hours.

E. IPP are to charge an official establishment or unofficial facility for a minimum of 2 hours when instructed by their supervisor to perform a call back. A call back occurs when a facility requests inspection services after the employee has completed the workday and left the premises or after the employee has completed their regularly scheduled workweek and is called back to duty during an overtime or holiday period. IPP are to record the time necessary to perform reimbursable inspection services during a call back. To ensure facilities are billed, IPP are to record the time in their weeklies, as well as on the Exotic Inspection Statement.

F. Supervisory personnel are to consider daily duty limitations described in [FSIS Directive 4610.6, Daily Duty Limitations for Inplant Inspectors](#), when assigning coverage for voluntary or other reimbursable services.

X. APPROVING AND DENYING VOLUNTARY OR OTHER REIMBURSABLE INSPECTION SERVICES

A. The Chief or designee is to request that applicants for voluntary or other reimbursable inspection services use [Request for Voluntary Inspection Form 5200-6](#). This form is a different application than the [VT Form MI-86 Request for State Meat Inspection Services](#), and the [Meat Handler Application License](#). The Chief or designee is to request all three applications from official establishments that also request voluntary or other reimbursable inspection services. The Chief is to refer to [VT Directive 5220.1 Grant of Inspection Management in PHIS; Process for Licensing](#),

B. When an applicant submits the Request for Voluntary Inspection Form 5200-6, the Chief or designee is to visit the facility to determine whether it meets the general requirements for the service requested. The Chief or designee is to verify that the facility meets the sanitation requirements and the applicable regulatory requirements for the service in the area of the facility where VAAFM will perform the voluntary or other reimbursable inspection service. The Chief or designee is to evaluate the facility for the requirements specified by the type of services requested.

C. The Chief or designee is not to assign a V number for the facility to use for voluntary or other reimbursable services when facility requirements for the requested services are not in compliance or when the activities described by the applicant require a state meat or poultry grant of inspection and are not eligible for voluntary or other reimbursable inspection services.

D. The Chief or designee is to document his or her findings if they determine VAAFM will not provide the service.

E. If the facility meets the requirements for the requested services, the Chief or designee is to work with

the Program Supervisor to identify the appropriate V number through PHIS as described below, assign the number to the facility, and agree to furnish the requested service by signing [Vermont Form 5200-6](#). Instructions on how to add a voluntary or other reimbursable service to PHIS are contained in [VT Directive 5220.1](#).

F. The Program Supervisor is to:

1. Ensure the number on a paper VT Form 5200-6 is designated with a “V” at the beginning (e.g., VXXX), in the same format it appears in PHIS;
2. Reserve the V number that corresponds to an official establishment’s previously assigned number when an official establishment applies for voluntary or other reimbursable services. If the corresponding V number is already assigned, proceed to the next available V number;
3. If the establishment is a slaughter establishment and requires a brand with a V number, review the available brands the office to assign. The other option if the establishment wants to have the same V number as their establishment number is to have the establishment purchase a brand.
4. Verify that the next available V number is not already assigned to an official establishment or official import inspection establishment as an M or P number. Only select V numbers where the number for all grant types is currently available;
5. Reserve the corresponding M or P numbers so they are not assigned to another official establishment. The Chief is to reserve the numbers for all grant types even when the unofficial facility is not applying for a State license to prevent misbranding; and
6. Verify that only the requested numbers (corresponding to the applications submitted) are selected as active in PHIS.

G. The Chief or designee is to inform the facility that once the application process is complete, for each occasion that the facility requires voluntary or other reimbursable inspection services, the management of the facility is to request inspection coverage from the VAAFM Office or through the notification process established by the Chief. The Chief is to provide the applicant with guidance on how the service is to be requested and how VAAFM will confirm coverage of the request.

H. The Chief may deny a request for service for administrative reasons, (e.g., no availability of VAAFM personnel to perform the service or the applicant’s reimbursable services account is delinquent) until the cause for denial of service is alleviated. However, the Chief is to make a reasonable effort to provide all requested reimbursable services.

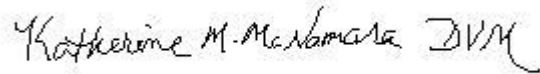
I. The Chief may deny reimbursable services for any of the following reasons:

1. Insanitary conditions found in the facility that would render the products unwholesome;
2. Improper records or certificates;
3. Management or employees of the facility fail to comply with any conditions of the VAAFM agreement to furnish voluntary or other reimbursable inspection services;
4. Management or employees of the facility violate the applicable VAAFM regulations or the FMIA, PPIA, or 6 V.S.A. 204; or
5. Failure to remain current on payments to the reimbursable services account.

J. The Chief or designee is to refer the case to the Assistant Attorney General assigned to the Agency, as instructed in [VT Directive 8010.5](#), *Case Referral and Disposition*, when there is reason to believe voluntary or other reimbursable inspection service should be indefinitely denied or withdrawn.

XIV. QUESTIONS

Questions can be referred to the meat inspection office at 802-828-2426.

A handwritten signature in black ink that reads "Katherine M. McNamara" followed by a stylized monogram "DM".

Head of Service
VT Meat Inspection Service