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

MIS NOTICE **Adopted from FSIS Notice 48-24**	48-24	12/17/24

PUBLIC HEALTH INFORMATION SYSTEM PHYSICAL PLANT MODIFICATION PROFILE QUESTIONNAIRE AND READY-TO-EAT QUESTIONNAIRE TASK

NOTE: NEW PHIS TASK AND QUESTIONNAIRES AVAILABLE ON: DECEMBER 23, 2024

I. PURPOSE

This notice instructs inspection program personnel (IPP) on the actions to take to complete two new questionnaires in the Public Health Information System (PHIS): the Physical Plant Modification Profile Questionnaire and the Ready-to-Eat (RTE) Questionnaire. The notice instructs IPP to complete the new Physical Plant Modification Profile Questionnaire one-time in all official establishments. This notice also instructs IPP to schedule and complete a separate Ready-to-Eat (RTE) Questionnaire task on a recurring routine basis in all official establishments with Active RTE Product Groups as entered in the Establishment Profile in PHIS. This notice instructs Supervisors and Office personnel of responsibilities and actions to take in response to questionnaire and report findings. FSIS is issuing this notice, and the associated questionnaires, to gather data about potential immediate food safety risk factors in official establishments and for future decision-making.

II. BACKGROUND

A. Inspection personnel perform routine inspection duties related to establishment facilities and operations as instructed in VT Directive 5000.1, Verifying an Establishment's Food Safety System, VT Directive 5000.4, *Performing The Pre-Operational Sanitation Standard Operating Procedures Verification Task*, VT Directive 5000.5, *Verification of Less Than Daily Sanitation Procedures in Meat and Poultry Processing Operations and Egg Products Establishments*, FSIS Directive 7111.1, *Verification Procedures for Lethality and Stabilization*, VT Directive 10240.3, *FSIS Ready-To-Eat Sampling Programs*, VT Directive 10240.4, *Listeria Rule Verification Activities*, and other applicable policy issuances, in addition to instructions from the supervisory chain.

B. The new Physical Plant Modification Profile Questionnaire and new RTE Questionnaire Task do not replace the instructions in VT Directive 5000.1, or instructions in any other policy issuances related to documentation of noncompliances, noncompliance record (NR) trend analyses, existing reports, lab sample results, or instructions from the supervisory chain. Rather, the questionnaire answers will be supplemental information to be used in conjunction with those items for data analysis and decision-making.

C. For the purposes of this notice and these new questionnaires, physical plant modification includes any modification to the physical establishment that temporarily affects the production environment such as new

equipment (removed or installed), air circulation modifiers, new construction, drilling, removal or repair of drains, removal or repair of floor coatings, removal or repair of a wall or ceiling, or exposure of areas not typically accessible for cleaning.

D. 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.

III. AWARENESS MEETINGS

A. The Inspector-in-Charge (IIC) or designee is to make establishment management aware of this notice at the next weekly meeting. The IIC is to document the discussion about this notice in a Memorandum of Interview (MOI) as instructed in VT Directive 5010.1, *Food Safety Related Topics for Discussion During Weekly Meetings with Establishment Management*.

B. In official establishments with Active RTE Product Groups, the IIC is to notify the establishment of the RTE Questionnaire task information contained in this notice.

IV. IIC RESPONSIBILITIES

A. IICs, or their designees, are to collect the information for the entire establishment (all shifts) that will be needed to answer the questions in the new one-time Physical Plant Modification Profile Questionnaire and the questions in the new recurring routine RTE Questionnaire task. The respective questionnaire questions are listed in Attachment 1 for reference.

B. Inspection personnel are required to complete this one-time questionnaire in all RTE establishments. It will gather data on modifications to the physical establishment that may temporarily affect the production environment, such as new equipment installations, construction, or repairs. This questionnaire should be done now but is required within 30 days of the notice. **By January 17, 2025.**

1. Download the One-time physical plant profile questionnaire. This is used for all RTE establishments under our CIS and State inspection program.
2. Conduct a weekly meeting with the establishment and add the questionnaire to the MOI.

C. Inspection personnel are instructed to schedule and complete the RTE Questionnaire on a recurring basis in establishments with *active RTE product groups:*

1. These products can be consumed without any additional preparation, such as cooking or heating, to ensure their safety. Examples include deli meat, cooked sausages, jerky, prepared salads, or certain smoked or cured items.

2. Are Produced or Handled in an Establishment; The term "active" indicates that the establishment currently manufactures, processes, or packages these RTE items as part of their ongoing operations.

3. Carry Food Safety Considerations: Because RTE products do not require further cooking, they must meet strict safety standards to ensure they are free from harmful pathogens such as *Listeria monocytogenes, Salmonella, or E. Coli*.

NOTE: At this time, the routine RTE Questionnaire task is to be completed at a frequency of weekly during an assigned performance period of one month; that is, a scheduled frequency of 4 times in 20 working days.

D. The purpose of these questionnaires is to collect data on potential immediate food safety risk factors in official establishments, aiding future decision-making. They supplement existing inspection duties and do not replace current procedures related to documentation of noncompliance's or other established reports.

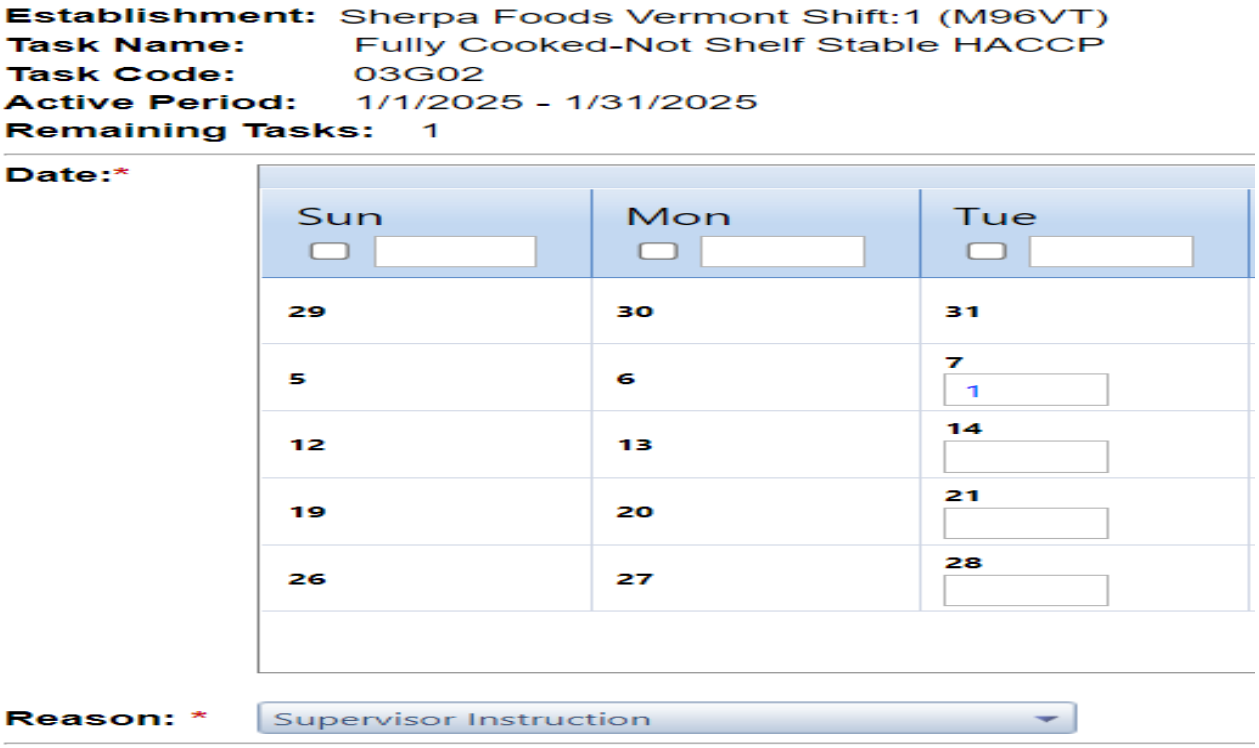
E. Inspectors are to inform establishment management about this notice during the next weekly meeting and document the discussion in an MOI.

F. The RTE Questionnaire task questions are risk based, and IICs are to notify their supervisor immediately if concerns arise, including but not limited to when the answer to any of the questions suggest vulnerabilities in the food safety system that may result in increased food safety risks, as instructed in VT Directive 5000.1. IICs are to continue to follow the instructions related to RTE products in VT Directive 5000.1, VT Directive 5000.4, , VT Directive 5000.5, FSIS Directive 7111.1, VT Directive 10240.3 VT Directive 10240.4,, any other applicable policy issuances, along with those from their immediate supervisor.

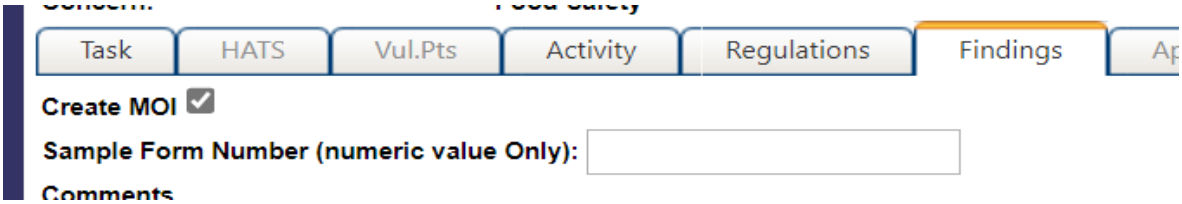
V. IPP RESPONSIBILITIES

PHIS step by step entry for the RTE questionnaire.

A) Open a directed RTE task at the selected establishment and in the drop down select Supervisory instruction. (see below)



B) Once the task is open you will go to the findings tab and “create a MOI”. (see below), remember to hit save to generate the MOI. Then on the next screen in the top left corner you will click add MOI.



C) in the subject line for the MOI add the following. This will make streamlined for Greg when he is performing his PHRE to find the questionnaires.

D) Copy and paste the questionnaire above into the MOI and document the establishments responses. Once completed please remember to finalize the MOI.

E. IPP are to notify their supervisor when the task has already been completed for the assigned performance period, but IPP subsequently observe vulnerabilities in the food safety system that may result in increased food safety risks and these observations change the information in the most recently completed questionnaire. In such cases IPP are to add and complete directed RTE Questionnaire as instructed by their supervisor.

D. IPP are to review the Products page of the Establishment Profile by scheduling the next routine Update Establishment Profile task or by scheduling a directed Update Establishment Profile task if the monthly routine task has already been completed in the month when this notice publishes:

1. In the Product Groups tab on the Products page, IPP are to verify that the Finished Product Category, Average Daily Volume (LB), and Days of Production/Month data fields are entered accurately with the Active box selected for any RTE products currently produced by the establishment;

2. When there is a change in Product Groups, or other parameters as identified in FSIS Directive 5300.1, IPP are to make that update in the establishment profile as soon the change occurs. For example, if the establishment is not currently producing a specific RTE Product Group, IPP are to uncheck the Active box. Conversely, if the establishment resumes production of a specific RTE Product Group, IPP are to check the Active box. IPP can access a PHISHelp tutorial here: Mark a Product Group Active or Inactive; and

3. IPP are only to delete products if the establishment notifies IPP that the products will no longer be produced in the establishment on any shift.

F. IPP are to observe the conditions in the establishment during routine Sanitation Performance Standards (SPS) tasks and use these observations, and any documented noncompliance, to inform the questionnaire responses. Specifically, IPP are to observe routine traffic flow of products, equipment, machinery, and personnel to verify if the establishment always maintains separation between RTE and Raw areas. This sanitation can be achieved by time or space, but IPP are to carefully evaluate if the separation is effective and consult their supervisor if there is a concern. IPP are to observe overhead structures, walkways, automated/robotic machinery, conveyors, chains, sanitation crews, trash

disposal, and maintenance to consider if these areas are the source of insanitary conditions or cross contamination.

G. IPP are to observe RTE operations and compare their observations to establishment programs to inform questionnaire responses and verify that the establishment has identified all possible post-lethality Food Contact Surfaces (FCSs) for sampling as required in 9 CFR 430.4(b)(2)(iii)(D) and 9 CFR 430.4(b)(3)(i)(D) and using the instructions in FSIS Directive 10240.4. A list of common FCSs is included in Attachment 2. As indicated in FSIS Directive 10240.4:

1. IPP are to be aware that an establishment using Alternative 2b or 3 is required to identify and sample all possible post-lethality FCSs; however, the establishment is not required to sample them at the same frequency. The establishment may sample the sites based on risk, although all sites should be sampled over time; and

2. If the establishment has not identified all possible FCSs for sampling, IPP are to evaluate whether the establishment can provide supporting documentation to show why the product or FCS would not be contaminated. If the establishment has not identified all possible FCSs and can't support that the other sites would not be contaminated, then the establishment would not be in compliance with 9 CFR 430.4(b)(2)(iii)(A) or 9 CFR 430.4(b)(3)(i)(A), and IPP are to issue an NR.

H. If physical plant modification has occurred in the last week in the interior production and packaging areas, as indicated in VT Directive 10240.4, IPP are to verify:

1. That the establishment controls sanitation during physical plant modifications so that product does not become contaminated; and

2. That the establishment increases verification sampling in response to physical plant modifications or other conditions that could increase risk in the establishment.

I. If the establishment does not control *Lm* during physical plant modifications or does not increase its verification sampling in response to the modifications, IPP are to issue an NR (cite only pertinent regulations, which may include 9 CFR 416.12(a), 9 CFR 416.13, 9 CFR 416.14, 9 CFR 430.4(b), and 9 CFR 430.4(c)(3)).

J. When answering the RTE Questionnaire questions regarding establishment testing, IPP are to be aware that presumptive positive results for *Listeria spp*. Are considered to be positive. For ANY samples the establishment collects and analyzes, IPP are to enter the total number of sample results received in the questionnaire box. These results may originate from single samples, aggregate samples, or pooled samples, as possible examples, but the focus is on the results reported by the establishment testing. The results may be for *Listeria spp*., *Lm*, or a combination of both *Listeria spp*. and *Lm*. IPP are to report the total number and results for whatever organism is reported in the establishment sample results for their *Listeria* sampling program.

K. If the establishment has *Listeria spp.* positive test results on a FCS, as indicated in VT Directive 10240.4, IPP are to verify the establishment takes corrective actions using a scheduled Hazard Analysis and Critical Control Point (HACCP) Verification task or Sanitation Standard Operating Procedure (Sanitation SOP) task if they have one scheduled for that day. Alternatively, if no HACCP Verification task or Sanitation SOP task is scheduled for that day, IPP are to schedule a directed HACCP Verification task or Sanitation SOP task to verify the establishment takes corrective actions.

NOTE: Establishments that use a screen test for *Listeria* spp. for FCSs or product are not required to culturally confirm the presence of *Lm.* A finding of *Listeria spp*. by an establishment on a FCS indicates conditions where *Lm* may be present, but the product is not considered adulterated. However, establishments are required to take corrective action, according to their *Listeria* control alternative (defined in VT Directive 10240.4,), to address *Listeria spp.* positives so that product does not become adulterated.

L. If the establishment has *Listeria spp.* positive test results in a product, as indicated in VT Directive 10240.4, it may be determined that the product is adulterated because the product was produced under insanitary conditions or the establishment cannot demonstrate the product is not positive for *Lm*. A finding of *Listeria spp.* in the product can indicate that the Sanitation SOP is inadequate or that corrective actions taken in response to a previous sanitation failure may not be effective to prevent product contamination. IPP are to review the establishment's documentation in response to the positive *Listeria spp*. result to determine whether it can support that the product is not adulterated. This documentation may include testing data demonstrating that the original isolate is not positive for *Lm*, or documentation showing that the product has been reprocessed using a process validated to achieve at least a 5-log reduction in *Lm*.

M. If the establishment tests for *Lm* and receives positive *Lm* FCS or product results, IPP are to verify the establishment takes corrective actions under 9 CFR 417.3(a) or 9 CFR 417.3(b).

N. When IPP document SPS NRs, including but not limited to any of the examples from the questionnaire, such as roof leak, condensation, rust/peeling paint, standing water/puddling/pooling/backed up drains, cracked floors, cracked walls, damaged equipment, footbaths/foamers, pre-operational, operational, or other sanitation issues, they are to follow the instructions in VT Directive 5000.1 Chapter V, Section III. Documentation of SPS Verification Results including:

1. If an establishment has not complied with a SPS regulation, but product is not directly contaminated, IPP need to determine whether the noncompliance requires a regulatory control action to prevent contamination or adulteration of product; and

2. If there is an imminent probability that the noncompliance will result in product adulteration if not addressed immediately, IPP are to take a regulatory control action such as retaining product or rejecting equipment and complete an NR.

O. After documenting noncompliance with SPS or Sanitation SOP regulations, IPP are to follow the instructions in VT Directive 5000.1, Chapter V, Section VII. Trends of Noncompliance including:

1. Consider whether the noncompliance is associated with previous noncompliances at that establishment; and

    2. Associate two or more NRs when they indicate an ongoing trend of related noncompliances or systemic problems with the establishment's food safety system.

EXAMPLE: IPP documented noncompliance with 9 CFR 416.13(b) this week at Establishment A when they observed condensation dripping from the ceiling onto product in the processing room. Upon reviewing the NR history prior to the weekly meeting, IPP noted another noncompliance with 9 CFR 416.13(b) last week that also documented condensation dripping onto product in the same area. After reviewing the establishment's proposed preventive measures from the previous noncompliance, IPP find that the establishment did not implement their proposal to add another ventilation fan in the area. IPP concluded that the establishment failed to implement the preventive measures resulting in the recurrence, so they associate the two NRs.

P. IPP are to notify their supervisor immediately if concerns arise, including but not limited to when the answer to any of the questions indicates vulnerabilities in the food safety system that may result in increased food safety risks, as instructed in FSIS Directive 5000.1. IPP are to continue to follow the instructions for RTE product in in VT Directive 5000.1, VT Directive 5000.4, , VT Directive 5000.5, FSIS Directive 7111.1, VT Directive 10240.3 VT Directive 10240.4,, any other applicable policy issuances, along with those from their immediate supervisor.

VI. SUPERVISORY PERSONNEL RESPONSIBILITIES

A. Supervisors are to inform IPP of their availability to assist if IPP have questions or concerns while completing the RTE Questionnaire. The supervisor is to play a key role in ensuring that accurate decisions are made by IPP completing the questionnaires and tasks.

B. Supervisors are to routinely review task completion reports to monitor RTE Questionnaire completion for each establishment to ensure that these tasks are performed in a timely and complete manner and as instructed in this notice.

C. Supervisors are to verify that IPP are following the instructions in Section V. IPP Responsibilities of this notice.

D. The Supervisor is to follow the instructions in VT Directive 5000.1, including Chapter V, Section VII. Trends of Noncompliance to determine whether IPP are correctly identifying and documenting any trends of noncompliance and whether a Food Safety Assessment (FSA) should be recommended.

VII. DO RESPONSIBILITIES

A. Each week the Office is to evaluate the report generated based on IPP completion of the RTE questionnaire.

B. The Office is to consider whether the establishment has had an increased frequency of *Listeria spp*. or *Lm* positives through its own testing.

C. In addition to Sanitation SOP and SPS noncompliances in RTE Post-Lethality Exposed (PLE) areas, the following responses would indicate an increased risk for *Lm* contamination:

—. Use of high pressure hoses;

—. No positive air pressure movement or air flow out of the RTE room into the Raw or other processing areas then to outside;

—. No separation between Raw and RTE products;

—. No separation between equipment, personnel, and tools for Raw and RTE, PLE processing areas;

—. No color coding for equipment in production areas; or

—. No identification to maintain separation between equipment, personnel, and tools for Raw and RTE PLE production areas.

—.

D. When the Office becomes aware that an establishment may be associated with an increased risk of producing product of public health concern, they are to consider options for taking immediate action. Next steps could include conducting a Public Health Risk Evaluation (PHRE) as described in FSIS Directive 5100.4, *Public Health Risk Evaluation Methodology*, conducting a FSA as described in FSIS Directive 5100.1, *Food Safety Assessment Methodology*, or taking other actions as appropriate for the situation as described in FSIS Directive 5100.3, *Administrative Enforcement Action Decision-Making and Methodology*.

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

Katherine McNamara, DVM
Assistant State Veterinarian
VT Agency of Agriculture, Food and Markets

Attachment 1

One-Time Physical Plant Modification Profile Questionnaire Questions:

1. In what year was the establishment built? Enter date physical plant modifications were completed (enter date as MM/DD/YYYY)

2. In what year did FSIS production/processing begin in this establishment? Enter date (enter date as MM/DD/YYYY)

3. In the time since the original building construction, have any production areas (areas within the official premises for production of inspected products) been modified? (Yes/No)

   If No: Next Question If Yes: 3a: Enter most recent date production areas were modified (enter date in MM/DD/YYYY)

Weekly RTE Questionnaire Task Questions:

1. Has any physical plant modification occurred on the premises within the last week? (Yes/No)

   If No: Next Question

   If Yes: 1a: What areas of the establishment were part of the physical plant modifications in the last week? (select all that apply to the most recent physical plant modifications)

   - □ Exterior of the buildings/outside premises-no interior/indoor production area directly involved
   - □ FSIS Raw product production area
   - □ FSIS RTE product production area
   - □ FSIS product production area for HACCP category products other than Raw or RTE
   - □ FSIS product ingredients, packaging materials, or other product-handling or processing equipment storage areas □ FDA/non-FSIS production areas □ Interior Non-production related area (for example, an office)

2. Have there been any physical plant modifications involving the INTERIOR of the building, indoor spaces/rooms in the last week? Consider the below list when answering (Yes/No)

- Equipment (including addition, removal or repair, relocation)
- Opening of structure (including floor drilling, opening wall drywall, holes in the ceiling, roof repair)
- Resurface (including sanding/sandblasting anywhere)
- Surface patch/paint/wax/caulk/tar
- Plumbing (including drains, pipes, pipe insulation)
- Asbestos mitigation

• Other physical plant modifications with interior involvement If No: Next Question If Yes: 2a:

What was part of the physical plant modifications in the last week? (select all that apply o the most recent interior physical plant modifications)

□ Equipment (including addition, removal or repair, relocation) □ Opening of structure (including floor drilling, opening wall drywall, holes in the ceiling, roof repair) □ Resurface (including sanding/sandblasting anywhere) □ Surface patch/paint/wax/caulk/tar □ Plumbing (including drains, pipes, pipe insulation) □ Asbestos mitigation □ Other physical plant modifications with interior involvement

If Yes: 2b: How well is the area where physical plant modifications are being performed kept isolated from the production areas of the establishment? (select one)

□ Completely isolated □ Somewhat isolated □ Not at all isolated

1. Does the establishment use high pressure hoses to clean in Ready-to-Eat, post lethality exposed (PLE) areas at any time, including during preoperational sanitation or during production shifts? (Yes/No)

2. Select the items/procedures the establishment uses/implements during production of RTE products. (select all that apply)

□ Separate dedicated equipment, personnel, and tools for RTE, PLE processing areas □ Color coding for equipment in production areas □ Other form of identification to maintain separation between equipment, personnel, and tools for Raw and RTE production areas □ Separation of Raw and RTE products by space, without a physical barrier □ Separation of Raw and RTE products by time with implementation of sanitation procedures in between □ The establishment does not use any of these

5. In the last week, were any NRs documented in this establishment citing Sanitation Performance Standards or Sanitation Standard Operating Procedures issues (this includes any 9 CFR part 416 regulations) for observations IN THE RTE PLE AREAS OF THE ESTABLISHMENT: (Yes/No)

If No: Next Question

If Yes: 5a: Select the total number of NRs in the last week documented in this establishment citing Sanitation Performance Standards or Sanitation Standard Operating Procedures issues (this includes any 9 CFR part 416 regulations) for observations IN THE RTE, PLE AREAS OF THE ESTABLISHMENT: (select one that applies)

□ 0 □ 1 □ 2-3 □ 4-5 □ 6+

If Yes: 5b: Select the observations related to the NRs documented in this establishment citing Sanitation Performance Standards or Sanitation Standard Operating Procedures issues (this includes any 9 CFR part 416 regulations) IN THE RTE PLE AREAS OF THE ESTABLISHMENT: (select all that apply to the NRs documented)

□ Roof leak □ Condensation □ Rust/peeling paint □ Standing water/puddling/pooling/backed up drains □ Cracked floors □ Cracked walls □ Damaged equipment □ Footbaths/foamers □ Pre-operational □ Operational □ Other sanitation issues

1. Does the routine traffic flow of products, equipment, machinery, and personnel always maintain separation between RTE and Raw areas? (Yes/No)

2. Does the establishment implement measures to direct air flow FROM RTE TO Raw and FROM Raw TO outside (or from RTE TO outside or TO other processing areas then TO outside if no Raw processing)? (Yes/No)

3. Does the establishment use filtration devices on air entering the RTE areas? (Yes/No)

4. Did the establishment collect and analyze non-food contact surface (non-FCS) samples in the RTE PLE areas for *Listeria spp*. or for *Listeria monocytogenes* (*Lm*) or both? (Yes/No)

   If No: Next Question

   If Yes: 9a: Which one did the establishment collect and analyze? (Select one)

   □ *Listeria spp*. only □ *Lm* only □ Both

10. If the establishment collected and analyzed non-food contact surface (non-FCS) samples for *Listeria spp*. or for *Listeria monocytogenes* (*Lm*) or both in RTE PLE areas in the last week, please select Collected to enter the number of samples collected and the total positive. Select one (Not collected, Collected)

    □ Not collected □ Collected

    If Not Collected: Next question

    If Collected: 10a: How many results were received by the establishment (both positive and negative) in the last week that the establishment collected and submitted for analysis? Enter total (free text, enter whole number)

If Collected: 10b: How many of the results received by the establishment in the last week from samples collected and submitted for analysis from RTE PLE areas **were positive** (presumptive or confirmed)? Enter total (free text, enter whole number) 11. Did the establishment collect and analyze food contact surface (FCS) samples in RTE PLE areas in the last week for *Listeria spp*. or for *Lm* or for both? (Yes/No)

   If No: Next Question

   If Yes: 11a: Which one did the establishment collect and analyze? (Select one)

   □ *Listeria spp*. only □ *Lm* only □ Both

12. If the establishment collected and analyzed FCS samples for *Listeria spp*. or for *Listeria monocytogenes* (*Lm*) or both in RTE PLE areas in the last week, please select Collected to enter the number of samples collected and the total positive. Select one

□ Not collected
□ Collected

If Not collected: Next question

If Collected: 12a: How many results were received by the establishment (both positive and negative) in the last week that the establishment collected and submitted for analysis? Enter total (free text, enter whole number)

If Collected: 12b: How many of the results received by the establishment in the last week from samples collected and submitted for analysis from RTE PLE areas **were positive** (presumptive or confirmed)? Enter total (free text, enter whole number)

1. Are there any food contact surfaces (FCSs) that the establishment has missed or left out of their FCS sampling? Including but not limited to brines, solutions, racks, baskets, employee hands, and other surfaces that contact product directly. (Yes/No)

2. Did the establishment collect and analyze product samples in the last week for *Listeria spp*. or for *Lm* or for both? (Yes/No)

   If No: Next Question

   If Yes: 14a: Which one did the establishment collect and analyze? (Select one)

   □ *Listeria spp*. only □ *Lm* only □ Both

15. If the establishment collected and analyzed product samples for *Listeria spp*. or for *Listeria monocytogenes* (*Lm*) or both in the last week, please select Collected to enter the number of samples collected and the total positive. Select one (Not collected, Collected)

    □ Not collected
    □ Collected

    If Not collected: next question

    If Collected: 15a: How many results were received by the establishment (both positive and negative) in the last week that the establishment collected and submitted for analysis? Enter total (free text, enter whole number)

    If Collected15b: How many of the results received by the establishment in the last week from samples collected and submitted for analysis of product **were positive** (presumptive or confirmed)? Enter total (free text, enter whole number)

16. Does the establishment use microbial testing to monitor sanitation process control (including, but not limited to, ATP (Adenosine triphosphate), APC (Aerobic plate count), and indicator organisms other than *Listeria spp*.)? (Yes/No)

    If No: End Questionnaire

    If Yes: 16a: In the last week have any process control testing results (including, but not limited to, ATP (Adenosine triphosphate), APC (Aerobic plate count), and indicator organisms other than *Listeria*

spp.), based on the criteria incorporated into the establishment's written programs, indicated that established criteria were not met? (Yes/No)

If Yes: 16b: In the last week has the establishment taken any corrective actions as a result of process control test results received? (Yes/No)

Attachment 2

The below table provides examples of possible Food Contact Surfaces (FCS) and non-Food Contact Surfaces (non-FCS) sites. The below list is not all-inclusive. FCS and non-FCS are defined as follows:

Food Contact Surface (FCS): An area in the post-lethality processing environment that comes in direct contact with post-lethality exposed RTE product (see FSIS Directive 10240.4).

Non-Food Contact Surface (non-FCS): An area that does not contact product. Non-FCS samples may be collected from any area where RTE product is held in the establishment (e.g., coolers, freezers, loading docks, and trucks). Non-FCS samples may also be collected in areas associated with post-lethality processing, such as equipment storage and washrooms, spice rooms, and ingredient rooms.

Table of Possible Food Contact and Non-Food Contact Sampling Sites Food Contact	**Non-Food Contact**
Aprons*	Air blower, filter
Areas near SPS noncompliances	Areas of construction or where repairs are made
Areas of equipment under dripping condensation	Areas of employee foot traffic from Raw to RTE
Areas where meat particles or residue are found at pre-op	Areas where insects, rodents, or birds are found
Baggers	Boots
Bags	Broken flooring
Band saws	Carts
Baskets	Ceilings
Belts	Chain
Bins	Chain collection box
Blades	Clogged drains
Bowls	Coat racks
Brine*	Condensation
Chiller shelving	Control buttons
Chiller water	Coolers
Chutes	Cooling units
Coats*	Doors
Containers	Door jambs
Conveyors	Drains
Cutting boards	Electrical boxes
Employee sleeves	Equipment framework
Equipment surfaces	Equipment over products
Equipment shields*	Equipment sides
Equipment where maintenance is performed	Equipment that moves from Raw to RTE
Film wrap	Exposed insulation
Gloves*	Fans
Grinders	Flaking/bubbling paint
Guiding bars	Flaps
Hopper surface	Floor mats
Knives	Floor cracks
Mixers	Floor/wall junctions
Packaging machines	Floors
Packaging materials	Forklifts
Paddles	Gaps between close-fitting parts
Pans	Gaskets
Peelers	Handle
Plastic wrap	Hoist
Plates	Hoses

Product carts	Keypads
Racks	Legs (hollow)
Rods	Lifters

Rusted equipment	Loose caulking
Saw table	Machinery
Scales	Maintenance Tools
Scissors	Moldy areas
Scoops	Mops
Scrapers	Motor housing units
Sealers	Oven smokehouse exit
Shredder	Overhead pipes
Slicers	Overhead surfaces
Smoke sticks	Pallet jack
Soaker pads	Pallets
Tables	Pass through window
Tanks	Platforms
Thermometers	Racks
Tongs	Refrigeration units
Totes	Roller bars (hollow)
Trays	Roof leaks
Trees	Rough welds
Tubs	Sinks
Utensils	Spiral Freezer
Wipers	Standing water

Squeegees
Standing water
Stands
Switches
Trash cans
Walkways
Walls
Wheels of carts

*Could be considered either a food contact surface (FCS) or a non-food contact surface (non-FCS), depending on if the surface comes in direct contact with the product.