

**TEXAS DEPARTMENT OF STATE HEALTH SERVICES
MEAT SAFETY ASSURANCE UNIT
AUSTIN, TEXAS**

MSA DIRECTIVE	5100.13	09/22/2020
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**VERIFICATION OF ESTABLISHMENT CORRECTIVE ACTIONS(S) IN
RESPONSE TO A FOOD SAFETY ASSESSMENT (FSA)**

CHAPTER I – General

I. PURPOSE

This directive provides instructions to inspection personnel on how to document and communicate Corrective Action verification after a Food Safety Assessment (FSA)

II. Cancellation
NA

Chapter II – Timelines for Response

I. Corrective actions and Closed Verification Plans

Establishments must complete and implement corrective actions for all findings within 60 days of the exit meeting. Establishments must complete corrective actions for Major and Critical findings in accordance with the timeline stated in the FSA letter provided to the establishment. Failure to implement acceptable corrective actions as documented by the Circuit Manager may result in escalated enforcement action(s).

Chapter III– Verification Plan (VP)

I. Inspector in Charge (IIC) Verification of Establishment’s Corrective Measures

- A. The IIC is to regularly update via e-mail to the CM, the results of the activities he or she has conducted under the VP. The corrective action that the establishment has implemented for each finding shall be documented on the VP by the IIC.
- B. During the weekly meeting, the IIC shall perform a Memorandum of Interview (MOI) with plant management discussing the progress of the verification plan,

documenting findings that are completed and findings that do not have implemented corrective actions.

- C. The IIC has the flexibility to increase the frequency of the verification activities based on her/his findings and should notify the CM if they do so.
- D. IIC shall describe the corrective actions that the establishment has implemented by documenting them in the VP for each finding and the date the corrective action was completed/implemented.
 - 1. For changes made to the written procedures, the exact verbiage the establishment used is preferred when possible.
 - 2. For recordkeeping findings, a description of the establishment's measures(s) to prevent recurrence of record keeping errors and/or comments explaining what changes were made to forms, logs, etc. are preferred.
- E. When the IIC completes the VP, or when the applicable time frame described in the letter to the establishment that is prepared with the final report expires, the IIC shall email the completed VP to the CM for review.
- F. The IIC, through the CM, through the EIAO Manager, may request that the EIAO conduct a follow-up visit to an establishment that has had an enforcement action deferred or is under a suspension action that is held in abeyance to determine the overall effectiveness of the establishment's corrective measures.

NOTE: The level of description provided in the Verification Plan determines the level of confidence in the corrective actions meeting regulatory requirements.

II. Circuit Manager Verification of Establishment's Corrective Measures

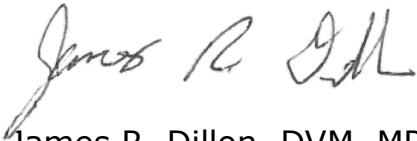
- A. On at least a monthly basis, the CM or Acting CM is to conduct a meeting with inspection staff and establishment management discussing the progress of the verification plan. The meeting should be documented in a MOI entered in PHIS by the CM.
- B. Upon submission of the completed VP by the IIC, the CM is to arrange a time with the IIC to verify implementation of the documented corrective actions through an on-site assessment at the establishment. If the CM concurs with the IIC that the establishment has implemented all corrective actions as documented in the VP by the IIC, the CM is to

request the VP be closed and forward the completed VP to the EIAO for review.

NOTE: The EIAO will plan a return visit to the establishment to verify acceptable Corrective Measures when the establishment was issued a LOW, NOIE, or Withholding/Suspension. If the EIAO has concerns about Corrective Measures on a LOC they may plan a return visit to verify those. Recommendations made by the EIAO may include continuing to hold the action in abeyance, closing the action, or initiating further enforcement in the event the establishment's corrective or preventive actions are found not to be effective.

CHAPTER IV – QUESTIONS

Refer questions through supervisory channels.

A handwritten signature in black ink, appearing to read "James R. Dillon". The signature is written in a cursive style with a large initial "J" and "D".

James R. Dillon, DVM, MPH
Director, Texas State Meat and Poultry Inspection Program Department of State
Health Services