

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

<h1>MSA DIRECTIVE</h1>	5010.1 Rev. 2	4/17/14
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**FOOD SAFETY RELATED TOPICS FOR DISCUSSION
DURING WEEKLY MEETINGS WITH ESTABLISHMENT MANAGEMENT**

I. PURPOSE

This directive provides instructions to inspection program personnel (IPP) to discuss topics at the weekly meeting with establishment management that are pertinent to an establishment's food safety system and that could affect public health. To assist IPP, this directive provides a general list of food safety related topics that they should consider for discussion during weekly meetings.

NOTE: For the purposes of this directive, use of the term, "establishment" will refer to meat and poultry establishments.

KEY POINTS:

- Describes the [purpose](#) of the weekly meeting
- Provides a list of possible [topics](#) of discussion
- Addresses the preparation of the [Memorandum of Interview](#) (MOI)
- Addresses the responsibilities of [Supervisory Personnel](#)

II. REASON FOR REISSUANCE

This directive is being reissued to include information related to conducting weekly meetings in establishments operating under the Public Health Inspection System (PHIS), to include as possible topics for discussion during the weekly meeting: 1) establishment pathogen test results and 2) issues of concern to establishments also under Food and Drug Administration (FDA) jurisdiction; to update information links and modify Section VII regarding the preparation of the Memorandum of Interview (MOI); and to add a section addressing Supervisory responsibilities.

III. WEEKLY MEETING

- A. The purpose of the weekly meeting is to provide an opportunity for IPP to bring matters that bear on the establishment's on-going compliance with MSA requirements to the attention of establishment management. These meetings should benefit both IPP and the establishment. However, discussion of issues during the weekly meeting is not intended to replace documentation of noncompliance. Moreover, the fact that an issue is not discussed at the weekly meeting does not mean that the issue could not become the subject of a noncompliance record.

- B. As set out in MSA Directive 5000.1, *Verifying an Establishment's Food Safety System* IPP are to conduct weekly meetings with establishment management to discuss topics that could affect food safety and the establishment's ability to meet regulatory requirements.
- C. A wide variety of topics can be discussed at the meetings, including individual noncompliances and developing trends of noncompliance. They are an opportunity for establishments to share information regarding their operations, such as facility improvements and changes to their food safety systems. Weekly meetings also afford MSA an opportunity to inform establishments of topics of discussion that could include findings that are not regulatory noncompliances (e.g., less than perfect conditions) but that could, over time, become noncompliances.
- D. In addition, there can be discussion of information from external sources, such as customer or consumer complaints, that can provide information to alert establishment management about a safety risk or about other information that is relevant to the establishment's food safety system.
- E. The following list provides some example topics that IPP may discuss at the weekly meeting. The list is not comprehensive and is not intended to act as a checklist. More importantly, IPP, are to communicate with the establishment about any topics that relate to food safety and that could affect public health.

Possible topics for discussion include:

1. In-plant observations, including, but not limited to:
 - a. Individual Noncompliance Records (NR);
 - b. Developing trends of noncompliance (e.g., discuss any identified associations between current and past noncompliances);
 - c. MSA findings that do not rise to the level of noncompliance but that warrant discussion (e.g., less than perfect conditions that may, if not addressed, become noncompliances);
 - d. Humane handling issues, including those that do not rise to the level of noncompliance but warrant discussion;
 - e. Issues related to the implementation and verification of Less Than Daily Sanitation procedures; and
 - f. Potential Food Security issues
2. Issues of concern and information that the establishment wishes to share;
3. Agency issuances, for example, but not limited to:
 - a. Policy clarifications;
 - b. New, revised, or amended Directives, Notices and FSIS Compliance Guides; and
 - c. Small and very small plant outreach information

4. Information regarding sampling:
 - a. Results received;
 - b. Changes to Products and Product Volumes in the Plant Profile;
 - c. Notification that Routine Risk Based *Listeria monocytogenes* (RLm) and Intensified Verification Testing (IVT) testing will be conducted as a result of a positive *Listeria monocytogenes* sample in Ready- to-Eat product.
5. Information related to the establishment's food safety system, for example, but not limited, to:
 - a. Establishment testing results, observed in accordance with the instructions in MSA Directive 5000.2, *Review of Establishment Testing Data by Inspection Program Personnel*, that indicate possible changes (e.g., an increase in the presence of enteric pathogens of human health concern such as *Listeria* spp., *Salmonella* spp., *E. coli* O157:H7, or *Campylobacter*);
 - b. Implementation of, and changes to, any of the establishment's prerequisite programs (e.g., Allergen controls, Specified Risk Materials, Certificates of Analysis) that are in place to support food safety decisions;
 - c. Changes to the establishment's food safety or production practices, including changes to the product line, processing methods used, product flow, sanitation measures, equipment configuration, or treatment of product, that could impact the establishment's food safety system;
 - d. Changes in in-plant regulatory waivers or new technology trials; and
 - e. Changes to facility or equipment.
6. Information from external sources such as:
 - a. Complaints from consumers or establishment customers (e.g., institutions such as hospitals or nursing homes, restaurants, schools, grocery stores, distributors, or wholesalers), if available; and
 - b. Current Recalls, including those that have involved product received by the establishment, product similar to product produced by the establishment, or product held for re-inspection by FSIS at an import establishment. Further areas for discussion may include:
 - i. Any establishment testing of products;
 - ii. Any planned actions associated with the recalled product that has been received by the establishment; and
 - iii. Discussion with plant management regarding how it can use information from recalls of products similar to those produced at the establishment as a mechanism to improve its own operation.
7. Discussion of issues related to changes in operating schedules.

IV. PREPARING THE MEMORANDUM OF INTERVIEW (MOI)

- A. The MSA employee who attends the weekly meeting is to take notes of the meeting and is to document those notes in a Memorandum of Interview (MOI) in accordance with the instructions in MSA Directive 5000.1.

NOTE: In the event that no issues are identified for discussion at the weekly meeting, IPP are to document that fact on the MOI and provide a copy of the MOI to establishment management.

- B. Establishment management is not obligated by regulation to attend or participate in weekly meetings. If, after notification by IPP that MSA will be conducting weekly meetings at a mutually agreed to time and location, plant management refuses to attend or to participate, IPP are to document that fact on the MOI and provide a copy of the MOI to plant management. IPP are also to notify their immediate supervisor of the establishment's decision not to meet.

NOTE: If the need arises, IPP are to work with establishment management to reschedule the meeting so that it is mutually convenient to both MSA and plant management.

- C. IPP are to provide a copy of the MOI to the establishment management and are to maintain a copy, either electronically in PHIS or the government file.
- D. IPP are to advise the establishment that if it objects to the content of the MOI, it may document its concerns or disagreement in several ways, specifically;
 - 1. Through PHIS. If the establishment chooses to use PHIS, IPP are to advise establishment management that information regarding how to access PHIS is available in the Establishment Management User Guide , Section 3.1.1.2, Plant Management: How to respond to a Memorandum of Interview (pages 25-28)
 - 2. By informing the inspector, either orally or in writing. If the objection is presented orally, IPP are to document the objection on the MOI, or if presented in writing, IPP are to attach the objections to the MOI. IPP are to reference the attachment in the MOI and provide a copy to plant management; or
 - 3. Establishment management can also elect to bring their objections to the attention of other agency officials in the supervisory chain.

V. SUPERVISORY PERSONNEL RESPONSIBILITIES

NOTE: For the purposes of this directive, "Supervisory Personnel" refers to any personnel who have supervisory responsibilities of in-plant IPP.

- A. The supervisory personnel play a key role in ensuring that decisions made by IPP are consistent with MSA statutory authority and Agency policy, and that duties are performed in accordance with the information and procedures addressed in this directive.
- B. Supervisory personnel are to discuss the key points identified in this directive with IPP and are to clarify any issues of concern.
- C. Supervisory personnel are to ensure that IPP are:

1. Conducting the weekly meetings in accordance with the instructions in MSA Directive 5000.1.
2. Addressing relevant issues such as those listed in this directive; and
3. Properly documenting the meeting in an MOI. Supervisory personnel are to review the MOIs when they become available.

VI. QUESTIONS

Questions regarding this Notice shall be directed to the MSA Central Office through the supervisory chain-of-command.

A handwritten signature in black ink, appearing to read "Dr. Johnson", written in a cursive style.

Dr. Howard C. "Butch" Johnson, DVM, MS, DACVPM
Director, Texas State Meat and Poultry Inspection Program
Department of State Health Services