



by Melissa Vaccaro, MS, CHO

# Is Your Plan Working?



## Do you have a large manual that sits on your desk or bookshelf and collects dust? Is it your HACCP plan?

HACCP (Hazard Analysis Critical Control Point) is a systematic approach to identifying, evaluating, and controlling food safety hazards. It represents an important tool in food protection that managers can use to achieve Active Managerial Control of risk factors in their facility. But the plan not only needs to be written and implemented, it must be verified and validated occasionally to be sure it's still accurate and working.

During inspections of retail food facilities, when I ask about a HACCP plan the manager often goes to their office and pulls a big 2-inch thick manual off their bookshelf and hands it to me, then proceeds to show me the various log sheets used throughout the facility. The plan is written and in some cases the plan is even being implemented. When I ask when the plan was last verified or validated, I frequently get blank stares or 'headquarters will send us any changes or updates.' This tells me the HACCP plan might be outdated and may not even be followed correctly from day to day, which automatically makes me wonder about the safety of the food being prepared.

If all you do is log temperatures, cooking temperatures, note any corrective action and other daily monitoring and you never stop to verify and review the plan, you will never know if your plan is working adequately.

Over time you will simply have an out of control HACCP plan. Verification is the bigger picture of your HACCP plan...is the plan working? Verification is making sure that food employees are performing the activities described in your HACCP plan. It will help strengthen your plan and ensure safe food.

Verification should not be confused with Principle #4, monitoring of a HACCP plan. Monitoring is the act of observing and making measurements to help determine if critical control points are being met and maintained at all times. In HACCP Principle #6, monitoring procedures are verified.

Let's review the 7 Principles of HACCP:

1. Conduct a Hazard Analysis
2. Determine Critical Control Points (CCPs)
3. Establish Critical Limits
4. Establish Monitoring Procedures
5. Establish Corrective Actions
6. Establish Verification Procedures
7. Establish Record-Keeping and Documentation Procedures

Principle #6 of the HACCP plan should clearly spell out:

- Who is responsible for verification procedures
- The frequency of the various verification activities
- The procedures and forms used for verification

Who should perform the verification activities? Verification of a HACCP plan is usually conducted by someone other than the person who is directly responsible for performing the activities specified in the plan. That should make sense—a second set of eyes. It might be a manager, supervisor, external auditor, or regulatory authority, but it should be someone who could effect change should deviations be noted. If internally done, verification activities should be part of someone's job description.

How often should verifications of a HACCP plan be done? This will vary. Verification is conducted frequently, such as daily, weekly, or monthly to ensure that the plan is being followed *continuously*. You need to verify often enough that you can ensure unsafe food is not reaching the customer, corrective actions are taken that could prevent loss of food, personnel practices are followed, and all CCPs are under control. Documents should be kept as part of HACCP Principle #7, record keeping. The more often you verify, the quicker you are aware of a problem should one be found, and the faster you can respond to the issue. Responding fast will assure no compromised food reaches customers.

Verification activities may include:

- Observing if employees are carrying out critical procedures (those associated with a CCP) correctly.

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- Verifying that the employee is doing the monitoring as required and as prescribed.
- Reviewing records, such as log sheets, to determine if they are filled out accurately and correctly.
- Verifying if the records show that the frequency of monitoring is occurring as required.
- Ensuring that corrective actions were taken when the person monitoring found and recorded that critical limits were not being met.
- Confirming that all equipment is working properly, including that used for monitoring, and that it's operating, maintained, and properly calibrated.

**“ ” Active, continual, and consistent verification** of a HACCP plan by management will ensure that Active Managerial Control is in place in your facility on a daily basis. It will force you to pull that HACCP plan off the shelf regularly.

Validation of a plan is different than verification of a plan. The verification activities described above are done to determine whether HACCP procedures are being executed as laid out in the HACCP plan (i.e., whether you are doing what you said you would do). Validation, however, is done to establish whether the plan is working to control the significant hazards (i.e., whether you are doing the right things). Validation is a component of verification, but it focuses on collecting and evaluating scientific and technical information to determine if the HACCP plan, when properly implemented, will control identified hazards. More specifically, validation is done to determine if the hazard analysis is still appropriate and realistic, is controlling hazards, and is based on current science.

## Answers to FPC Review Questions

CDMs who answer the FPC Review Questions on page 15 of this issue can check their responses against the answer key found on page 39. This “self check” allows you to confirm your understanding of the test questions.

Unlike verification, validation involves re-examining the hazard analysis, CCPs, CLs, monitoring activities, and other aspects of the HACCP plan to assure that the proper hazards are identified and are being controlled. Validation occurs much less often, yearly in most cases, and is typically done at the corporate office, by general managers, owners, or by third party auditors. An example of validation might be comparing your current HACCP plan with the current Food Code. Does your plan need updating to meet any new criteria of the code? Is your HACCP plan current with today's science? If not, the plan needs updating and employees must be informed of those updates through training.



Active, continual, and consistent verification of a HACCP plan by management will ensure that Active Managerial Control is in place in your facility on a daily basis. It will force you to pull that plan off the shelf regularly. In the hustle and bustle of foodservice operations, verification of the plan is often forgotten, overlooked, or pushed aside. As a manager of a food facility, don't assume everything is running smoothly every day, or that all employees are implementing the HACCP plan as required. You must verify frequently. Do not forget this important step in your overall HACCP plan. ☺

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