



FURTHER PROCESSING MONITORING PROGRAM

Purpose

This document establishes policy for the monitoring of commodity further processing into finished products for use in the National School Lunch Program. In some situations, when commodity product is received directly from the supplier to be processed into an end item, there is little change to the physical characteristics of the original commodity product. For example, a commodity product may be received to be sliced and placed in sandwiches, or the commodity may be repacked as part of a finished product, such as a meal kit, or a “pre-plated” item. In these examples neither reformulation nor any cooking processes, which could alter the nature of the commodity, are performed.

Full-time grading coverage may not be necessary to ensure non-substitution and non-diversion of donated food in such operations. The Further Processing Monitoring Program (FPMP) has been developed and is offered to facilities performing these types of processes, and who meet the criteria contained in this guidance document.

Approval to participate in the FPMP allows a processor to identify cases of finished commodity product with a USDA stamp. The FPMP stamp assures the recipient agency that their product was processed, packaged, and handled according to specifications, in accordance with this program. The issuance of an AMS Reprocessing Certificate covering all commodity product processed, allows the processor to account for the value of the Donated Food contained in each case of finished product, and report it directly to the recipient agency on their Monthly Performance Report.



The following guidelines apply to approving and monitoring documented quality control system used by the processor when participating in the FPMP. A “quality control system” (QC system) is defined as a document which details all the policies, practices, and procedures employed at a single facility in order to produce one or more commodity products according to the FPMP requirements.

Authority

The FPMP is provided in accordance with these guidelines; criteria based on Good Manufacturing Practices; the Regulations Governing the Voluntary Grading of Poultry Products and Rabbit Products (7 CFR Part 70); the United States Classes, Standards, and Grades for Poultry (AMS 70.200); and the Quality Assessment Division (QAD) Policies and Procedures. In addition, Food and Nutrition Service (FNS) regulations (CFR 7, Part 250.30, Subpart C) require all processing of donated meat products be performed under Agricultural Marketing Service



(AMS) certification service. The QAD policy is to ensure USDA donated products are properly handled, processed according to specifications, traceable to domestic origin, and not diverted for commercial use.

Scope

Only facilities involved in the conversion of bulk pack donated commodity red meat and poultry into finished end items (known as “further processing”), on behalf of eligible recipient agencies, are eligible for this program. The original commodity product must originate from a federally inspected facility (FSIS) and have been certified by AMS either under the bulk pack commodity purchase program, or under previous further processing according to an End Product Data Schedule (EPDS).

Only product(s) identified by name and code in the QC system document, and for which an End Product Data Schedule has been approved by the National Supervisor, is eligible for identification with the USDA “FPMP” stamp under this program. Additional products are subject to the approval process and may be incorporated upon satisfactory completion of an addendum to the original submission, and approval of the EPDS(s).

I. General

Processors who are eligible to participate in the FPMP must apply in writing to the National Supervisor. The written application must include the quality control system documentation detailing all products and production processes the processor plans to include in the program. To identify products with the USDA FPMP stamp, each of the grading and verification categories listed under Section II. E, as applicable, must be performed by plant quality assurance personnel, as outlined in the processor’s documented QC Program.

The company will develop a quality control system listing the categories and subcategories in section II.E, and to what criteria they will monitor each category/subcategory for each product produced under the program. The quality control system will be developed in accordance with the FPMP guidelines (Section II. E. 1-7) and shall be submitted to the National Supervisor for review and approval. Approval for participation in FPMP will be granted upon successful development of the quality control system and final review of the policies and procedures established by the processor. Subsequent revisions to the quality control system must be submitted through the QAD Supervisor and approved by the National Supervisor prior to implementation of the revised process.

All further processed commodity product(s) to be identified with the USDA FPMP stamp shall be examined by a QAD Supervisor quarterly (Section III. B.), through physical observation of the processing of the product(s), and examination of the processor’s quality control records.

II. Processors Responsibility

A. Quality Control (QC) Managers and Employees



The processor shall appoint a Quality Control (QC) Manager who shall ensure that the quality control system is maintained in accordance with these specifications and serve as a liaison with the QAD on matters relating to the FPMP. Additionally, plant management must provide the USDA grader with a letter certifying that all QC employees performing authorized verification activities have received adequate training and understand their duties and responsibilities under this program.

A “QC employee,” or “QC,” means any designated company employee, other than the plant owner, manager, foreman, or supervisor, authorized to examine product and to supervise the production, processing, labeling, and other functions of commodity products. The QC employee’s primary function is to ensure that all USDA and/or State requirements are met and only product that complies is officially identified.

Product which is, or shall be, identified under this program cannot be packed in any plant without an authorized plant QC on duty to sample or inspect the product during reprocessing.

B. Responsibilities

Duties of each employee/position as they relate to the quality control system shall be outlined in the document submitted to the National Office. Duties may include, but are not limited to: product sampling and control, weighing, temperature verification, fabrication, packing and packaging, storage, retention and control, and monitoring rework of retained product.

C. Facility Requirements

All facilities and equipment used by plant QC employees for sampling and assessing product must meet requirements of the QAD 600 series certification criteria.

D. Procedures

All sampling levels, frequencies, tolerances, guidelines and procedures used in the quality control system must be equivalent to, or more stringent than, current USDA-AMS standards, policies and procedures as they relate to grading and certification.

E. Criteria Monitored Through the Plant Quality Control System

The following categories and subcategories should be included in the program documentation, as applicable. The same level of verification will apply to all products.

- 1) Processing and Fabrication
 - a. Incoming Weight Verification
 - b. Product Formulation
 - c. Production Procedures



- 2) Finished Product
 - a. Portion Control
 - b. Case Weight
 - c. Physical Characteristics

- 3) Metal Detection

- 4) Packing and Packaging
 - a. Labeling
 - b. Container integrity
 - c. Piece count

- 5) Temperature requirements
 - a. Raw
 - b. Cooked

- 6) Chilled product temperature

- 7) Storage requirements
 - a. Temperature

F. Tolerances

All defect tolerances, weight, and temperature limits shall be equal to, or more stringent than, established standards listed in the QAD 600 Series. Once the acceptable criteria are established, the company must document in the quality control system how they will be monitored at each identified quality control point. For example, this may include work instructions posted at quality control points to facilitate understanding by the responsible person(s).

G. Product Control

The company shall identify and document what corrective actions will be taken when tolerances are exceeded and product retention occurs. These actions must ensure that non-complying product will be withheld from shipment under this program, until it is reworked and found to be compliant. Retention procedures are predetermined and must be implemented every time the tolerance is exceeded. Alternatively, the affected product may be diverted to a commercial outlet, provided the USDA FPMP stamp and any other official identification are removed from the packaging and/or packing material; the affected product is not eligible for reporting under this program. This action may also require removal of the product number code or other identifiable means in order to prevent the affected product from being marketed under the FPMP.

Procedures for handling the reworking of retained products shall be documented in the quality control system guidelines. The guidelines and procedures must ensure that reworked product is



handled properly and will not result in non-complying product being officially identified and/or shipped.

H. Equipment

The company must describe and identify the type of equipment, materials, and/or solutions used to monitor quality control points. For example, the types of thermometers for temperature monitoring and the scales for weight determination shall be included in the quality control system. The company shall establish and maintain documented procedures to control, calibrate, and maintain all inspection, measuring, and test equipment used to demonstrate the conformance of product to the specified requirements.

I. Records

The company shall identify and include in the quality control system all records that will be completed and maintained in order to demonstrate compliance with the program tolerances. Existing quality control worksheets may be used if they contain all of the information necessary to perform the quality checks and assure compliance according to the requirements of the FPMP. Worksheets must contain a form number and current edition date. Copies of the forms must be submitted to the National Supervisor as part of the quality control system documentation and completed forms shall be provided to the USDA grader for review upon request. Quality control records shall be maintained for one year after the close of the Government fiscal year (October 1 through September 30) in which they were created.

Production records of applicable products shall be maintained by the plant on a daily basis. Production figures of each product shall be provided to the grader for review upon request.

III. AMS Responsibilities

A. Quality Control System Approval

A copy of the processor's quality control system shall be submitted to the National Supervisor. The National Supervisor will review the documentation and request changes, clarifications, deletions, etc., as necessary.

Review and approval of the quality control system will be based on comprehensiveness of the document and effectiveness of the proposed program. The plant's quality control system documentation will be returned to the appropriate Regional Director after review and approval.

Revisions made to the quality control system after approval of the FPMP program must be approved by the National Supervisor prior to implementation. Copies of approved revisions to the quality control system must be supplied to the Supervising office prior to implementation of the revised procedure.



B. Responsibilities of the QAD Supervisor

The QAD Supervisor or their designee is responsible for reviewing and maintaining a copy of the quality control system used at the facility. FPMP reviews will be conducted quarterly (approximately every 3 months) until the facility has met three consecutive satisfactory ratings. Once the facility has obtained three satisfactory ratings, the facility may have “Reduced” reviews conducted semi-annually (approximately every 6 months).

The Supervisor verification of a processor’s records must assure that adequate samples are taken by the QC personnel, and that samples are properly identified, numbered, and appropriately spaced, and that adequate control of product is maintained by the plant. The QAD Supervisor will verify these items through a verification of the worksheets prepared by the QC personnel for each requirement monitored by the plant. The worksheets shall be reviewed for proper entry of information, compliance with tolerances, time of checks, and any retention information.

1) Noncompliance

Any noncompliance noted during the verification shall be addressed immediately. Product failing to meet requirements shall be placed under retention until the product is brought into compliance with requirements. If product is not in compliance, the QAD Supervisor shall contact the Regional Director immediately, who will then discuss with the National Supervisor to determine what corrective action is to be taken.

Additionally, corrective actions must be documented and performed by the plant to prevent any future occurrences. A copy of the corrective action is to be provided to the QAD Supervisor at the time of the review.

The QAD Supervisor shall advise the Regional Office regarding any discrepancies that could compromise the integrity of the FPMP. Deficiencies that affect the continuity of the program must be discussed between the Regional Director and the processor’s QC manager. A follow-up letter outlining this discussion is to be provided with copies to the Supervisor and the Regional and National offices.

2) Recordkeeping

USDA review of QC verification checks and worksheets shall be documented as outlined in the instructions to the QAD Supervisor.

Production records shall be provided to the QAD Supervisor by the plant, on a monthly basis in order to issue official certification, ex. LP-240. Certificate issuance for product processed under the FPMP will be accomplished according to the instructions applicable to that program.



IV. Approval to Participate in FPMP

Processors wishing to participate in the FPMP shall submit a copy of their quality control system, along with the End Product Data Schedule (EPDS) for each commodity product, to:

National Supervisor, Poultry
USDA, AMS, Quality Assessment Division
1400 Independence Avenue, SW Stop 0258
Washington, D.C. 20250

(202) 690-3166 Phone
(202) 690-2746 Fax

Upon receipt of the documents, the National Supervisor will either approve the processor to participate, or advise the processor on necessary changes in order to receive approval for the pilot. Once approval is received, the processor may run for a one-year period, at the end of which the FPMP will be evaluated and any necessary modifications will be made prior to continuation of the program.

V. Termination of FPMP

The FPMP may be terminated at any time by plant management upon written or verbal notice to the QAD supervisor. If voluntarily terminated at plant management's request, they may request reinstatement of the program within six months of the termination date. Approval of reinstatement will be at the discretion of the National Supervisor and the Regional Director.

FPMP programs may be terminated by USDA for infractions which indicate a lack of control by the plant. Such infractions include, but are not limited to:

- 1) Failure to make QC personnel available as needed to meet minimum online sampling requirements.
- 2) Interference or attempts by plant management or other personnel to influence QC personnel in the performance of their duties.
- 3) Repeated instances where officially identified product is packed and not adequately sampled by the QC personnel.
- 4) Repeated instances where officially identified product packed under QC supervision fails to meet requirements when verified by USDA.
- 5) Lack of control and/or monitoring of non-compliant product.
- 6) Falsification of Records (Results in immediate termination of the program with no eligibility to reinstate).



Upon determination by the QAD Supervisor that sufficient evidence exists to terminate a FPMP program, the National Supervisor is to notify the plant in writing. The letter will state the specific reason(s) for the termination. Depending on the seriousness of the situation, verbal notice may be given of the immediate termination of the program. Termination action shall not be taken without the concurrence of the Regional Director.

Richard H. Lawson, National Poultry Supervisor
Quality Assessment Division
Livestock and Poultry Program

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