

Master FSIS NR Writing

Print Version

January 20, 2011

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Module

A

Noncompliance Record Writing Process Overview

Welcome

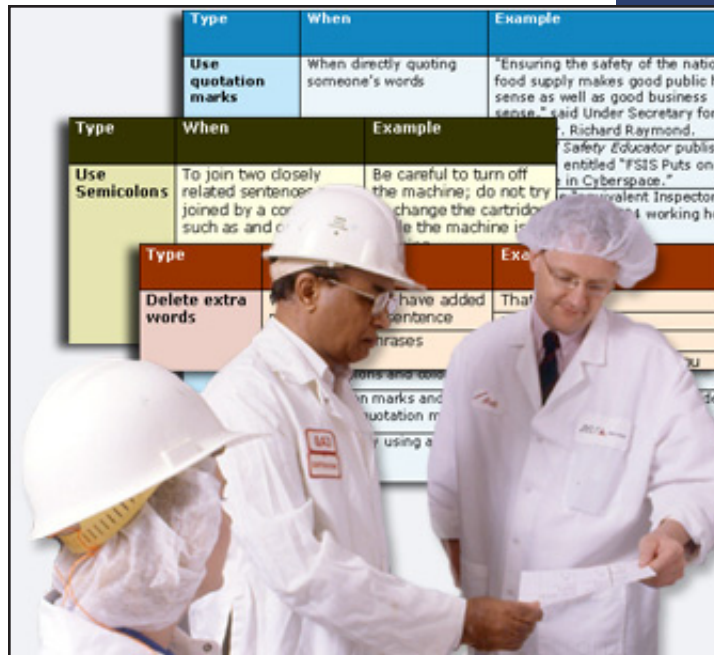
Welcome to the *Master FSIS NR Writing* training.

Food Safety Inspection Service (FSIS) personnel generate Noncompliance Records (NRs) to document noncompliance in federally inspected establishments. Poor documentation can have legal implications and impact public health and safety.

The *Master FSIS NR Writing* training provides step by step directions, practice, and resources to guide inspectors in writing accurate NRs.

By the end of this training you will be able to:

- ◆ Access appropriate resources
- ◆ Follow established procedures
- ◆ Demonstrate the writing skills used to effectively document an establishment's noncompliance





Master NR Writing

Introduction

The *Noncompliance Record Writing Process Overview* module reviews FSIS published documents that outline the policy, procedures and responsibilities for FSIS Inspection personnel involved in the NR writing process.

By the end of this module you will be able to:

- ◆ Access and review relevant FSIS published resources
- ◆ Reference the correct FSIS procedures for issuing a NR

The *Noncompliance Record Writing Process Overview* module contains the following topics:

- ◆ Overview
- ◆ Considerations for Issuing the NR
- ◆ Required Information
- ◆ Establishment, Inspector, FLS, and EIAO Responsibilities
- ◆ Directive 5000.1
- ◆ Noncompliance Record Writing Process Overview Check-Up

Overview

Food Safety Inspection Service (FSIS) personnel, including Consumer Safety Inspectors (CSIs) and Public Health Veterinarians (PHVs) enforce the Federal Meat Inspection Act (FMIA), Poultry Products Inspection Act (PPIA), and the Egg Products Inspection Act (EPIA) regulations to ensure the nation's commercial supply of meat, poultry, and egg products is safe, wholesome, and correctly labeled and packaged. Compliance with these laws is essential for protecting public health and safety.

The NR is the primary tool used by in-plant inspection personnel for documenting a noncompliance. The description should clearly explain how the inspector's findings support the determination that the establishment did not meet regulatory requirements.

This training covers two skill-sets necessary for writing an effective NR:

1. The ability of in-plant inspection personnel to document regulatory noncompliance by including the following in a NR:
 - The type of regulatory noncompliance using accurate and applicable regulatory citation(s)
 - The establishment's failure to follow its written HACCP and SSOP Plan
 - Failure to meet Sanitation Performance Standards (SPS)
 - NR associations
 - Documented trends
2. The ability to use proper grammar, spelling and punctuation

Considerations for Issuing the NR



Issue a NR to an establishment when it fails to comply with one or more regulatory requirements.

As soon as a noncompliance is observed, immediate corrective action must be taken to isolate or control the noncompliance event; including any regulatory control actions if insanitary conditions or adulterated

products exist. A NR should then be written as soon as possible after observing the noncompliance. When writing the NR, be descriptive, specific, and thorough. Issue a copy of the NR to the plant manager before the end of your shift.

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Remember, you must:

- ◆ Identify each noncompliance and describe the problem using clear and concise language
- ◆ Cite the specific regulation(s) with which the establishment has failed to comply
 - Including violation(s) linked to HACCP plans, SSOP, or SPS controls
- ◆ Provide documentation that the establishment's management has received adequate oral and/or written notification
- ◆ Detail any regulatory control actions taken and if US Retain/Reject Tag issued, include:
 - Tag number
 - Approximate weight
 - Lot designation of any retained product

Be sure to include:

- ◆ Time and location
- ◆ Inspection findings with a description of how the noncompliance affects the product(s)
- ◆ Previous unsuccessful corrective actions
- ◆ Applicable deadlines
- ◆ Any adulterated or misbranded product(s) resulting from the noncompliance
- ◆ Any product affected by the noncompliance that entered commerce

If a previous noncompliance has been addressed, include:

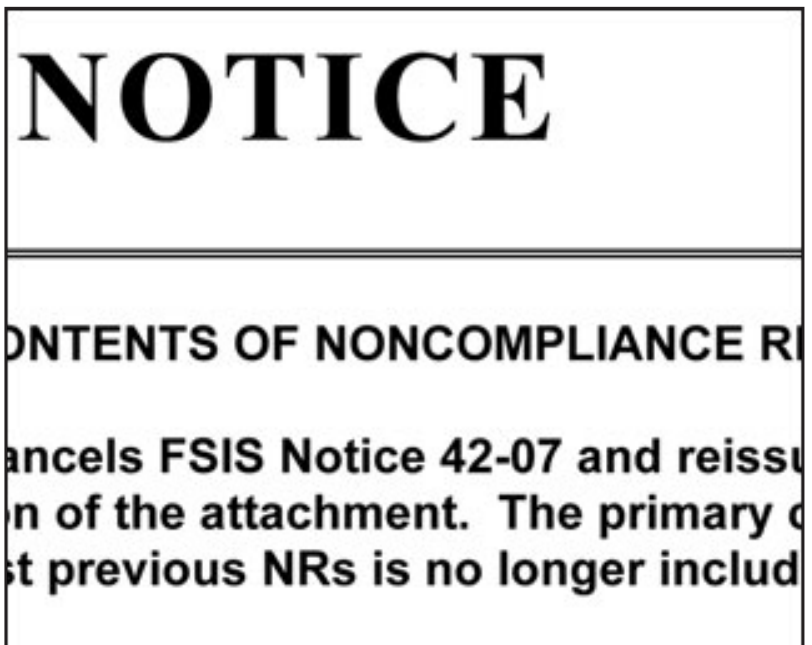
- ◆ Developing trends of noncompliance and if it has been discussed with the establishment management
- ◆ The number of the previous NR with the same cause and any description of how the NR derived from the same cause
- ◆ Any unsuccessful, further planned actions taken by the establishment to address the noncompliance

- ◆ A statement whether they have discussed the developing trend of noncompliance with establishment management

Inspection personnel should document the identified trend in the meeting notes feature of PHIS for discussion at the next meeting with establishment management. PHIS allows inspection personnel to review recent similar NRs and select one or more NRs associated to the new NR. When documenting a developing trend of noncompliance, inspection personnel are to include the statement: *“Continued failure to meet these regulatory requirements may result in additional regulatory or administrative action”* in both the NR text and the Memorandum of Interview (MOI).

Associating NRs

If a NR is written that has the same root cause as a previous one, the NRs should be associated. Good judgment is necessary when determining which NRs to associate together.





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Some factors to consider are:

- ◆ Was this noncompliance from the same cause as the previous NR?
- ◆ How much time has lapsed since the previous NR was written?
- ◆ Were the establishment's further planned actions implemented?
- ◆ If so, were these effective in reducing the frequency of these noncompliances?
- ◆ Is the establishment continuing to implement additional (better) further planned actions?

When you associate one NR to another, you should document:

- ◆ The previous NR number and date.
- ◆ The further planned action that was ineffective in preventing recurrence of the noncompliance.
- ◆ Any discussion with plant management during the weekly meeting, concerning the trend.
- ◆ A statement in Block 10 of the NR stating that continued failure to meet regulatory requirements can lead to enforcement actions as described in 9 CFR 500.4 (p. 654).

NRs should be associated as they are issued and to previous noncompliance. NRs that derive from the same cause should be continuously associated together until the noncompliance is resolved or it is determined enforcement action is necessary. For some examples of when to associate NRs, see the NR Associations Job Aid in Appendix A (p. 56).

Establishment, Inspector, FLS, and EIAO Responsibilities

Noncompliance can be significant from a sanitation or public health perspective. The table outlines Establishment, Consumer Safety Inspector (CSI), Front-Line-Supervisor (FLS), and Enforcement Investigation and Analysis Officer (EIAO) responsibilities for ensuring compliance.

Note: If the establishment finds a noncompliance and takes appropriate corrective action, a NR does not need to be written.

Responsibilities	
Establishment	Maintains regulatory compliance with its written, signed and dated HACCP and SSOP plan and SPS regulations.
CSI	According to the Rules of Practice (ROP) and FSIS regulations, inspection personnel who observe a noncompliance should ensure the violation is isolated and/or controlled, ensure any appropriate control actions are taken, and then to write the NR.
FLS	Works with the CSI to ensure documentation is accurate and supports any future enforcement action.
EIAO	Supports the FLS, the CSI or the in-plant supervisor if additional help is needed with the NR or other regulatory control action.



Directive 5000.1

Directive 5000.1, Verifying an Establishment's Food Safety System provides comprehensive direction on how to verify an establishment's compliance with pathogen reduction, sanitation, and Hazard Analysis and Critical Control Point (HACCP) regulations.

Chapter II: Sanitation - details the 9 CFR Part 416 (p. 619-623), which involves the SPS and the Sanitation SOP regulations used to verify each official establishment is operated and maintained in a manner sufficient to prevent the creation of insanitary conditions and to ensure that product is not adulterated.

Chapter III: HACCP - 9 CFR Part 417 (p.623-627) details the establishment responsibility to comply with HACCP regulations and FSIS responsibility to verify that establishments meet those requirements.

Chapter V: Documentation and Enforcement – the most comprehensive in terms of documenting noncompliance and details the procedures for filling out FSIS Form 5400-4, the Noncompliance Record in PHIS, and includes the following components:

- ◆ Filling Out a NR in PHIS
- ◆ Examples of Noncompliance Situations
- ◆ Associating NRs
- ◆ Identifying Trends of Noncompliance
- ◆ Actions and Documentation
- ◆ Documenting Verification Results in PHIS
- ◆ Documenting Noncompliance
- ◆ Documentation of SPS Verification Results
- ◆ Documentation of Sanitation SOP Verification Results
- ◆ Documentation of HACCP Verification Results
- ◆ Documenting Generic *Escherichia coli* (*E. coli*) Verification Results

Rules of Practice: 9 CFR Part 500, Parts 1-3 (p. 653-654) detail the three types of enforcement actions defined in the Agency's Rules of Practice:

- ◆ Regulatory Control Action
- ◆ Withholding Action
- ◆ Suspension



Also outlined in the Rules of Practice section of Directive 5000.1 are the NOIE, Abeyance, Verification Plans, Verification of Corrective Actions, and Analysis of Data.

Refer to Directive 5000.1 for more details. To check for the most recent version of Directive 5000.1, review the updated/revised issuances received via email or check the Directives page on the FSIS Intranet.

Required Information

Each field of the NR in the Public Health Information System (PHIS) requires specific information. Review the enlarged areas of the NR form on the following pages for descriptions of the necessary fields when filling out a NR.



Master NR Writing

Block 7: Title(s) of HACCP or SSOP Plan or Other Supporting Documentation

Enter the section or page of the establishment's procedure or plan when the noncompliance represents the failure to comply with the written provisions of their procedure or plan. For example, if the monitoring frequency listed in the HACCP plan is hourly, and the establishment performs the procedure every two hours, there is monitoring noncompliance. Inspection program personnel record the section or page of the HACCP plan that lists the monitoring frequency. When the noncompliance is not related to a procedure or plan, enter N/A.

7. TITLE(S) OF HACCP OR SSOP PLAN or OTHER SUPPORTING DOCUMENTATION

7a. NAME OF HACCP CCP(S) or PREREQUISITE PROGRAM

8. INSPECTION TYPE

9. VERIFICATION ACTIVITY

Review & Observation

9a. AFFECTED PRODUCT INFORMATION

9b. RETAIN/REJECT TAGS

10. DESCRIPTION OF NONCOMPLIANCE

Verification Activity:

Check the box that describes the type of procedure during which the noncompliance was discovered. Choose from "Review & Observation", "Record Keeping", or "Both". 9a & 9b are optional fields to be used if any affected product is identified and if Retain/Reject tags were issued.

Inspection Type:

The inspection type is populated by the inspector and should match to type of procedure used to discover the noncompliance cited on the NR.

Description of Noncompliance:

Describe each noncompliance in clear, concise terms, including the exact problem, its location, and the effect on product. For example, if the CSI observes condensation dripping from the ceiling onto exposed product, the description should include the area of the plant where the observation was made, what type of product was being contaminated, and the action taken. If there is a trend of noncompliance developing, and the current NR is linked to previous NRs, the CSI should list the previous NRs with the similar noncompliance from the same cause. The NR should state what corrective actions were proposed, and that these actions were ineffective or not implemented. If this developing trend has been discussed with establishment management, this information should also be documented in this block. If more space is needed to describe noncompliances for procedure codes 01B and 01C, inspection program personnel may use a NR Continuation Sheet.

The request for this information is voluntary. It is needed to monitor defects found in this inspection system. It is used by FSIS to determine whether FSIS APPROVED OMB No. 0505-0181 OMB DISCLOSURE STATEMENT Public reporting burden for this collection of information is estimated to average 15 minutes per response, including reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Department of Agriculture, Clearance Office, 1416 Information and Regulatory Affairs, Office of Management and Budget.

US Department of Agriculture
FOOD SAFETY AND INSPECTION SERVICE
NONCOMPLIANCE RECORD

TYPE OF NONCOMPLIANCE
 Food Safety

1. DATE 2. RECORD NO. 3. ESTABLISHMENT NO.

4. TO (Name and Title)

6. RELEVANT REGULATIONS

7. TITLE(S) OF HACCP OR SSOP PLAN or OTHER DOCUMENTATION

8. INSPECTION TYPE 9. VERIFICATION ACTIVITY
 Review & Observation

9a. AFFECTED PRODUCT INFORMATION
9b. RETAIN/REJECT TAGS

10. DESCRIPTION OF NONCOMPLIANCE

11. NAME OF PREREQUISITE PROGRAM

You are hereby advised of your right to appeal this decision.

13. APPEAL STATUS Not under appeal

14. PLANT MANAGEMENT RESPONSE (Immediate)

15. PLANT MANAGEMENT RESPONSE (further planned action(s))

This document serves as written notification that your failure to comply with regulatory requirements(s) could result in additional regulatory or administrative action.

16. SIGNATURE OF PLANT MANAGEMENT 17. DATE

18. VERIFICATION SIGNATURE OF INSPECTION PROGRAM EMPLOYEE 19. DATE

FSIS FORM 5400-4 DISTRIBUTION: Original & 1 Copy to Establishment, 1 Copy to Inspector
Page 1 Of 1



Master NR Writing

Noncompliance Record Writing Process Overview Check-up



Read the question and then write your answer in the “Answer” space provided. When you have answered the question, compare it to the answer key located in Appendix B (p. 66).

1. What is the FSIS primary tool for documenting noncompliance in establishments? 1. _____
 - a) Documentation of the relationship between the noncompliance and specific regulations
 - b) Planned actions outlined in the establishment’s SSOP
 - c) The ability to observe a situation objectively
 - d) The noncompliance record (NR)

2. “Time and location, inspection findings, previous unsuccessful corrective actions, applicable deadlines, establishment response to a previous notification and any applicable regulatory control actions taken,” represents all of the information you must: 2. _____
 - a) Keep written down in case you have to appear before a review board
 - b) Keep in your records should the NR come up for appeal in the future
 - c) Be sure to include when documenting the facts for any NR
 - d) None of the above

3. When writing a NR for more than one noncompliance, you must _____ 3. _____
 - a) Identify at least one noncompliance using clear and concise language
 - b) Identify each noncompliance using clear and concise language
 - c) At least make sure you refer to the noncompliance somewhere in the NR
 - d) Determine if the noncompliance was intentional or accidental



Read each responsibility description in the column to the left and then write the matching name from the list in the “Answers” column on the right. When you have matched all of the questions, compare your answers to the answer key located in Appendix B (p. 66).

CSI	FLS	Answers:
EIAO	Establishment	
1. Will support the FLS, the CSI or the in-plant supervisor if additional help is needed with the NR or other regulatory control action.		1. _____
2. Will work with the CSI to ensure documentation is accurate and supports any future enforcement action.		2. _____
3. According to the Rules of Practice (ROP) and FSIS regulations, inspection personnel who observe a noncompliance must ensure the violation is isolated and/or controlled and any appropriate control actions are taken and then to write the NR.		3. _____
4. Maintains regulatory compliance with its written, signed and dated HACCP and SSOP plan and SPS regulations.		4. _____



Module Completed

Congratulations! You have completed the
Noncompliance Record Writing Process Overview
Module.





Module

B Impact of Noncompliance Record Writing

Impact of Noncompliance Record Writing

The *Impact of Noncompliance Record Writing* module illustrates the process flow for writing an effective NR and provides examples of the potential impact of both correctly and incorrectly written NRs. By the end of this lesson you will be able to:

- ◆ Identify the overall flow of steps involved in the NR writing lifecycle
- ◆ Determine both the positive and negative impact from examples of correctly and incorrectly written Noncompliance Reports



The following topics are covered in this module:

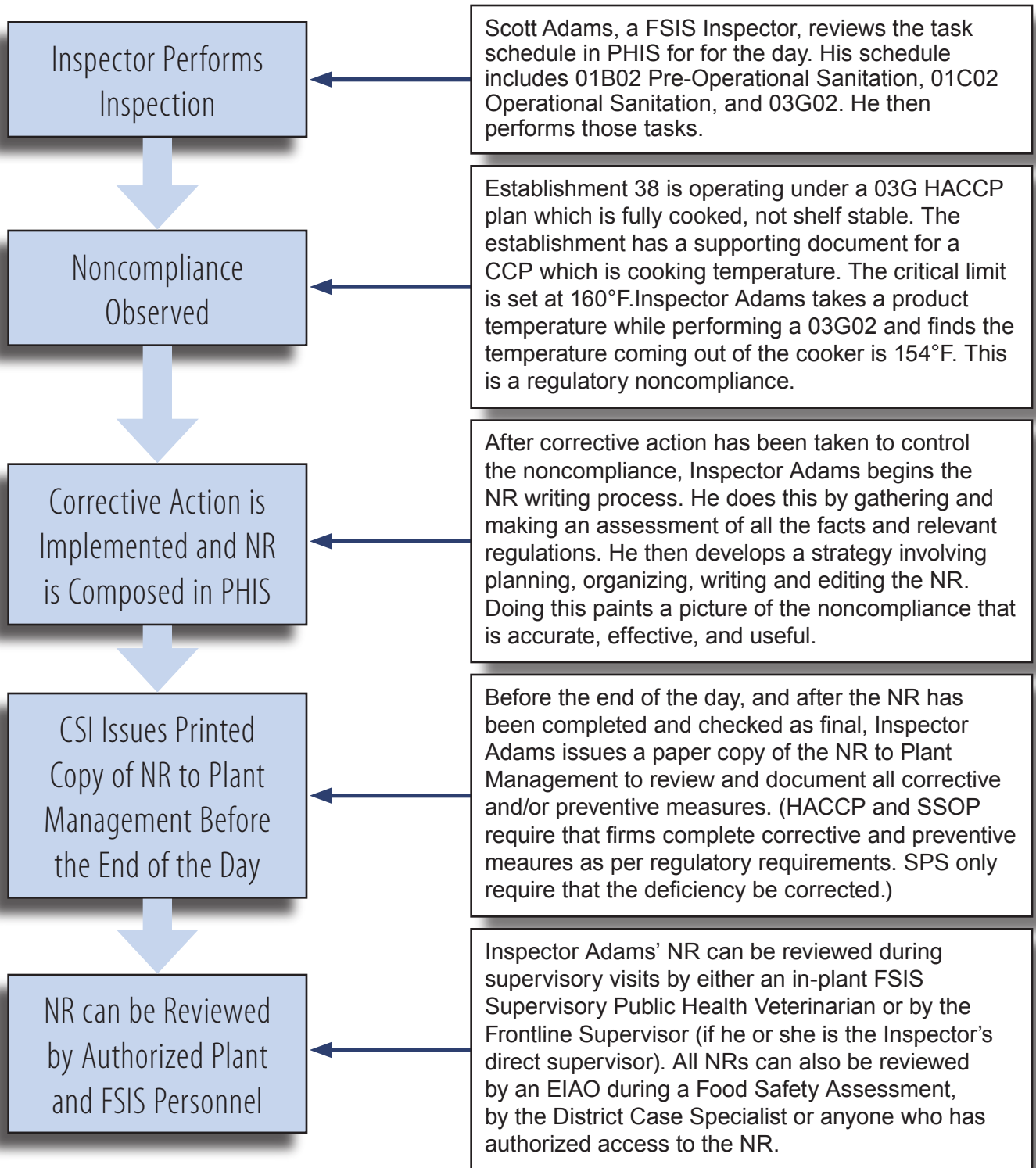
- ◆ NR Writing Lifecycle Flowchart
- ◆ NR Writing Lifecycle Flowchart Check-up
- ◆ Impact of NR Writing
- ◆ Positives and Negatives
- ◆ Berry Meats Noncompliance
- ◆ Positive Scenario
- ◆ Negative Scenario
- ◆ Scenario Check-up

Master NR Writing



NR Writing Lifecycle Flowchart

The NR Writing Lifecycle Flowchart illustrates the lifecycle of a noncompliance record.





Master NR Writing

NR Writing Lifecycle Flowchart Check-up



Read each step in the column to the left and then correctly order them 1 – 5 of the lifecycle flow of a noncompliance record. When you have matched all of the questions, compare your answers to the answer key located in Appendix B (p. 67).

Steps:

Corrective action is taken to control the noncompliance and then the NR is composed in PHIS	1. _____
The NR is supported and reviewed by the FLS or if needed, other authorized personnel such as the EIAO	2. _____
CSI Performs Inspection	3. _____
A noncompliance is observed	4. _____
CSI or PHV gives copy of NR to Plant Management	5. _____

Master NR Writing

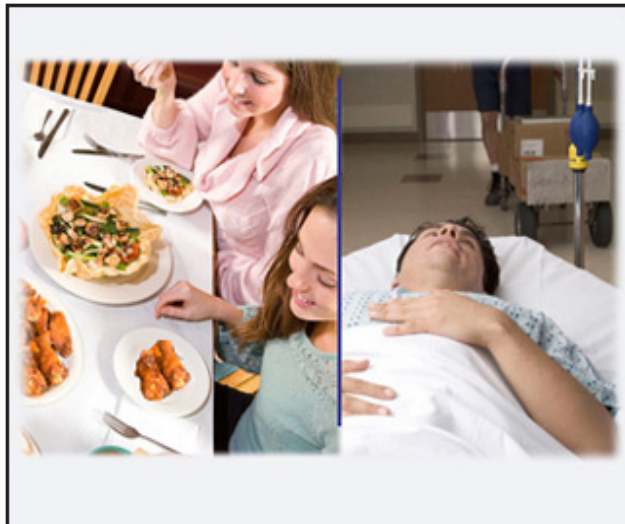


Impact of NR Writing

The impact of your NR may be far-reaching.

- ◆ A well-written NR will protect your credibility and can help protect public health and safety.
- ◆ A poorly written NR will jeopardize the credibility of both you and the FSIS and could impact public health and safety.

Your NR should be well thought out. It should be complete, descriptive and contain proper grammar, spelling and punctuation. A poorly written NR may allow dangerous conditions to persist; it may not stand up as a legal document, may not survive an appeal and could hurt both your credibility and that of the FSIS. As you can see, proper documentation is essential.



Positives and Negatives

To determine noncompliance, use only what is known to you as a fact and what is reasonable to conclude. In making a determination, assess your observations, analyze all the facts, and decide which performance standards or regulatory requirements apply. Writing a complete NR can prevent dangerous conditions from persisting at an establishment.



Berry Meats Noncompliance

The following noncompliance occurred at Berry Meats, a very low volume establishment.

Date: July 9, 2007

Establishment: M54321, Berry Meats

Inspector: Eric Copeland

Plant Supervisor: Scott Moore

Plant Owner: Michael Williams

Noncompliance

When FSIS Inspector, Eric Copeland, performed procedure 01E01, he found the *E. coli* testing had started, but had not been continued. When he inquired with Scott Moore, the on-duty supervisor, he was informed that Mr. Moore had begun the testing as required. Mr. Moore had then gone on vacation and the required testing had not been followed through during his absence.

The establishment is required to collect *E. coli* sponging samples at least once per week, starting the first full week of operation after June 1 of each year, and continue sampling at a minimum of once each week the establishment operates until June 1 of the following year or until 13 samples have been collected, whichever comes first.

Mr. Williams disagrees with this event and wants to submit an appeal. After reading the scenario, you will view two NRs, one with a positive outcome and one that results in a negative outcome.

Let's see what happens. Read through the Positive and Negative NRs and consider the two different outcomes.

Master NR Writing



Negative Scenario

In the negative scenario, the appeal was granted and the NR became invalid because it was not filled out correctly. The NR lacked essential information and required documentation to fully capture and describe the noncompliance. The public health and safety is at risk and the FSIS Inspector's credibility is now damaged.

Review each section in the NR to see how each section did not support the NR and why the appeal was granted.

Blocks 1 – 5: The EIAO investigator was not able to identify the title of Mr. Williams or the personnel notified of the noncompliance.

The request for this information is voluntary. It is needed to monitor compliance with the requirements of the Federal Food, Drug, and Cosmetic Act. Establishments are in compliance. 9CFR 301 and 9CFR 381, FORM APPROVED OMB No. 0583-0089 OMB DISCLOSURE STATEMENT: Public reporting burden for the collection of information is estimated to average 7 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Department of Agriculture, Clearance Officer, OIRM, Room 404-W, Washington DC 20250; and to the Office of Information and Regulatory Affairs, Office of Management and Budget.

US Department of Agriculture FOOD SAFETY AND INSPECTION SERVICE NONCOMPLIANCE RECORD		TYPE OF NONCOMPLIANCE <input checked="" type="checkbox"/> Food Safety <input type="checkbox"/> Other Consumer Protection	
1. DATE 08/09/2007	2. RECORD NO. PYJ51385462156N	3. ESTABLISHMENT NO. M98765	
4. TO (Name and Title) Mr. Williams		5. PERSONNEL NOTIFIED Scott	
6. RELEVANT REGULATIONS 310.25		6a. LINKED NR(s)	
7. TITLE(S) OF HACCP OR SSOP PLAN or OTHER SUPPORTING DOCUMENTATION		7a. NAME OF HACCP CODE	
8. INSPECTION TYPE 03J02 - HACCP Slaughter Verification	9. VERIFICATION ACTIVITY <input checked="" type="checkbox"/> Review & Observation <input type="checkbox"/> Record Keeping		
9a. AFFECTED PRODUCT INFORMATION		9b. RETAIN/REJECT TAGS	
10. DESCRIPTION OF NONCOMPLIANCE After completion of the Establishments Pre-operation Inspection, and after the start of operations. A review of testing record indicate that the Establishment did not follow the requirements of 9 CFR 310.25 (b) (7) 5000.1			
12. SIGNATURE OF INSPECTION PROGRAM MANAGER			
You are hereby advised of your right to appeal this decision.			
13. APPEAL STATUS Not under appeal			
14. PLANT MANAGEMENT RESPONSE (If any)			

Blocks 6 – 9: The codes were not correctly documented preventing the NR to be credible by the appeal team. This led to questioning of the inspector's skill in defining and identifying applicable regulations.

Block 10: Failed to describe the event and paint an accurate picture of the circumstances and actions. What time did this event happen? How long had the testing not been completed? Exactly which documents were reviewed? Why is this in violation? These and more questions should have been documented in the description field. Poor spelling and grammar also decreased the inspector's credibility.



Noncompliance Record Writing Process Overview Check-up



Read the question and then write your answer in the “Answer” space provided. When you have answered the question, compare it to the answer key located in Appendix B (p. 67-68).

1. Read the following Block 10 paragraph describing a noncompliance and select the most likely outcome from the choices provided.

1. _____

At approximately 15:30 PM, while performing operational inspection, in the Fabrication Department, Zone #2, Unit 1, Beef Holding Room, the following non-compliance was observed: A small bird was flying around the ceiling area of the Beef Holding Room. The room was rejected with US Reject tag #B4354005. A check of the QA Pest Control Audit showed that no deviations were recorded. There was no product in the room at the time, but the potential for a food safety hazard existed as product normally is stored in this area. Mr. Benjamin, the QA Supervisor was notified of this non-compliance. After the bird was removed, and the Beef Holding Room was cleaned, sanitized and re-inspected, the room was released for production. The establishment failed to meet the requirements of 9-CFR 416.2(b)(3) of the Federal Meat and Poultry Regulations, which states: “Walls, floors, ceilings, doors, windows and other outside openings must be constructed and maintained to prevent the entrance of vermin, such as flies, rats, and mice.” and their own record for operational inspection (dated 5/10/2005) under Beef Holding Room which states:” This area received visual/organoleptic inspection of the floors, walls, and ceiling, and associated Acme Meats equipment by QA personnel and was found acceptable.” Mr. G. Manager was notified both verbally and in writing of the plant’s failure to meet regulatory requirements and the requirements of their own SOP.

- a) The NR is well written and the noncompliance is described so the next required actions are clear.
- b) The NR is well written, includes a clear description and cites appropriate regulations for the noncompliance.
- c) The NR is appealed and the appeal is granted due to the absence of cited regulations and a detailed description of the noncompliance.
- d) The writer’s ability to write an effective NR is so outstanding that his/her FLS asks them to participate in a NR writing training to teach other inspectors how to write effective NRs.
- e) A, B, and D

Master NR Writing



2. Which step in the NR writing lifecycle is not correct? 2. _____
- a) Inspector Performs Inspection
 - b) Plant is found out of compliance
 - c) EIAO is notified of the noncompliance
 - d) Inspector gives copy of NR to Plant Management
 - e) NR is reviewed by authorized personnel
3. Which statement best describes the positive impact of a well-written NR? 3. _____
- a) A well-written NR will protect the credibility of you and FSIS and can help protect public health and safety.
 - b) A well-written NR will ensure an establishment will be shut down without dangerous delays.
 - c) A well-written NR keeps the EIAO happy and increases your chances for a raise or promotion
 - d) A well-written NR may be used as a standard by which all other NRs are held during committee reviews.
4. Writing an incomplete NR can _____ 4. _____
- a) Prevent dangerous conditions from persisting at an establishment
 - b) Ensure the public health and safety is protected
 - c) Prevent retaliation by the establishment in question
 - d) Cause dangerous conditions to persist at an establish and jeopardize public health and safety
5. Which block of information in the NR is most important to ensure dangerous conditions do not persist at an establishment? 5. _____
- a) Blocks 1 – 5
 - b) Blocks 6 – 9
 - c) Block 10
 - d) The entire NR must be completely and accurately filled out using good practical writing skills along with concise, descriptive language.



Master NR Writing

Module Completed

Congratulations! You have completed the *Impact of Noncompliance Record Writing* Module.





Module

C Writing Skills

Practical Writing: Grammar, Punctuation, and Spelling

In terms of practical writing skills, NR descriptions must be clear, concise and specific with regards to regulations. Poor grammar, punctuation and spelling can distract the reader or, in extreme cases, communicate completely different meanings from what's intended. Anytime you write a NR or any official document, proofread your work. In addition to use of a writing strategy, organization and structure, you will be looking for correct use of all the mechanical components involved in good writing.



In this module you will learn to:

- ◆ Identify examples of clear writing and the importance of using correct grammar, punctuation and syntax when writing a Noncompliance Report.

The *Practical Writing: Grammar, Punctuation, and Spelling* module contains the following topics:

- ◆ Verbs and Pronouns
- ◆ Verb Check-up
- ◆ Capitalization
- ◆ Capitalization Check-up
- ◆ Periods
- ◆ Commas
- ◆ Comma Check-up
- ◆ Capitalization, Punctuation, and Subject and Verb Agreement Check-up
- ◆ Apostrophes
- ◆ Apostrophe Check-up
- ◆ Quotation Marks
- ◆ Semicolons
- ◆ Semicolon Check-up
- ◆ Apostrophe, Quotation Mark, and Semicolon Check-up
- ◆ Word Use
- ◆ Word Use Check-up
- ◆ Spelling
- ◆ Proofread
- ◆ Proofreading Check-up
- ◆ Wordiness
- ◆ Wordiness Check-up
- ◆ Active and Passive Voice
- ◆ Active and Passive Voice Check-up
- ◆ Spelling, Word Use, and Wordiness Check-up



Master NR Writing

Verbs and Pronouns

Good grammar is the foundation for constructing clear, understandable sentences. The table contains tips to help you brush up on the basic rules for verbs and pronouns before you write your next NR.

Type	Rule	Sense	Example	Reason	Incorrect
Verb Agreement	Make every verb agree in number with its subject.	If the subject is singular, use a singular verb.	This inspection is complete.	Inspection and is are both singular.	This inspection are complete.
		If the subject is plural, use a plural verb.	These inspections are complete.	Inspections and are are both plural.	These inspections is complete.
Misleading Words or Phrases	Do not be misled by words or phrases that come between the subject and the verb.	If the subject is singular, use a singular verb.	The schedule for the inspectors is ready.	Schedule and is are both singular.	The schedule for the inspectors are ready.
		If the subject is plural, use a plural verb.	Both HACCP and Sanitation SOP are required to be available to FSIS.	HACCP and Sanitation SOP and are are both plural.	Both HACCP and Sanitation SOP is required to be available to FSIS.
Pronouns and Antecedents When a pronoun replaces a noun, an antecedent is the word the pronoun replaces.	A pronoun must agree with its antecedent in number.	If the antecedent is singular, use a singular pronoun.	A set of good working boots is expensive, but it is well worth the money.	Set and is are both singular.	A set of good working boots are expensive, but it is well worth the money.
		If the antecedent is plural, use a plural pronoun.	Inspectors should do their best to request vacation time early.	Inspectors and their are both plural.	Inspectors should do his best to request vacation time early.



Verb Check-up



Read the question and then write your answer in the “Answer” space provided. When you have answered the question, compare it to the answer key located in Appendix B (p. 69).

Answer:

1. Identify which sentence is written with the proper verb agreement. 1. _____
 - a) The Directive 5000.1, the SSOP and the SPS is the foundation for managing and regulating establishment compliance issues.
 - b) Regulation of establishment compliance issues by FSIS is managed using the Directive 5000.1, the SSOP and the SPS.



Master NR Writing

Capitalization

Here are some rules for deciding whether to use lower case or upper case letters in your writing:

Type	Rule	Example
Job Titles	Capitalize specific job titles when they are used with a person's name.	Bob Smith, Vice President
		John Doe, FSIS Inspector
Companies, Departments, Groups	Capitalize names of specific companies, departments, and groups.	Berry Farms
		Human Resources
Special Instructions	Show special instructions to be marked on an item exactly as they will appear.	Mark container "FOR SHIPMENT"
		Label the box "FRESH"
Regions and Compass Directions	Capitalize when east, west, north, and south designate particular geographic regions.	Southwest
		Mid-Atlantic Region
Geographical Names	Capitalize recognized geographic names.	Ohio River
		Gulf of Mexico
Months and Days of the Week	Use initial capitalization.	November
		Thanksgiving
Since capitalization conventions may vary, always consult a dictionary when in doubt. If more than one standard is acceptable, choose one form and use it consistently throughout your writing:		
Time Abbreviations	These can be used interchangeably, but always be consistent.	A.M. / a.m. / AM / am
		P.M. / p.m. / PM / pm
States	All states have a two letter abbreviation that is capitalized and does not include periods.	CA, MT or NY

Capitalization Check-up



Read the questions and then write your answers in the "Answers" column. When you have answered the questions, compare it to the answer key located in Appendix B (p. 69).

Answers:

1. Identify which sentence is written with proper use of capitalization.
 - a) John Baxter heads up our Northern Regional Division.
 - b) Our northern regional division offices are managed out of Cleveland by John Baxter.
2. Identify which sentence is written with the proper use of capitalization.
 - a) The Centipede in Fig. 2 is approximately 4-Inches long.
 - b) The spore cluster in fig. 3 is exactly 1 in. in diameter.

Master NR Writing



Periods

A period indicates a full stop. It is used to end a sentence and should not be used for anything else.

Type	Rule	Example
Use a period	At the end of a request phrased as a question, if the question is asked as a courtesy.	Would you please immediately notify me if the meeting is cancelled.
	Consistently after items in a list... either after each item or after none of the items.	<ol style="list-style-type: none"> 1. Start the PHIS application. 2. Review your schedule. 3. Close the application.
	Outside parentheses if the words enclosed in parentheses are part of a sentence.	Online registration forms are provided (valid email address required).
	Inside parentheses if a complete sentence is contained in parenthesis and stands alone.	Certain FSIS advisories can be found in the current news releases. (Archived transcripts are housed on the portal.)
	Inside closing quotation marks. Exception: Place periods outside quotation marks if the word or words within quotation marks are to be typed or written by the reader exactly as shown.	<p>"Media" is the plural of "medium."</p> <p>Exception: Enter "Version 2.1".</p>
	After abbreviations if the abbreviation spells a word.	<p>Inch is abbreviated to in.</p> <p>Figure is abbreviated to fig.</p> <p>Production is abbreviated to prod.</p>
Do not use a period	In abbreviations of well-known bureaus, agencies, universities, etc.	<p>USDA</p> <p>FSIS</p> <p>OPEER</p>



Master NR Writing

Commas

Commas separate structural elements of a sentence into segments. Well-placed commas allow the reader to immediately understand the relationships of words in sentences.

Rule	Example	Explanation
Commas are always followed by one space.	Scott, are you going to the store?	There is one space after the name Scott.
Do not use a comma between the subject and verb or between the verb and its object.	The Food Safety and Inspection Service introduced the Consumer Safety Officer (CSO) occupational series into its workforce.	"Food Safety and Inspection Service" is the noun, and "introduced" is the verb. It would be incorrect to place a comma between these two.
Use a coordinating conjunction to join closely related sentences.	We can't meet with you on Monday, but we would like to meet with you on Wednesday.	The first part of this sentence, "We can't meet with you on Monday," and the second part of the sentence, "but we would like to meet with you on Wednesday" are closely related in that both sentences are about meeting with someone.
Use a comma to set off most introductory phrases and clauses (phrases and dependent clauses that precede the main sentence).	When a regulatory noncompliance occurs, a NR should be written.	"When a regulatory noncompliance occurs" is an introductory phrase and should be set off with a comma.
To separate a series of adjectives that modify the noun separately	He presented a convincing, well documented noncompliance record.	"Convincing" and "well-documented" are adjectives that modify the noun "record."
To separate items (words, phrases, or clauses) in a series	Always be safe when handling, storing, and preparing eggs and egg products.	"Handling," "storing," and "preparing" are part of a series and should be separated using commas.
Between the day and year in dates when the date is given in month-day-year order	November 12, 1979	Separate "12" and "1979" with a comma.
After the year when the month-day-year date stands within a sentence	The public meeting is scheduled for Monday, March 31, 2008, beginning at noon.	Separate "2008" from the rest of the sentence using a comma.
To set off items in geographical names	Reston, Virginia, USA	Set "Reston," "Virginia," and "USA" apart using a comma.
To set off items in titles	Terra Foods, Inc.	Separate "Inc." from the rest of the title using a comma.

Master NR Writing



Rule	Example	Explanation
When a company uses a comma in their official name, use a comma after Inc. when the name is used in a sentence	Terra Foods, Inc., is opening a new establishment in the Lincoln area.	Since Terra Foods, Inc., uses a comma in their official name, use a comma after "Inc." when writing it in a sentence.
In direct address	Yes, Hank, the meeting is on Tuesday.	The name "Hank" should be set off using commas because he is being directly addressed.
Before and after i.e. (that is) and e.g. (for example) when what follows - the explanation or example - is not a complete sentence	Use the proper mail code, e.g., John Smith D-12.	"John Smith D-12" is not a complete sentence, so use a comma following e.g.
With numbers containing four or more digits (except in decimals, part numbers, etc.)	The budget for 2009 is \$46,123,943.	There are more than 4 digits in the number 46,123,943, so use a comma with the number.

Comma Use Check-up



Read the questions and then write your answers in the "Answers" column. When you have answered the questions, compare it to the answer key located in Appendix B (p. 69).

Answers:

1. Identify which sentence demonstrates proper use of commas. 1. _____
 - a) The Food Safety and Inspection Service is developing a new NR writing course to ensure inspection personnel know how to write an effective noncompliance report.
 - b) When a FSIS inspector observes a noncompliance at an establishment, the first course of action is to notify the establishment's management of the noncompliance and then to write the NR.
2. Always use a comma to break up a long sentence. 2. _____
 - a) True
 - b) False



Capitalization, Punctuation, and Subject and Verb Agreement Check-up

The paragraph below contains eight different mistakes. Read it carefully and then circle the errors. The eight errors consist of:

- ◆ Two examples of incorrect subject and verb agreement
- ◆ Two examples of incorrect capitalization
- ◆ Four examples of incorrect punctuation

When you have answered the questions, compare it to the answer key located in Appendix B (p. 70).

Tonight at 2310 hours I performed ISP Code 06D01, Sanitation Performance Standards (determination of plant compliance with adequate ventilation systems). during this task, I observed noncompliance, in the oven room on cook line # 6. Steam fills the room and produced a thick, opaque vapor which resulted in zero visibility. This circumstance indicated that the ventilation system was not functioning adequately. Ready-to-eat product was being produce on cook lines 5 and 6 at this time so I initiated “Regulatory Control Action” in accordance with Federal Rules of Practice, 9 cfr 500.2. I discontinued the production of product on cook lines 5 and 6 until such time as compliance was restored and a verbal preventative measure was offered, ie, management will investigate further into the culprit of this problem in order to resolve it

Master NR Writing



Apostrophes

Apostrophes are punctuation marks used to denote omissions and possessives of nouns and pronouns. Omissions refer to letters that have been left out, such as the “i” when “where is” is written as “where’s.” A possessive “s” is added to show ownership. For instance “the owner’s vehicle” shows possession while “the owners” does not.

Type	Rule	Example
Use apostrophes	To indicate omitted letters or numbers	Won’t (will not)
		It’s (it is) class of ’08 (2008).
	To form the plural of numbers, letters, signs, and words referred to as words, add an apostrophe and s	Put the g’s and 6’s in the second column.
		Change the &s to and’s.
	To form possessive of singular words not ending in s, add an apostrophe and s	Customer’s
		Woman’s
	To form the possessive of plural words not ending in s, add an apostrophe and s	Women’s
	To form the possessive of plural words ending in s, add only an apostrophe	Customers’
	To show that more than one person possess the same item, make only the last name possessive	Dr. Gifford and Mr. Dunn’s report
	To show separate or individual possession, make each name (or noun) possessive	Dr. Gifford’s and Mr. Dunn’s suggestions
To show the possessive of words indicating time, follow the rules for other nouns	A week’s delay	
	A two days’ visit	
Do not use apostrophes	With possessive pronouns	Its (i.e. “the dog chased its tail”)
		Theirs (i.e. “that box is theirs”)
	With plurals of acronyms	CFRs

Quick Glance

Type	Examples	
Singular	Customer	Woman
Singular Possessive	Customer’s	Woman’s
Plural	Customers	Women
Plural Possessive	Customers’	Women’s

Apostrophes Check-up



Read the questions and then write your answers in the “Answers” column. When you have answered the questions, compare it to the answer key located in Appendix B (p. 70).

Answers:

1. Identify which sentence demonstrates proper use of apostrophes. 1. _____
 - a) Just because we attended the company orientation, doesn't mean we're going to end up on it's A-list.
 - b) Document any noncompliance immediately, and remember it's also a requirement to notify the establishment's management.
 - c) Many establishment's do not have a fully developed SSOP.

2. Identify which sentence demonstrates proper use of apostrophes. 2. _____
 - a) The inspectors response was to notify the establishments management team.
 - b) The inspectors' response was to notify the establishments management team.
 - c) The inspector's response was to notify the establishment's management team.

Master NR Writing



Quotation Marks

Quotation marks are used to set off and represent exact language.

Type	When	Example
Use quotation marks	When directly quoting someone's words	"Ensuring the safety of the nation's food supply makes good public health sense as well as good business sense," said Under Secretary for Food Safety Dr. Richard Raymond.
	For titles of short works (articles, speeches)	The Food Safety Educator published an article entitled "FSIS Puts on a New Face in Cyberspace."
	For words taken from special vocabularies or used in special sense	A full-time "equivalent Inspector" provides about 1,704 working hours per year.
	Quotations short enough to work into your text (three lines or fewer)	In his email, Mike concluded that "what the Inspector accomplished is significant."
How to use quotation marks	When possible, indent quotations of more than three lines	
	Put commas and periods inside closing quotation marks; put semicolons and colons outside	
	Question marks and exclamation points should be put inside closing quotation marks only	
Do not use quotation marks	When only using a person's ideas and not exact words.	



Semicolons

Semicolons, like commas, allow the reader to understand relationships of words in sentences; use them sparingly in writing.

Type	When	Example
Use Semicolons	To join two closely related sentences not joined by a conjunction such as and or but	Be careful to turn off the machine; do not try to change the cartridge while the machine is running.
	To join two independent clauses when the second begins with a conjunctive adverb	Today's inspection lasted for three hours; therefore, allow three hours for the next inspection.
	Before and a comma after i.e. (that is) and e.g. (for example) when what follows - the explanation or example - is a complete sentence	Make sure the pressure is set to at least 102 psi; i.e., it is sufficient to ensure a steady flow.
	Between items in a series when one or more of the items include commas. In a series, using a semicolon to separate items that contain commas prevents misreading	Mr. Sanchez, the President; Mr. Parson, the CEO; and Mrs. Bronson, the CFO, attended the meeting.



Semicolon Check-up



Read the question and then write your answer in the “Answer” space provided. When you have answered the question, compare it to the answer key located in Appendix B (p. 70).

Answer:

1. Identify which sentence is written with the proper use of a semicolon. 1. _____
 - a) A designated FSIS review committee will be reading NRs for the next three months; they will be exploring the documents to determine both strengths and deficiencies.
 - b) A designated FSIS review committee; will be reading NRs for the next three months; they will be exploring the documents to determine; both strengths and deficiencies.
 - c) A designated FSIS review committee will be reading NRs for the next three months they will be exploring the documents to determine both; strengths and deficiencies.

Apostrophe, Quotation Mark, and Semicolon Check-up

The paragraph below contains six different mistakes. Read it carefully and then circle the errors. The six errors consist of:

- ◆ Two examples of incorrect apostrophe use
- ◆ Two examples of incorrect quotation mark use
- ◆ Two examples of incorrect semicolon use

When you have answered the questions, compare it to the answer key located in Appendix B (p. 71).

In the meantime, James Hackett; GPM, was notified promptly of this noncompliance. He then notified maintenance immediately in an attempt to restore sanitary condition’s. The association of “Noncompliance Records has been discussed at some weekly meetings held with the management of this establishment. A similar noncompliance occurred on 11/20/07 and was documented on NR # 13-2007-9709. Plant Managements response to this NR, regarding further planned actions, states in part that “the maintenance superintendent will enforce a preventive maintenance schedule for the noted fans to insure they are well maintained and functional in the future”. This plan was either not implemented; or ineffective in preventing adequate ventilation in the oven room.



Master NR Writing

Word Use

Correct word use can make the difference between a clear piece of writing and one that is confusing.

Type	When	Example
Confusing Pairs	Unclear definitions resulting in words getting interchanged	amount, number
	They sound alike	accept, except (Just remember that the "X" in "except" excludes things—they tend to stand out, be different.)
	Not grammatically correct	can't help but, plan on, fixing to, reckon I'll
Slang	Casual conversation or informal writing	kids (instead of children)
		flunk (instead of fail)
General vs. Specific	General words can be too broad if the specific is known	animal – cocker spaniel
		plant – rose
Clichés	Overused expressions that have lost their ability to communicate effectively	In a nutshell
		Beat around the bush
		Rat race

Word Use Check-up



Read the question and then write your answer in the "Answer" space provided. When you have answered the question, compare it to the answer key located in Appendix B (p. 71).

Answer:

1. Identify which sentence is written with the proper word use. 1. _____
 - a) All beef products in the establishment were contaminated except the shelf-stable products which did not fail the inspection; some of the vacuum packed product was also contaminated.
 - b) A good deal of the beef products in the establishment were contaminated accept the shelf-stable products which made it through the inspection; some of the vacuum packed product was not contaminated.
 - c) All beef products in the establishment were contaminated except the shelf-stable products which passed; some of the vacuum packed product took a dive.



Spelling

Poor spelling distracts your reader and gives the appearance that you don't care. To guard against misspellings, proofread carefully, use the spell checker and find suspect words in the dictionary. Remember, the NR is a legal document. Your writing represents the USDA and your personal credibility.

To check spelling in Microsoft Word:

1. Select the **Review** tab.
2. Click the **Spelling & Grammar** button.
3. Ensure the **Check grammar** box is selected to check both spelling and grammar.
4. When an error is found, select from the following options:
 - ◆ **Ignore Once:** Ignore only this instance of the highlighted word or phrase
 - ◆ **Ignore All:** Ignore all instances of the highlighted word or phrase
 - ◆ **Add to Dictionary:** Adds the word to your personal Word dictionary
 - ◆ **Change:** Changes the current word to the word highlighted under Suggestions
 - ◆ **Change All:** Changes the current word and all identical words in document to the word highlighted under Suggestions
 - ◆ **AutoCorrect:** Creates a rule that changes the current word to the word highlighted under Suggestions in current and all future documents

Spelling: English (U.S.)

Not in Dictionary:

At **approxiamtely** 6:00 A.M. while performing preoperational sanitation inspection in the the Tumbler Room, I observed dust, grease, and small pieces of fat

Suggestions:

approximately



Master NR Writing

Proofread

A spell checker will overlook words that are misused but not misspelled. It is your responsibility to edit your documents to ensure there are no misspellings.

Here are some examples of words that are spelled correctly but may be used incorrectly:

- ◆ Know and no
- ◆ Their and there
- ◆ Form and from
- ◆ Web sight and website
- ◆ Too, to and two
- ◆ Cloths and clothes

Use the spell checker in addition to your own proofreading or you may end up writing a paragraph like this:

Spell checkers kin make miss steaks do too there in ability to fine words that ore spelled rite but miss used. They can't catch punctuation arrows, either. Or sentence fragments. Their fore, dough knot bee leave that ewe can eliminate proofreading the dock you mint yore self.

Proofreading Check-up



Read the question and then write your answer in the "Answer" space provided. When you have answered the question, compare it to the answer key located in Appendix B (p. 71).

Answer:

1. The following sentences will both pass a spell check; however one has words that are misspelled. Please identify the sentence with no spelling errors.
 - a) All personal must except or contest the newly proposed business principals buy close of business or forever hold they're piece; to many people wait until the last minute.
 - b) All personnel must accept or contest the newly proposed business principles by close of business or forever hold their peace; too many people wait until the last minute.

1. _____

Master NR Writing



Wordiness

Writing that contains unnecessary words makes reading a boring task.

William Strunk, Jr., author of *The Elements of Style* (Macmillan Publishing Co., Inc., 1979), said, “A sentence should contain no unnecessary words - a paragraph no unnecessary sentences - for the same reason that a drawing should have no unnecessary lines and a machine no unnecessary parts.”

Strategies to eliminate wordiness include:

Type	When	Example
Delete extra words	Words that don't have added meaning in the sentence	That
		Which was
	Meaningless phrases	I am going to explain
		Each and every one of you
	Compress phrases with unnecessary words	It seems to me that it is getting dark out
		There is the possibility that it may rain.
	Unnecessary repetition	end result
		unexpected surprise

Wordiness Check-up



Read the question and then write your answer in the “Answer” space provided. When you have answered the question, compare it to the answer key located in Appendix B (p. 72).

Answer:

- The following sentences both say the same thing. Select the one that is correctly written. 1. _____
 - When you observe a noncompliance, begin writing the noncompliance record; remember to be descriptive.
 - Anytime you are performing an inspection and observe any type of noncompliance issue, you should immediately begin to write or to prepare the noncompliance record as timeliness is an essential component of the effectiveness of writing that is not ambiguous.



Active and Passive Voice

The active voice makes your writing clear and direct by putting key ideas in power positions within a sentence.

Consider these examples that demonstrate the difference between active and passive voice:

Type	Rule	Example
Active	The subject of the sentence acts	The cat scratched the girl.
		The research department checked the figures.
Passive	The subject is acted upon	The girl was scratched by the cat.
		The figures were checked by the research department.

Exceptions - Use passive voice to emphasize the action rather than the actor or to soften a harsh message. (i.e. “The manager did not complete the task” vs. “The task was not completed by the manager”).

Active and Passive Voice Check-up



Read the question and then write your answer in the “Answer” space provided. When you have answered the question, compare it to the answer key located in Appendix B (p. 72).

Answer:

1. Choose the sentence which uses active voice.

1. _____

- a) Poor documentation can have legal implications and impact public health and safety.
- b) Documentation that is poor can have implications of a legal nature and public health and safety may be impacted as well.



Spelling, Word Use, and Wordiness Check-up

The paragraph below contains six different mistakes. Read it carefully and then circle the errors. The six errors consist of:

- ◆ Two examples of incorrect spelling
- ◆ Two examples of incorrect word use
- ◆ Two examples of extra words that can be eliminated

When you have answered the questions, compare it to the answer key located in Appendix B (p. 72).

At approximately 0620 hr in the morning, while performing procedure 01B02 preoperational sanitation in the cocktail department, I observed noncompliance. After being released by management for preoperational inspection, several peices of equipment were found with meat residue. The residue ranged in size from less than 1/8" to 1/2". Locations of noncompliance were right around the area along a ledge underneath the hopper and near a hydraulic door that drops meat product into another hopper for blending. Other locations of meat residue were on an tower chain that was found in several areas. This chain or conveyer is approximately two feet in width and winds several feet through a tower for cooking. The crimper wheels had meet residue located between many of its parts. This wheel has numerous parts and several areas of concern. The tower that receives cocktails and the tower chain also had meat residue. The approximate size varied from 1/8" to 1".



Module Completed

Congratulations! You have completed the *Writing Skills* Module.





Module

D NR Writing Skills

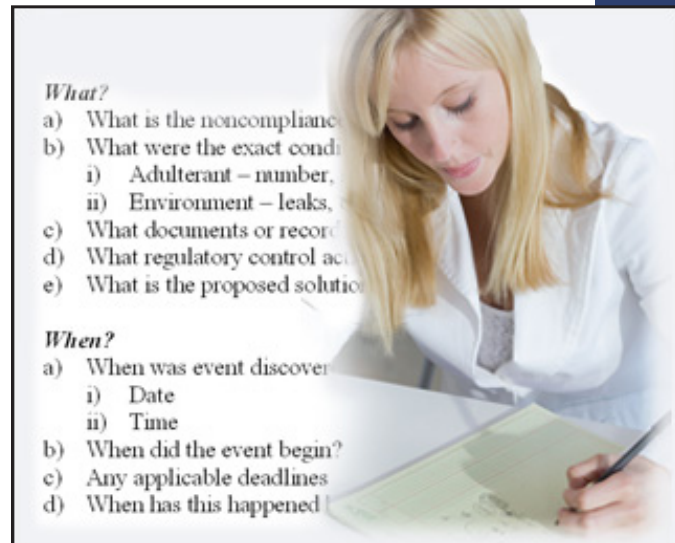
Introduction

The NR Writing Skills module illustrates how to write an effective NR by applying correct writing skills when documenting a noncompliance. By the end of this lesson, you will be able to:

- ◆ Identify the four steps to effective writing
- ◆ Apply the four steps to effective writing by writing a NR

The NR Writing Skills module contains the following topics:

- ◆ NR Writing Skills
- ◆ The Four Steps to Effective Writing
- ◆ Plan
- ◆ The GAD Process
- ◆ Berry Meats Scenario
- ◆ Organize
- ◆ Organize using the 5Ws
- ◆ 5W Sample Outline
- ◆ Berry Meats Scenario Sample Outline
- ◆ Write
- ◆ Berry Meats Rough Description
- ◆ Edit
- ◆ Berry Meats Final Description
- ◆ NR Writing Review
- ◆ Final Exercise
- ◆ Establishment 3000 Scenario
- ◆ Organizing Exercise
- ◆ Establishment 3000 Outline
- ◆ Writing Exercise
- ◆ Establishment 3000 Draft Description
- ◆ Editing Exercise
- ◆ Establishment 3000 Final Description



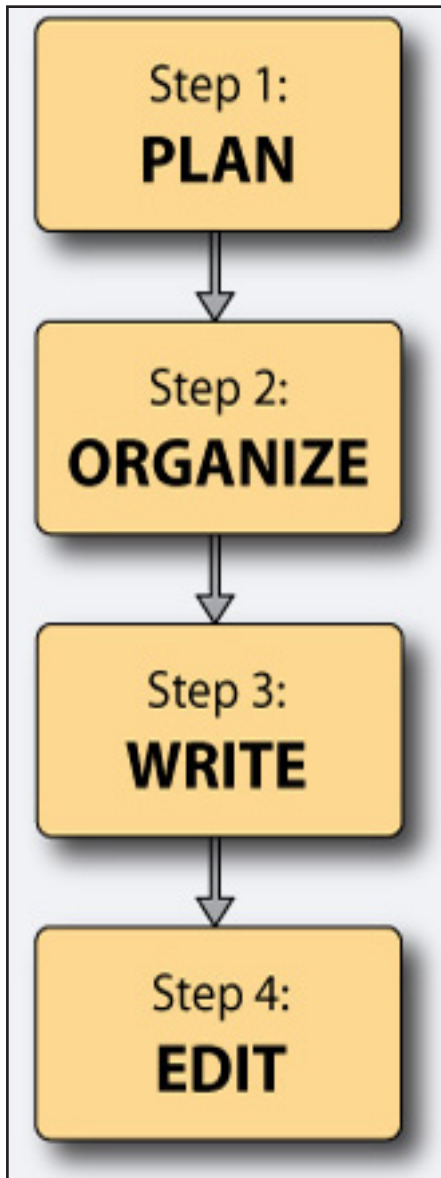


Master NR Writing

NR Writing Skills

There are four steps for effective writing.

1. Plan
2. Organize
3. Write
4. Edit



The Four Steps to Effective Writing

Writing is a process. If you follow the four step process, you will develop an effective NR. Write so that the readers will understand:

- ◆ The circumstances
- ◆ How the noncompliance is associated with regulations
- ◆ Any associations to other NRs
- ◆ What actions have already been taken
- ◆ What actions should be taken next

Below are the four steps to effective writing. For each step, notice the percentage of time you should spend on each to total 100%:

1. Plan	35%
2. Organize	20%
3. Write	30%
4. Edit	15%

At the end of this module, you will get a chance to use these steps to write a NR. Be sure to include everything you have learned from the previous three modules to clearly and succinctly describe the noncompliance.



Plan



Step 1: Plan

A house without a solid foundation may fall down in bad weather. The same can be said for your writing. Before you begin writing a NR, build a foundation by planning your strategy.

Decide whether the facts support your specific reason for documenting the establishment's noncompliance. Examine which regulations were broken and are directly related to the noncompliance. Your strategy is the foundation that will support the NR when it is scrutinized either by appeal or a review committee.

Determine the details of the noncompliance that will communicate your findings clearly to all readers.

The GAD Process

Step 1: Plan

Spend at least 35% of your total time planning the NR. A well thought out strategy will provide the "foundation" for an accurate and reliable report.

During the planning step:

- ◆ Gather the facts and any previous supporting documentation
- ◆ Assess and verify all information
- ◆ Define the associations between the noncompliance and specific relevant regulations and other documentation



Berry Meats Scenario

This scenario contains a noncompliance at the establishment, Berry Meats. Carefully read it over and think about how you would organize the NR. Keep in mind the GAD process and techniques for properly gathering, accessing and defining all the facts to ensure an effective NR.

Berry Meats Scenario

While Inspector Copeland was performing ISP code 01D01, he observed a noncompliance in the oven room, on cook line # 6. Steam had filled the room, and produced a thick opaque vapor which created zero visibility. This circumstance indicated that the ventilation system was not functioning adequately. Ready-to-eat product was being produced on cook lines 5 and 6 at the time. He initiated "Regulatory Control Action" in accordance with Federal Rules of Practice, 9 CFR 500.2. Michael Williams, Plant Owner was notified promptly of this noncompliance and he notified maintenance immediately in an attempt to restore sanitary conditions.

A similar noncompliance occurred on 05/06/2007 and was documented on NR # 20-2007-7097. Plant Management's response to this NR regarding further planned actions states in part "that the maintenance superintendent will enforce a preventive maintenance schedule for the noted fans to ensure they are well maintained and functional in the future."

This plan was either not implemented or was ineffective in preventing adequate ventilation in the oven room.

Keep this Berry Meats Scenario for future reference.



Organize

Step 2: Organize

The key points required in a noncompliance description are:

- ◆ A description of each noncompliance in clear, concise terms, including the exact problem, time of occurrence, location, and effect on the product
- ◆ An explanation of how the establishment was notified of the noncompliance and who was notified of the noncompliance
- ◆ When there is a developing trend of noncompliance, a list of previous NRs and a description of how the NRs derived from the same cause
- ◆ Any unsuccessful further planned actions taken by the establishment regarding the noncompliance
- ◆ Any documented discussions of a developing trend of noncompliance with establishment management
- ◆ Any applicable deadlines
- ◆ Whether a regulatory control action has been taken (reject/retain tag)
- ◆ Product information such as product name, lot # or code date, and amount or weight of affected product, when product is involved

For assistance in identifying key points to include in your NR, view the NR Content Checklist in Appendix A (p. 58). Keep the checklist available for future reference.

Content Checklist

Block 5: Personnel Notified

- Is there a name entered
- Does the name entered in this

Block 6: Relevant Regulation

- Is the regulation cited relevant
- Are all the regulations the plan entered?

Organize using the 5Ws

Step 2: Organize

After planning, the next step is to organize key points before you write to ensure a complete and easy-to-follow document. First, create an initial draft outline of the information using a separate:

- ◆ Word document
- ◆ Scratch paper
- ◆ Notepad

To build your NR outline, note all of the facts, regulations, trends and events to be included, organized according to importance with supporting information under each main point.

Creating an outline will:

- ◆ Organize your observations, references and essential facts
- ◆ Define a structure for your writing (beginning, middle, end)
- ◆ Result in a checklist for ensuring accuracy and completeness

To begin your outline, determine the 5Ws (Who, What, When, Where and Why) and then collect details for each. A simple 5W Sample Outline is provided in Appendix A (p. 57).



5W Sample Outline

This is a sample outline formed using the 5Ws. It is an organized way to gather your facts to help prepare you in writing the NR.

Step 2: Organize

- 1) Who?
 - a) Personnel involved?
 - i) Involved in the event
 - ii) Notified of the event
 - iii) Plant Management
- 2) What?
 - a) What is the noncompliance event
 - b) What were the exact conditions?
 - i) Adulterant – number, size, shape, color, consistency
 - ii) Environment – leaks, condensation, wall or floor quality
 - c) What documents or records reviewed
 - d) What regulatory control actions were taken
 - e) What is the proposed solution
- 3) When?
 - a) When was event discovered?
 - i) Date
 - ii) Time
 - b) When did the event begin?
 - c) When has this happened before
- 4) Where?
 - a) Establishment name
 - b) Specific location within establishment
 - c) Other locations affected by event
- 5) Why?
 - a) Which regulations were involved?
 - i) Regulation A
 - ii) Regulation B
 - b) Other procedures or plans cited?
 - i) HACCP
 - ii) SSOP
 - iii) Others

5W Sample Outline

- 1) Who?
 - a) Personnel involved?
 - i) Involved in the event
 - ii) Notified of the event
 - iii) Plant Management
- 2) What?
 - a) What is the noncompliance event
 - b) What were the exact conditions?



Berry Meats Scenario Sample Outline

Step 2: Organize

Think back to the Berry Meats Scenario. Review the sample outline and consider how the outline has organized the scenario into manageable information.

Berry Meats Scenario Outline

- 1) Who?
 - a) Inspector: Eric Copeland
 - b) Plant Supervisor: Scott Moore
 - c) Plant Owner: Michael Williams
- 2) What?
 - a) Steam had filled the room and produced a thick opaque vapor which created zero visibility
 - b) Ventilation system was not functioning adequately
 - c) Ready-to-eat product was being produced on cook lines 5 and 6 at the time
 - d) Mr. Williams was notified promptly of this noncompliance
 - e) Mr. Williams notified maintenance immediately in an attempt to restore sanitary conditions
- 3) When?
 - a) When performing 06D01
 - i) May 16, 2007
 - ii) 2310 hours
 - a) Similar noncompliance occurred on 05/06/2007 and was documented on NR # 20-2007-7097
 - i) Plant Management's response to this NR states "that the maintenance superintendent will enforce a preventive maintenance schedule for the noted fans to insure they are well maintained and functional in the future."
 - ii) Plan was not implemented or ineffective
- 4) Where?
 - a) Berry Meats
 - b) The oven room, on cook line # 6
- 5) Why?
 - a) 9 CFR Part 416.2 (d)
 - b) 9 CFR Part 416.4 (b) (d)
 - c) Initiated "Regulatory Control Action" in accordance with Federal Rules of Practice, 9 CFR 500.2
 - d) SPS Plan, (B. Establishment, Grounds, and Facilities) page 3, # 5 that states that "ventilation adequate to the extent necessary to prevent adulteration of product and the creation of unsanitary conditions will be provided"

Keep the Berry Meats Scenario Outline for future reference.



Write

Step 3: Write

Now that you have prepared the facts and written a plan or outlined the chain of events, you are ready to start writing your first draft. Note the word first. A common mistake is in thinking once a draft has been written, the report is done.

This is not so; the first draft is only one part of the whole writing process. The idea of the first draft is to get the facts and events down on paper, to flesh out the key points, and to generate content that will shape the finished report. If you have thought the event through and planned well, you may only need to write one draft before editing.

Suggestions for draft writing:

- ◆ Write quickly and deliberately
- ◆ Do not worry about editing
- ◆ Do not interrupt the flow of ideas by stopping to check spelling in a dictionary or by agonizing over a "better" word – this will be completed during the editing step
- ◆ Make a mark in the margin as a reminder to polish your wording later
- ◆ Leave a blank for a word that you can't think of and fill it in later - be sure to go back and fill it in!

Before moving on to editing, take a look at a sample rough draft of the noncompliance event at Berry Meats.



Berry Meats Rough Description

Step 3: Write

Review the sample Berry Meats NR Rough Draft. Notice how the description was written quickly to get thoughts on paper. Time was not spent worrying about editing and grammar as that is done during the editing step.

Rough Draft

Tonight, Sanitation Performance Standards, I observed noncompliance in the oven room. Steam had filled the room, produced a vapor which created. The circumstance indicates the ventilation system wasn't function adequately. Ready-to-eat was being produced on the cook lines, so I initiated "RAC" in accordance with Federal Rules of Practice, 9 CFR 500.2 and discontinue the production of product on cook lines 5 and 6 until such time as compliant was restored and a verbal prevention measure was offered, i.e., In the meantime, he was notified promptly of this noncompliance and he notified maintenance immediately in an attempt to restore sane conditions.

The nr has been discouraged at some weekly meetings held with the management of this establishment. Another one occurred on (look up date) and was documented (document #). Plant Managements response to this NR regarding further planned actoins stated in part "that the maintenance superintendent will enforce a prevention maintenance scheduled for the noted fans to assure they are well maintained and functions in the future."

The requirments 9 CFR Parts 416.2 (d), and 416.4 (b) (d) were not met. Part 416.2 (d) states: Ventilation adequate to control ordors.... Additionally, the plant's SPS Plan, (B. Establishment, Grounds, and Facilities) page 3, # 5 that the creation of unsanitary conditions will be provided," was not met either.



Master NR Writing

Edit

Step 4: Edit

Once you have a solid draft, the editing step is where you proofread and polish your writing. Careful editing ensures that your finished document is accurate, complete and conveys information effectively. Your attention to detail will establish your credibility.

Edit your work to ensure the NR:

- ◆ Is well planned and the purpose is clear
- ◆ Is well organized for accuracy and clarity
- ◆ Uses correct grammar, spelling and punctuation
- ◆ **Does not** use standardized phrases and does use language that accurately describes the noncompliance

Standardized phrases attempt to summarize a problem and often appear as assumptions that do not list facts. Do not allow your writing to include standardized phrases or assumptions such as the following:

- ◆ Continued noncompliance could lead to food borne illness.
- ◆ Continued noncompliance could result in illness or death.

Tips to make the editing process more efficient:

- ◆ Take a short break between writing and editing to get a fresh viewpoint.
- ◆ Reading aloud slows you down, allowing you to catch more errors.
- ◆ Perform a grammar check and content check separately with “different eyes” to keep you focused on the specific type of edits or errors you are looking for.

Look at the NR Editing Checklist in Appendix A (p. 60) and keep it available for future reference.

Editing Checklist

Purpose/Content	
<input checked="" type="checkbox"/>	The purpose of the NR is clear
<input checked="" type="checkbox"/>	Any corrective action is clearly stated
<input checked="" type="checkbox"/>	The information is accurate
<input type="checkbox"/>	The document contains only information relevant to the noncompliance
<input type="checkbox"/>	All questions raised by the noncompliance are addressed

Berry Meats Final Description

Review the Berry Meats Final Description below. Notice the difference between this description and the draft description written during the writing process.

Berry Meats Final Description

Tonight at 2310 hours while performing ISP Code 06D01, Sanitation Performance Standards, (determination of plant compliance with adequate ventilation systems), I observed noncompliance in the oven room, on cook line # 6. Steam had filled the room, and produced a thick opaque vapor which created zero visibility. This circumstance indicated that the ventilation system was not functioning adequately. Ready-to-eat product was being produced on cook lines 5 and 6 at this time, so I initiated “Regulatory Control Action” in accordance with Federal Rules of Practice, 9 CFR 500.2 and discontinued the production of product on cook lines 5 and 6 until such time as compliance was restored and a verbal preventative measure was offered, i.e., management will investigate further into the culprit of this problem in order to resolve it. In the meantime, Michael Williams, GPM was notified promptly of this noncompliance and he notified maintenance immediately in an attempt to restore sanitary conditions.

The association of Noncompliance Records has been discussed at some weekly meetings held with the management of this establishment. A similar noncompliance occurred on 05/06/2007 and was documented on NR # 20-2007-7097. Plant Management’s response to this NR regarding further planned actions states in part “that the maintenance superintendent will enforce a preventive maintenance schedule for the noted fans to insure they are well maintained and functional in



the future.” This plan was either not implemented or ineffective in preventing adequate ventilation in the oven room.

The requirements 9 CFR Parts 416.2 (d), and 416.4 (b) (d) were not met. Part 416.2 (d) states: Ventilation adequate to control odors, vapors, and condensation to the extent necessary to prevent adulteration of product and the creation of unsanitary conditions...must be provided. Additionally, the plant’s SPS Plan, (B. Establishment, Grounds, and Facilities) page 3, # 5 that states that “ventilation adequate to the extent necessary to prevent adulteration of product and the creation of unsanitary conditions will be provided,” was not met.

This document serves as written notification of the repetitive nature of this noncompliance and that continued failure to comply with regulatory requirement(s) could result in additional regulatory or administrative action. Michael Williams was notified verbally and in writing with this official noncompliance record of the failure of this establishment to meet regulatory requirements.

Additional copies of the Berry Meats Rough Draft, Final Draft, and a comparison of the two versions with track changes enabled are available in Appendix A (p. 62-4)

NR Writing Review

Before starting the NR Writing Exercise, here is a quick review of what you have just learned.

Always keep the four-step process in mind when writing NRs.

Plan: Build a solid foundation by gathering, assessing, and defining the noncompliance event.

Organize: Sort out and arrange all of your information to assist in writing the NR.

Write: Take all the facts you have organized and write to paint a picture of the noncompliance.

Edit: Proofread your first draft and edit it for content and grammar.

After you plan and organize a draft outline that includes the facts, key points and other essential information, you are ready to start writing the NR.

After you have finished writing, ensure you edit the content for clarity of purpose. Ask yourself, does it outline the intended information about the noncompliance clearly?

Then check to ensure the information is accurate; you may need to cross-reference your codes, regulations or trends.

Finally, edit the content for appropriate word use, errors in grammar, spelling and punctuation.



Final Exercise

This exercise will give you the opportunity to apply what you have learned so far.

First, read the following scenario while keeping the four steps to effective writing in mind.

Next, follow the four-step process to write a solid NR summary.



Establishment 3000 Scenario

Review the Establishment 3000 scenario, including a summary of the noncompliance, the involved violations, actions taken and additional information.

While you are reading, remember to keep the four step process in mind and how you will refine the facts read in the scenario into a well written and effective NR.

When you have finished reading the scenario, it might be beneficial to keep the Establishment 3000 Scenario available for further reference through this exercise.

Noncompliance

The establishment assumed responsibility to ensure their SSOP's would be implemented and effective. An Inspector performed scheduled task 01B02 after QA performed their monitoring procedures and released the room for start of production. Two deficiencies were found in west processing:

1. The trim table pace belt had 3-4 pieces of fat, approx. ¼ inch in size, on the contact surfaces.
2. The multi-vac head puller had 3 pieces of fat, approx. ¼ inch in size, on the frame.

Violations:

- ◆ SSOP: QA will monitor the implementation of their cleaning program to ensure it is effective.
- ◆ 9 CFR 416.12: requires an effective sanitation program.
- ◆ 9 CFR 416.13(c) and 416.4(b): the establishment did not adequately monitor the effectiveness of their written SSOP
- ◆ 416.13(c): “Each official establishment shall monitor daily the implementation of the procedures in the Sanitation SOP’s.
- ◆ 416.4(b)- “Non-food-contact surfaces

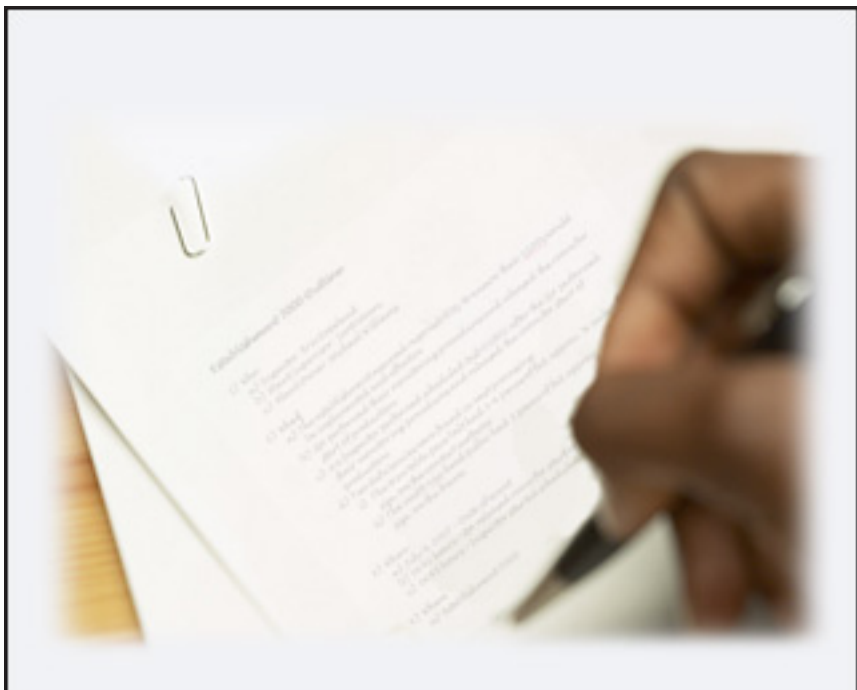
of facilities, equipment, and utensils used in the operation of the establishment must be cleaned and sanitized as frequently as necessary to prevent the creation of in-sanitary conditions and the adulteration of product. The raw meat products designated for production on these in-sanitary contact surfaces may be adulterated by harmful bacteria and cause illness.

Actions Taken:

- ◆ A regulatory control action was taken with US Rejected tags #B38075132 (pace belt), B38075133 (banana blades) and B38075134 (multi-vac head puller) until corrective actions could be taken.
- ◆ I informed Steven Davis, QA Tech, of the noncompliance and he immediately had the equipment re-cleaned and sanitized. I re-inspected and released the equipment for use at approx. 0515 hours.

Additional Information:

NR #25-2006-4809, dated 11-27-2006, on file in the USDA office provides documentation of a previous noncompliance with the same or similar cause. Continued failure to comply with regulatory requirements could lead to enforcement actions described in 9 CFR 500.4.





Organizing Exercise

Construct your own outline for the Establishment 3000 Scenario.

Create an outline in a separate document to organize the facts of the event. Keep this document for reference as it will be used throughout this exercise.

After you have finished writing your own outline, compare the Establishment 3000 outline with your own.

Establishment 3000 Outline

Notice how the key points are organized. How does the example compare with your outline?

Establishment 3000 Outline

- 1) Who
 - a) Inspector: Eric Copeland
 - b) Plant Supervisor: Scott Moore
 - c) Plant Owner: Michael Williams
- 2) What
 - a) The establishment assumed responsibility to ensure their SSOP's would be implemented and effective
 - b) QA performed their monitoring procedures and released the room for start of production
 - c) An Inspector performed scheduled task 01B02 after the QA performed their monitoring procedures and released the room for start of production
 - d) Two deficiencies were found in west processing:
 - i) The trim table pace belt had 3-4 pieces of fat, approx. $\frac{1}{4}$ inch in size, on the contact surfaces.
 - ii) The multi-vac head puller had 3 pieces of fat, approx. $\frac{1}{4}$ inch in size, on the frame.
- 3) When
 - a) July 9, 2007 – Date of event
 - b) 0640 hours – QA released room for start of production
 - c) 0645 hours – Inspector started scheduled task 01B02
- 4) Where
 - a) Establishment 3000
 - b) West processing room
- 5) Why
 - a) SSOP: QA will monitor the implementation of their cleaning program to ensure it is effective.
 - b) 9 CFR 416.12: requires an effective sanitation program
 - c) 9 CFR 416.13(c) and 416.4(b): the establishment did not adequately monitor the effectiveness of their written SSOP
 - i) 416.13(c): “Each official establishment shall monitor daily the implementation of the procedures in the Sanitation SOPs.
 - ii) 416.4(b)- “Non-food-contact surfaces of facilities, equipment, and utensils used in the operation of the establishment must be cleaned and sanitized as frequently as necessary to prevent the creation of in-sanitary conditions and the adulteration of product. The raw meat products designated for production on these in-sanitary contact surfaces may be adulterated by harmful bacteria and cause illness.

Keep a copy of the Establishment 3000 Outline for future reference.



Master NR Writing

Writing Exercise

Now, it is time to write your draft. Be sure to refer to your outline and use it as a guide. Notice how much easier it is to complete the NR with all the hard work out of the way! Remember, as you write your draft, do not worry about editing. That comes next.



Write your draft and then review the Establishment 3000 Draft Description.

Establishment 3000 Draft Description

Review the Establishment 3000 Draft Description below. Compare it to your draft. Notice the differences. No two draft versions will ever be the same.

Rough Draft

This estab has a reg on page 8, “cite reg.” This SSOP (Look up). Regulations 9CFR416.12 require an effective sanitation program. The significance of having clean and sanitized contact surfaces is to insure that residues of meat and poultry processes from the previous days of production is removed since the presence of such residues can be a growth medium for the bacteria that are known in the days production. I performed a scheduled task, after the QA performed their monitoring procedures and released the room for start of production, and I found the following in west processin’s trim table pace, and the multi-vac head puller had 3 pieces of fat, approx. ¼ inch in size on the frame. This is a non-complianct with 9CFR416.13(c) and 416.4(b). Because the establishment did not adequately monitor the effectivity of their written SSOP.

The regulations states: 416.13(c)- “Look up reg” and 416.4(b)- “Look up reg” A regulatory control action was taken with US Rejected tags #B38075132 (pace belt), #? (banana blades) and B38075134 (multi-vac head puller) until correct actions could be taken. I informed Scott Moore, and he immediately reinspected and released the equipment for use. NR #25-2006-

4809, dated 11-27-2006, on file in the USDA office provides documentation of a previous non-compliant with the same or similar cause. Continued failure to comply with a regulatory requirements could lead to enforcement actions described in 9CFR500.4.

Editing Exercise

Now it is time to edit.

- ◆ First, review the draft content for clarity of purpose. Is the essential information about the noncompliance clearly presented?
- ◆ Check to ensure the information is accurate. Did you cross-reference your codes, regulations and trends?
- ◆ Finally, edit the content for appropriate word use, errors in grammar, spelling and punctuation.

Remember, the Editing and Content Checklist are available in the appendix.



Establishment 3000 Final Description

Read through the Establishment 3000 Final Description. Compare it with your description. Consider the differences between them and what that means to you.

When you are comparing your final version with this example Establishment 3000 Final Description and ask yourself the following questions:

- ◆ How does it compare with your composition?
- ◆ Was all of the required documentation included?
- ◆ Did the description paint a clear picture of the noncompliance?
- ◆ Were any items missing in your written description that were included in the one provided?
- ◆ Did you include any details that were not in the one provided? Were they essential?
- ◆ After review, would you change your summary? Why?

Establishment 3000 Final Description

Establishment 3000 has a written Sanitation Standard Operating Procedure (SSOP) that says on page 8, “All food contact equipment will be cleaned and sanitized prior to use.” The SSOP states that a QA will monitor the implementation of their cleaning program that assures that the program is effective. Regulations 9 CFR 416.12 require an effective sanitation program. The significance of having clean and sanitized contact surfaces is to assure that residues of meat and poultry processes from the previous days of production are removed since the presence of such residues can be a growth medium for the bacteria that are known to be harmful to health to directly contaminate meat and poultry products used in the days production. The company agreed to assume the responsibility to ensure their SSOP’s, as written, would be effective in preventing these residues from remaining after a thorough clean up and sanitation process.

However, at 0440 hours, I performed a scheduled verification task, 01B02, after the QA performed their monitoring procedures and released the room for start of production, and I found the following deficiency: In west processing the trim table pace belt had 3-4 pieces of fat, approx. ¼ inch in size, on the contact surfaces, and the multi-vac head puller had 3 pieces of fat, approx. ¼ inch in size, on the frame. This is a noncompliance with 9 CFR 416.13(c) and 416.4(b) because the establishment did not adequately monitor the effectiveness of their written SSOP.

The regulations state: 416.13(c)- “Each official establishment shall monitor daily the implementation of the procedures in the Sanitation SOP’s.” and 416.4(b)- “Non-food-contact surfaces of facilities, equipment, and utensils used in the operation of the establishment must be cleaned and sanitized as frequently as necessary to prevent the creation of in-sanitary conditions and the adulteration of product.” A regulatory control action was taken with US Rejected tags #B38075132 (pace belt), B38075133 (banana blades) and B38075134 (multi-vac head puller) until corrective actions could be taken.

I informed Scott Moore, Supervisor, of the noncompliance and he immediately had the equipment re-cleaned and sanitized. I re-inspected and released the equipment for use at approx. 0515 hours. NR #25-2006-4809, dated 11-27-2006, on file in the USDA office provides documentation of a previous noncompliance with the same or similar cause. Continued failure to comply with regulatory requirements could lead to enforcement actions described in 9 CFR 500.4.



Master NR Writing

Module Completion

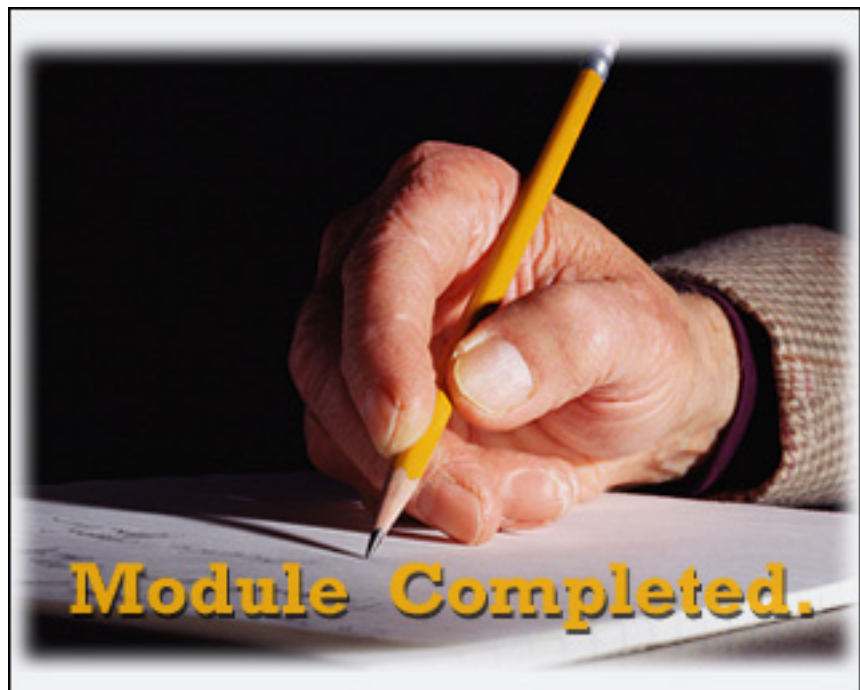
Congratulations! You have completed the NR Writing Skills Module and are almost done. You have completed the lessons portion of the Master FSIS NR Writing training.

Before completing the training you will need to take the 20 question assessment (Appendix C, p. 73).

1. Print out the assessment.
2. Answer the questions in the spaces provided.
3. Mail or fax the completed assessment to the following address:

Food Safety and Inspection Service
Continuing Education and Distance Learning Office
5601 Sunnyside Ave.
Maildrop 5270
Beltsville, MD 20705

Fax: (301) 504-3372





Appendix

A

NR Writing Aids



NR Associations

Example 1:

You issued a NR on April 5 for the establishment not performing the direct observation verification procedures as specified in the HACCP plan. Two weeks later you observe, at a different critical control point (CCP) in the same HACCP plan, that the establishment does not perform the direct observation verification procedures as specified in the HACCP plan. You decide that these two noncompliances have the same cause (not performing verification), and that you should associate them in your documentation. You realize you could associate these noncompliances even if it was across two different HACCP plans.

Example 2:

You issued a NR on April 12 when you took a measurement at CCP 3 and found that the critical limit was not met. On May 10, you observe that the establishment is not conducting the monitoring procedures as specified in the HACCP plan: they missed a monitoring check at CCP 2. Although these are both monitoring noncompliances and are both documented under the same procedure code, you determine that they are not from the same cause. You do not associate them in your documentation.

Example 3:

You issued a NR on January 14 when you observed that the establishment did not perform one of the verification procedures. On November 23, you again observe that the establishment did not perform one of the verification procedures. Although these two noncompliances both have the same cause, you determine that the establishment has shown a substantial period of compliance, and you decide not to associate this NR to the previous one.

Example 4:

You issued a NR on September 2, when the establishment had a deviation, and the corrective actions taken did not meet 417.3. They did not implement measures to prevent the recurrence of the deviation, and they did not take appropriate measures to ensure that the CCP was under control after the actions were taken. On November 4, the establishment has another deviation at the same CCP, and as you verify the corrective actions, you observe that the establishment did not implement measures to identify and eliminate the cause of the deviation, and they did not implement measures to prevent the recurrence of the deviation. You determine that although some time has lapsed, the establishment has not shown a substantial period of compliance. You determine that both of these noncompliances are due to the same cause, which is, not completing all parts of the requirements for corrective action, and you decide to associate them in your documentation.



5W Sample Outline

- 1) **Who?**
 - a) Personnel involved?
 - i) Involved in the event
 - ii) Notified of the event
 - iii) Plant Management

- 2) **What?**
 - a) What is the noncompliance event
 - b) What were the exact conditions?
 - i) Adulterant – number, size, shape, color, consistency
 - ii) Environment – leaks, condensation, wall or floor quality
 - c) What documents or records reviewed
 - d) What regulatory control actions were taken
 - e) What is the proposed solution

- 3) **When?**
 - a) When was event discovered?
 - i) Date
 - ii) Time
 - b) When did the event begin?
 - c) Any applicable deadlines
 - d) When has this happened before

- 4) **Where?**
 - a) Establishment name
 - b) Specific location within establishment
 - c) Other locations affected by event

- 5) **Why?**
 - a) Which regulations were involved?
 - i) Regulation A
 - ii) Regulation B
 - b) Other procedures or plans cited?
 - i) HACCP
 - ii) SSOP
 - iii) Others



NR Content Checklist

Block 5: Personnel Notified

- Is there a name entered
- Does the name entered in this block match the name entered in the text in Block 10?

Block 6: Relevant Regulation(s)

- Is the regulation cited relevant to the described noncompliance?
- Are all the regulations the plant fails to meet while performing this inspection procedure entered?

Block 6a: Associated NR(s)

- Was the NR associated to a previous NR by listing the previous NR with a similar noncompliance with the same root cause?

Block 8: Inspection Type

- Does the inspection type of the procedure match the noncompliance?

Block 9: Verification Activity

- Was the correct activity type checkbox selected (Review & Observation, Record Keeping, or Both) to describe the method used to discover the noncompliance?
- If affected product was discovered, is information included in section 9a?
- If a Retain/Reject tag was used, is the information included in section 9b?

Block 10: Description of the Noncompliance

- Are the exact conditions described so the noncompliance can be understood?
- Is the time the noncompliance occurred included either as a descriptive event (Ex: at preop) or as the exact time (Ex: 0600)?
- Is the exact location described adequately so the place could be located again?
- Is the effect on product described? (Note: when product is adulterated/contaminated the amount, time frame of the production, lot, code date, or similar identification should be included.)
- Were establishment personnel notified?
- Is any regulatory control actions taken documented or if a RCA was not required is that reflected in a supportable manner in the description?
- If a record review was pertinent to the noncompliance, were documents reviewed and the findings from this review included in the description with procedures, plans, and/or records clearly identified?



Associations If the NR is not associated to any other NRs, boxes 10-9 through 10-12 should be marked NA.

- Is the association written to include the last NR only and include the date the most recent NR was issued?
- Is the description and documentation included to show that these previous actions were ineffective or not implemented?
- Is there information documenting that this developing trend has been discussed with establishment management, stating when it was discussed and with whom?

Block 12: Signature of Inspection Program Employee

- Is the NR signed by the CSI/IIC?

Block 13: Appeal Status

- If the NR is currently under appeal, has the status of the appeal been listed?

Block 14: Plant Management Response (Immediate Action(s))

- Have the corrective actions (and if required further planned actions/preventive measures) proffered and/or taken by the establishment been documented? (Note: If plant management elects not to respond in writing, the CSI/IIC should document the oral response given and actions taken by the plant.)
- Do the corrective actions provided satisfy all regulatory requirements?

Block 15: Plant Management Response (Further planned action(s))

- Do the corrective actions and if there is a regulatory requirement for an action to prevent the recurrence meet regulatory requirements? (Note: If plant management elects not to respond in writing, the CSI/IIC should document the oral response given and actions taken by the plant.)

Block 18 & 19: Verification Signature of Inspection Program Employee and Date

- Does the information from all other sections support the fact that the establishment has brought itself in to compliance with the regulatory requirements and having been verified is signed by the CSI/IIC?
- Is the verification date provided?



NR Edit Checklist

Purpose/Content

- The purpose of the NR is clearly indicated.
- Any corrective action is clearly indicated.
- The information is accurate and up to date.
- The document contains only essential facts and no unnecessary details.
- All questions raised by the document are answered.

Organization

- The document begins with a purpose statement and ends with a call to action.
- Content organization is logical and appropriate.
- Items are given in correct order.
- Ideas are clearly and simply stated.

Wording

- Wording is specific.
- Jargon is avoided and abbreviations are defined as necessary for primary and secondary audiences.
- Words necessary for meaning have not been omitted.
- All unnecessary words have been deleted; wordy phrases have been tightened.
- The tone is appropriate for the audience and the subject matter.
- Terminology is correct.

Mechanics

- Punctuation is correct and consistent.
- Homonyms (there, their) and commonly confused words (affect, effect) have been double checked.
- Capitalization is correct and consistent.
- Plural verb forms are used with plural subjects: singular verb forms with singular subjects.
- Singular pronouns replace singular nouns; plural pronouns replace plural nouns.
- When “this” and “it” are used they refer to a specific word.
- Verb tense is correct.



Mechanics *(Continued)*

- “I-me” and “who-whom” are used correctly.
- There are no run-on sentences or sentences joined by commas (comma splices).
- Modifiers are placed as close as possible to the words they explain.
- No typos (typographical errors).
- No repetition of standardized language - if the circumstances are described appropriately, any public health concerns will be apparent.
- Descriptions are in clear, concise terms, including the exact problem, time of occurrence, location, and effect on the product, if any
- An explanation of how management was notified of the noncompliance
- When there is a developing trend of noncompliance, a list of previous NRs and a description of how the NRs derived from the same cause.
- Records of any discussions with establishment management regarding developing trends.
- Any unsuccessful further planned actions taken by the establishment to the noncompliances.
- Any applicable deadlines.
- Whether a regulatory control action (tag) was taken.
- Any discussions of a developing trend of noncompliance with establishment management.



Comparison Demonstration: Rough Draft

Watch for examples that are too vague. For example, in the first sentence, "Tonight," is too vague and the exact date and time should be used.

Remember to use a conjunction when you are combining two sentences together.

Rough Draft

Tonight1, Sanitation Performance Standards, I observed noncompliance in the oven room. Steam had filled the room, produced a vapor which created. The circumstance indicates the ventilation system wasn't function adequately. Ready-to-eat was being produced on the cook lines, so I initiated "RAC" as mandated by the Federal Rules of Practice, 9 CFR 500.2 and discontinue the production of product on cook lines 5 and 6 until such time as compliant was restored and a verbal prevention measure was offered. i.e., In the meantime, he was notified promptly of this noncompliance and he notified maintenance immediately in an attempt to restore sane conditions.

The nr has been discouraged at some weekly meetings held with the management of this establishment. Another one occurred on (look up date) and was documented (document #). Plant Managements responce to this NR regarding further planned actoins stated in part "that the maintenence superintendent will enforce a prevention maintenance scheduled for the noted fans to assure they are well maintained and functions in the future."

The requirments 9 CFR Parts 416.2 (d), and 416.4 (b) (d) were not met. Part 416.2 (d) states: Ventilation adequate to control ordors.... Additionally, the plant's SPS Plan, (B. Establishment, Grounds, and Facilities) page 3, # 5 that the creation of unsanitary conditions will be provided," was not met either.

Make sure the verb tense is used correctly and consistently. For example, the word "indicates" should be "indicated" since this event happened in the past, all associated verbs should be in past tense.

When finished writing you draft, proofread carefully to make sure you correct any instances of incorrect word use such as in the final sentence of the first paragraph, "...in an attempt to restore sane conditions." In this instance, the word "sanitary" should be used.

View the *Track Changes* and *Final Draft* documents to see all the changes that were made to the rough draft.



Comparison Demonstration: Track Changes

The document below illustrates each insertion, deletion or formatting change made during the editing process. Any content added to the document is underlined and colored, while deletions are shown in balloons on the right.

Berry Meats Final Description

Tonight at 2310 hours while performing ISP Code 01D01, Sanitation Performance Standards, (determination of plant compliance with adequate ventilation systems), I observed noncompliance in the oven room on cook line # 6. Steam had filled the room, and produced a thick opaque vapor which created zero visibility. This circumstance indicated that the ventilation system was not functioning adequately. Ready-to-eat product was being produced on cook lines 5 and 6 at this time, so I initiated "Regulatory Control Action" as mandated by the Federal Rules of Practice, 9 CFR 500.2 and discontinued the production of product on cook lines 5 and 6 until such time as compliance was restored and a verbal preventative measure was offered, i.e., management will investigate further into the culprit of this problem in order to resolve it. In the meantime, Michael Williams, GPM was notified promptly of this noncompliance and he notified maintenance immediately in an attempt to restore sanitary conditions.

The Jinking of Noncompliance Records has been discussed at some weekly meetings held with the management of this establishment. A similar noncompliance occurred on 05/06/2007 and was documented on NR # 20-2007-7097. Plant Management's response to this NR regarding further planned actions states in part "that the maintenance superintendent will enforce a preventive maintenance schedule for the noted fans to insure they are well maintained and functional in the future." This plan was either not implemented or ineffective in preventing adequate ventilation in the oven room.

The requirements 9 CFR Parts 416.2 (d), and 416.4 (b) (d) were not met. Part 416.2 (d) states: Ventilation adequate to control odors, vapors, and condensation to the extent necessary to prevent adulteration of product and the creation of unsanitary conditions...must be provided. Additionally, the plant's SPS Plan, (B. Establishment, Grounds, and Facilities) page 3, # 5 that states that "ventilation adequate to the extent necessary to prevent adulteration of product and the creation of unsanitary conditions will be provided," was not met.

This document serves as written notification of the repetitive nature of this noncompliance and that continued failure to comply with regulatory requirement(s) could result in additional regulatory or administrative action. Michael Williams was notified verbally and in writing with this official noncompliance record of the failure of this establishment to meet regulatory requirements.

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Comparison Demonstration: Final Draft

Berry Meats Final Description

Tonight at 2310 hours while performing ISP Code 01D01, Sanitation Performance Standards, (determination of plant compliance with adequate ventilation systems), I observed noncompliance in the oven room, on cook line # 6. Steam had filled the room, and produced a thick opaque vapor which created zero visibility. This circumstance indicated that the ventilation system was not functioning adequately. Ready-to-eat product was being produced on cook lines 5 and 6 at this time, so I initiated "Regulatory Control Action" as mandated by the Federal Rules of Practice, 9 CFR 500.2 and discontinued the production of product on cook lines 5 and 6 until such time as compliance was restored and a verbal preventative measure was offered, i.e., management will investigate further into the culprit of this problem in order to resolve it. In the meantime, Michael Williams, GPM was notified promptly of this noncompliance and he notified maintenance immediately in an attempt to restore sanitary conditions.

The linking of Noncompliance Records has been discussed at some weekly meetings held with the management of this establishment. A similar noncompliance occurred on 05/06/2007 and was documented on NR # 20-2007-7097. Plant Management's response to this NR regarding further planned actions states in part "that the maintenance superintendent will enforce a preventive maintenance schedule for the noted fans to insure they are well maintained and functional in the future." This plan was either not implemented or ineffective in preventing adequate ventilation in the oven room.

The requirements 9 CFR Parts 416.2 (d), and 416.4 (b) (d) were not met. Part 416.2 (d) states: Ventilation adequate to control odors, vapors, and condensation to the extent necessary to prevent adulteration of product and the creation of unsanitary conditions...must be provided. Additionally, the plant's SPS Plan, (B. Establishment, Grounds, and Facilities) page 3, # 5 that states that "ventilation adequate to the extent necessary to prevent adulteration of product and the creation of unsanitary conditions will be provided," was not met.

This document serves as written notification of the repetitive nature of this noncompliance and that continued failure to comply with regulatory requirement(s) could result in additional regulatory or administrative action. Michael Williams was notified verbally and in writing with this official noncompliance record of the failure of this establishment to meet regulatory requirements.



Appendix

B

Module Check-up Answer Key



Module A

Noncompliance Record Writing Process Overview Check-Up Answers

1. What is the FSIS primary tool for documenting noncompliance in establishments?
 - a) Documentation of the relationship between the noncompliance and specific regulations
 - b) Planned actions outlined in the establishment's SSOP
 - c) The ability to observe a situation objectively
 - d) The noncompliance record (NR)

2. "Time and location, inspection findings, previous unsuccessful corrective actions, applicable deadlines, establishment response to a previous notification and any applicable regulatory control actions taken," represents all of the information you must:
 - a) Keep written down in case you have to appear before a review board
 - b) Keep in your records should the NR come up for appeal in the future
 - c) Be sure to include when documenting the facts for any NR
 - d) None of the above

3. When writing a NR for more than one noncompliance, you must _____.
 - a) Identify at least one noncompliance using clear and concise language
 - b) Identify each noncompliance using clear and concise language
 - c) At least make sure you refer to the noncompliance somewhere in the NR
 - d) Determine if the noncompliance was intentional or accidental

Responsibility Matching Answers

1. Will support the FLS, the CSI or the in-plant supervisor if additional help is needed with the NR or other regulatory control action.	1. <u>EIAO</u>
2. Will work with the CSI to ensure documentation is accurate and supports any future enforcement action.	2. <u>FLS</u>
3. According to the Rules of Practice (ROP) and FSIS regulations, inspection personnel who observe a noncompliance must ensure the violation is isolated and/or controlled and any appropriate control actions are taken and then to write the NR.	3. <u>CSI</u>
4. Maintains regulatory compliance with its written, signed and dated HACCP and SSOP plan and SPS regulations.	4. <u>Establishment</u>



Module B

NR Writing Lifecycle Flowchart Check-Up Answers

Corrective action is taken to control the noncompliance and then the NR is composed in PHIS	1. <u>3</u>
The NR is supported and reviewed by the FLS or if needed, other authorized personnel such as the EIAO	2. <u>5</u>
CSI Performs Inspection	3. <u>1</u>
A noncompliance is observed	4. <u>2</u>
CSI or PHV gives copy of NR to Plant Management	5. <u>4</u>

Impact of Noncompliance Record Writing Answers

1. Read the following Block 10 paragraph describing a noncompliance and select the most likely outcome from the choices provided.

At approximately 15:30 PM, while performing operational inspection, in the Fabrication Department, Zone #2, Unit 1, Beef Holding Room, the following non-compliance was observed: A small bird was flying around the ceiling area of the Beef Holding Room. The room was rejected with US Reject tag #B4354005. A check of the QA Pest Control Audit showed that no deviations were recorded. There was no product in the room at the time, but the potential for a food safety hazard existed as product normally is stored in this area. Mr. Benjamin, the QA Supervisor was notified of this non-compliance. After the bird was removed, and the Beef Holding Room was cleaned, sanitized and re-inspected, the room was released for production. The establishment failed to meet the requirements of 9-CFR 416.2(b)(3) of the Federal Meat and Poultry Regulations, which states: “Walls, floors, ceilings, doors, windows and other outside openings must be constructed and maintained to prevent the entrance of vermin, such as flies, rats, and mice.” and their own record for operational inspection (dated 5/10/2005) under Beef Holding Room which states:” This area received visual/organoleptic inspection of the floors, walls, and ceiling, and associated Acme Meats equipment by QA personnel and was found acceptable.” Mr. G. Manager was notified both verbally and in writing of the plant’s failure to meet regulatory requirements and the requirements of their own SOP.

- a) The NR is well written and the noncompliance is described so the next required actions are clear.
- b) The NR is well written, includes a clear description and cites appropriate regulations for the noncompliance.
- c) The NR is appealed and the appeal is granted due to the absence of cited regulations and a detailed description of the noncompliance.
- d) The writer’s ability to write an effective NR is so outstanding that his/her FLS asks them to participate in a NR writing training to teach other inspectors how to write effective NRs.

e) A, B, and D



Master NR Writing

2. Which step in the NR writing lifecycle is not correct?
 - a) Inspector Performs Inspection
 - b) Plant is found out of compliance
 - c) EIAO is notified of the noncompliance
 - d) Inspector gives copy of NR to Plant Management
 - e) NR is reviewed by authorized personnel
3. Which statement best describes the positive impact of a well-written NR?
 - a) A well-written NR will protect the credibility of you and FSIS and can help protect public health and safety.
 - b) A well-written NR will ensure an establishment will be shut down without dangerous delays.
 - c) A well-written NR keeps the EIAO happy and increases your chances for a raise or promotion
 - d) A well-written NR may be used as a standard by which all other NRs are held during committee reviews.
4. Writing an incomplete NR can _____.
 - a) Prevent dangerous conditions from persisting at an establishment
 - b) Ensure the public health and safety is protected
 - c) Prevent retaliation by the establishment in question
 - d) Cause dangerous conditions to persist at an establish and jeopardize public health and safety
5. Which block of information in the NR is most important to ensure dangerous conditions do not persist at an establishment?
 - a) Blocks 1 – 5
 - b) Blocks 6 – 9
 - c) Block 10
 - d) The entire NR must be completely and accurately filled out using good practical writing skills along with concise, descriptive language.



Module C

Verb Check-Up Answer

1. Identify which sentence is written with the proper verb agreement.
 - a) The Directive 5000.1, the SSOP and the SPS is the foundation for managing and regulating establishment compliance issues.
 - b) Regulation of establishment compliance issues by FSIS is managed using the Directive 5000.1, the SSOP and the SPS.

Capitalization Check-Up Answers

1. Identify which sentence is written with proper use of capitalization.
 - a) John Baxter heads up our Northern Regional Division.
 - b) Our northern regional division offices are managed out of Cleveland by John Baxter.
2. Identify which sentence is written with the proper use of capitalization.
 - a) The Centipede in Fig. 2 is approximately 4-Inches long.
 - b) The spore cluster in fig. 3 is exactly 1 in. in diameter.

Comma Check-Up Answers

1. Identify which sentence demonstrates proper use of commas.
 - a) The Food Safety and Inspection Service is developing a new NR writing course to ensure inspection personnel know how to write an effective noncompliance report.
 - b) When a FSIS inspector observes a noncompliance at an establishment, the first course of action is to notify the establishment's management of the noncompliance and then to write the NR.
2. Always use a comma to break up a long sentence.
 - a) True
 - b) False



Master NR Writing

Capitalization, Punctuation, and Subject and Verb Agreement Check-up Answers

Tonight at 2310 hours I performed ISP Code 06D01, Sanitation Performance Standards (determination of plant compliance with adequate ventilation systems). **d**uring this task, I observed noncompliance, **i**n the oven room on cook line # 6. Steam **f**ills the room and produced a thick, opaque vapor which resulted in zero visibility. This circumstance indicated that the ventilation system was not functioning adequately. Ready-to-eat product was being **p**roduce on cook lines 5 and 6 at this time **s**o I initiated “Regulatory Control Action” in accordance with Federal Rules of Practice, 9 **c**fr 500.2. I discontinued the production of product on cook lines 5 and 6 until such time as compliance was restored and a verbal preventative measure was offered. **i**e, management will investigate further into the culprit of this problem in order to resolve **i**t.

Apstrophe Check-up Answers

1. Identify which sentence demonstrates proper use of apostrophes.
 - a) Just because we attended the company orientation, doesn't mean we're going to end up on it's A-list.
 - b)** Document any noncompliance immediately, and remember it's also a requirement to notify the establishment's management.
 - c) Many establishment's do not have a fully developed SSOP.
2. Identify which sentence demonstrates proper use of apostrophes.
 - a) The inspectors response was to notify the establishments management team.
 - b) The inspectors' response was to notify the establishments management team.
 - c)** The inspector's response was to notify the establishment's management team.

Semicolon Check-up Answer

1. Identify which sentence is written with the proper use of a semicolon.
 - a)** A designated FSIS review committee will be reading NRs for the next three months; they will be exploring the documents to determine both strengths and deficiencies.
 - b) A designated FSIS review committee; will be reading NRs for the next three months; they will be exploring the documents to determine; both strengths and deficiencies.
 - c) A designated FSIS review committee will be reading NRs for the next three months they will be exploring the documents to determine both; strengths and deficiencies.



Apostrophe, Quotation Mark, and Semicolon Check-Up Answers

In the meantime, James Hackett; GPM, was notified promptly of this noncompliance. He then notified maintenance immediately in an attempt to restore sanitary condition's. The association of "Noncompliance Records has been discussed at some weekly meetings held with the management of this establishment. A similar noncompliance occurred on 11/20/07 and was documented on NR # 13-2007-9709. Plant Management's response to this NR, regarding further planned actions, states in part that "the maintenance superintendent will enforce a preventive maintenance schedule for the noted fans to insure they are well maintained and functional in the future". This plan was either not implemented; or ineffective in preventing adequate ventilation in the oven room.

Word Use Check-Up Answer

1. Identify which sentence is written with the proper word use.
 - a) All beef products in the establishment were contaminated except the shelf-stable products which did not fail the inspection; some of the vacuum packed product was also contaminated.
 - b) A good deal of the beef products in the establishment were contaminated accept the shelf-stable products which made it through the inspection; some of the vacuum packed product was not contaminated.
 - c) All beef products in the establishment were contaminated except the shelf-stable products which passed; some of the vacuum packed product took a dive.

Proofreading Check-Up Answer

1. The following sentences will both pass a spell check; however one has words that are misspelled. Please identify the sentence with no spelling errors.
 - a) All personal must except or contest the newly proposed business principals buy close of business or forever hold they're piece; to many people wait until the last minute.
 - b) All personnel must accept or contest the newly proposed business principles by close of business or forever hold their peace; too many people wait until the last minute.



Wordiness Check-Up Answer

1. The following sentences both say the same thing. Select the one that is correctly written.

- a) When you observe a noncompliance, begin writing the noncompliance record; remember to be descriptive.
- b) Anytime you are performing an inspection and observe any type of noncompliance issue, you should immediately begin to write or to prepare the noncompliance record as timeliness is an essential component of the effectiveness of writing that is not ambiguous.

Active and Passive Voice Check-Up Answer

1. Choose the sentence which uses active voice.

- a) Poor documentation can have legal implications and impact public health and safety.
- b) Documentation that is poor can have implications of a legal nature and public health and safety may be impacted as well.

Spelling, Word Use, and Wordiness Check-Up Answers

At approximately 0620 hr **in the morning**, while performing procedure 01B02 preoperational sanitation in the cocktail department, I observed noncompliance. After being released by management for preoperational inspection, several **peices** of equipment were found with meat residue. The residue ranged in size from less than 1/8" to 1/2". Locations of noncompliance were **right around the area** along a ledge underneath the hopper and near a hydraulic door that drops meat product into another hopper for blending. Other locations of meat residue were on **an** tower chain that was found in several areas. This chain or conveyor is approximately two feet in width and winds several feet through a tower for cooking. The crimper wheels had **meet** residue located between many of its parts. This wheel has numerous parts and several areas of concern. The tower that receives cocktails and the tower chain also had meat residue. The **approximate** size varied from 1/8" to 1".



Appendix

C

NR Writing Assessment

Name:
(Last.) (First) (M.)

District Office:
Job Title:

Read each question then write your response in the space provided.

- 1. Which of the choices represents the potential impact of a poorly written NR? 1. _____
 - a. Can impair the Inspector’s personal credibility
 - b. Jeopardizes overall FSIS credibility
 - c. Can put the public health and safety at risk
 - d. All of the above

- 2. Writing is a process that involves four steps. In general, which step should involve the biggest percentage of time? 2. _____
 - a. Planning
 - b. Organizing
 - c. Writing
 - d. Editing

- 3. Creating an initial draft outline before writing the NR represents which step in the writing process? 3. _____
 - a. Planning
 - b. Organizing
 - c. Writing
 - d. Editing

- 4. Identify which sentence is written with proper verb agreement. 4. _____
 - a. This set of inspections are complete.
 - b. These inspections are complete.

- 5. Identify which sentence is written with the proper use of capitalization. 5. _____
 - a. The inspection of Berry Farms was conducted on November 12.
 - b. The inspection started at 11:30 am and ended at 1:00 PM.

- 6. Identify which sentence is written with the proper use of periods. 6. _____
 - a. In the password field, type “password1.”
 - b. In the password field, type the password (password1).

- 7. Identify which sentence demonstrates proper use of commas. 7. _____
 - a. The establishment employs 4300 individuals.
 - b. The inspection occurred Tuesday, November 2, 2008.

- 8. Identify which sentence demonstrates proper use of apostrophes. 8. _____
 - a. The inspector’s report demonstrated his excellent grammar.
 - b. The inspectors’s reports demonstrated their excellent grammar.

- 9. Identify which sentence demonstrates proper use of quotation marks. 9. _____
 - a. The article in the newspaper was entitled “Inspectors Find Unsafe Conditions.”
 - b. The article summarized what the inspectors described as gross negligence.

- 10. Identify which sentence demonstrates proper use of semicolons. 10. _____
 - a. The affected product has been found in Milwaukee, WI; Minneapolis, MN; and Cleveland, OH.
 - b. The affected product is harmful to small children; the elderly; and those with weakened immune systems.

Name:
(Last) (First) (M.)

District Office:
Job Title:

11. Identify which sentence is written with proper word use. 11. _____
- a. Plant management would not except that the establishment flunked the inspection.
 - b. Plant management would not accept that the establishment failed the inspection.
12. True or false. Spell check is a reliable way to catch all of the errors in your writing. 12. _____
- a. True
 - b. False
13. True or false. When being descriptive, it is always best to use as many words as possible. 13. _____
- a. True
 - b. False
14. Identify which sentence is written without unnecessary words. 14. _____
- a. It is apparent that extra words have the end result of boring the reader.
 - b. Extra words bore the reader.
15. In general, it is best to write using _____ voice. 15. _____
- a. Active
 - b. Passive
16. Identify which sentence is written using active voice. 16. _____
- a. Clear writing demonstrates proper grammar.
 - b. Proper grammar is demonstrated in clear writing.
17. During the planning step of the writing process, you should follow the GAD process. What are the steps of the GAD process? 17. _____
- a. Gather, assess, and define
 - b. Gather, abridge, and describe
 - c. Generate, append, and describe
 - d. None of the above
18. During the organization step of the writing process, you should determine the 5Ws and collect details for each. Which of the following is not one of the 5Ws? 18. _____
- a. Who
 - b. What
 - c. Which
 - d. Why
19. True or false. When drafting your NR, you should edit as you write. 19. _____
- a. True
 - b. False
20. Which of the following are steps in the writing process? 20. _____
- a. Plan
 - b. Organize
 - c. Write
 - d. Edit
 - e. All of the above



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