

Quality Assurance Inspector Program

I. PURPOSE

The Agricultural Marketing Service (AMS), Livestock, Poultry and Seed Program (LPS), Quality Assessment Division (QAD), recognizes the Quality Assurance Inspector (QAI) Program as a supplement to the traditional-based voluntary shell egg grading program. In high volume facilities where it is impractical for one grader to perform all of the required certification duties, a QAI program can be utilized. A designated company employee other than the plant owner, manager, foreman, or supervisor, may be authorized by USDA and company officials to work alongside the USDA grader to examine product quality, monitor the labeling, dating, and lotting of officially graded shell eggs. The QAI will work in conjunction with the USDA grader to assure the quality of officially identified product; duties may include monitoring of processing and packaging procedures, accurate container identification (labeling, code dates, specification requirements, etc.) and storage requirements. The QAI's primary function is to help assure that all officially certified product identified with the USDA grademark complies with U.S. regulations, standards and applicable commercial/export specifications.

Product which is identified, or will be identified with the USDA grademark cannot be processed, packaged, or labeled without a USDA grader on duty. The grader is ultimately responsible for examining the minimum number of samples during a processing shift according to USDA online sampling plan procedures.

II. AUTHORITY

All U.S. standards, grades, and weight classes have been developed in accordance with and are promulgated pursuant to the authorities contained in the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.). The voluntary USDA shell egg grading program provides for interested parties a national shell egg grading service based upon official U.S. standards, grades, and weight classes for shell eggs. The costs involved in furnishing this grading program are paid for by the user(s) of the service.

III. OVERVIEW AND ELIGIBILITY

The QAI program is a voluntary arrangement between the QAD and a participating company/processing facility demonstrating effective in-house quality management practices. Under agreed upon conditions, the company/processing facility's QAI personnel will work with the USDA Grader in performing grading duties as determined by the USDA grader and Federal-State Supervisor. The USDA grader will continue to control grading stamps, issuance of official certificates, staging and sealing of transport containers (where applicable), and authorization to identify processed shell eggs with the official USDA grademark.

To be eligible for participation in the QAI program, it must be demonstrated by the USDA Grader/Federal-State Supervisor that due to the high volume of graded product, the workload for a single grader on a processing shift is excessive. With concurrence from the Regional Director and the company management, in order to maintain the integrity of the USDA grademark and to avoid the cost of an additional grader, a QAI program may be implemented.

Prior to implementation of the QAI program, a Declaration of Commitment statement (Exhibit I) must be signed by the company/processing facility's Chief Executive Officer (i.e. the person in the top management position of the subject company/processing facility) expressing the full support of the company and obligating them to commit the necessary resources in order to make the QAI program a success. The form will also be signed by the employee designated as the QAI expressing the same commitment to comply with applicable regulations, standards, and instructions that govern the certification of shell eggs.

A vital element to this agreement is to express the understanding that whenever the QAI is not available to assist the grader, the company will either reduce the volume of certified product to a manageable level or arrange for an additional USDA grader.

GENERAL REQUIREMENTS

A company/processing facility currently utilizing the USDA grading service is capable of participating in the QAI program subject to the following general requirements:

- A. The staff, equipment, and processing and operational procedures are capable of producing product that meets all requirements of the U.S. regulations, identified U.S. grade standards, applicable product specifications (Commercial and Export), and the Shell Egg Graders Handbook instructions.
- B. The company/processing facility maintains a current contract and established Tour of Duty for voluntary grading service performed by USDA, AMS.
- C. The company/processing facility must be current in their accounts payable – no delinquencies. The delinquency status will be verified through the Business Operations Branch of the Livestock, Poultry, and Seed Program.
- D. The company has committed to the implementation of the QAI program activities assigning qualified personnel to assist the USDA grader. The QAI must be informed that, under no circumstances, may officially identified shell eggs be shipped in commerce prior to verification by the USDA grader of product quality and compliance with USDA regulations. **Failure of the QAI to perform duties as agreed to, assuring product quality and compliance with U.S. Grade Standards, will result in the suspension of the program.**

When qualified QAI personnel are not available due to circumstances beyond the control of the company, USDA grading and certification activities will revert to traditional USDA grading procedures. The additional workload may cause delays in certification and shipment of product.

- A. During the times when the QAI is assisting the USDA grader, their time must be fully dedicated to assisting the USDA grader with certification duties. **Note:** During times when production volumes are high, the QAI personnel are to exclusively assist graders with excessive workloads. They are not to be performing other tasks assigned by the company while functioning as the QAI.
- B. If qualified QAI personnel are not available during an established tour of duty, all certification and verification activities revert back to the traditional grading program. In this case, the volume of certified product must be reduced to a manageable level or arrangements must be made for additional grading staff.

IV. QUALIFICATIONS FOR QAI POSITION

- A. Persons considered for a QAI position that includes product grading must have 6 months of experience as an egg candler. QAI applicants must pass a color blindness screening test administered by the Federal-State supervisor. The applicant must demonstrate the ability to interpret the U.S. Standards, Grades, and Weight Classes for Shell Eggs by passing a 1,000- egg comparative grading test (hand candling), with 95 percent accuracy administered by the Federal-State supervisor.
- B. To qualify for the QAI position, a company employee must satisfactorily complete the applicable portions of the USDA Shell Egg Questionnaire relative to the USDA regulatory requirements, sampling and grading procedures, and documentation of samples examined.
- C. Company employees recognized as qualified to perform QAI duties must acknowledge receipt of Public Law 272 (Egg Products Inspection Act), copies of the regulations (7 CFR Part 56), AMS 56 (U.S. Standards, Grades and Weight Classes for Shell Eggs, the Shell Egg Graders Handbook, and this instruction.

V. DUTIES AND RESPONSIBILITIES OF QAI

The QAI will assist the USDA grader with various certification duties according to the company's agreement establishing the program. However, fundamental to the program is the assistance provided to the USDA grader in monitoring the quality of the product identified with the USDA grademark, whether sampling graded product on-line or as a stationary lot. Listed below are some of the duties that may be assigned to the QAI to assist the USDA grader:

A. Product Grading

- a. The QAI will record sampling results on the Form PY-75 Grading Worksheet in conjunction with the results observed by the USDA grader when monitoring processing and packaging on-line. Total samples examined on each shift must equate to no less than 1 sample for each 75-cases (30-dozen equivalent) produced on each line.

EXAMPLE: If the QAI is assisting the USDA grader in the sampling of Grade AA Large, both should be recording their results sequentially on the same PY-75. For example, the USDA grader examines the first sample of the day and records results in column 1. The next two samples are examined by the QAI, these results would be recorded in columns 2 and 3. If the next sample is taken by USDA, results would be recorded in column 4, and so on.

- b. When sampling product, all unsatisfactory product must be retained. Once the product is retained, ensure it is properly identified, segregated, recorded on the “retained product log” and held for reworking or full sampling by the QAI or the USDA grader. **Note:** when the QAI is performing a stationary lot grading to release retained product, it must be conducted under the direct supervision of the USDA grader.

NOTE: Since the resident grader and the QAI will be working together to record sampling results on the same PY-75, any unacceptable sample, USDA or QAI, requires retention of all product packed since the last acceptable sample, USDA or QAI, was returned to the line.

- B. Verification of product labeling (production codes, expiration dates, marking ink legibility, etc.).

- C. When requested, assist the USDA Grader with pre-operational sanitary inspections and help monitor the sanitation of equipment/facility during operational hours. **Note:** pre-operational sanitation inspections may only be conducted by the USDA grader; QAI personnel may offer assistance if needed.

- D. Verify proper wash water temperatures are maintained and wash water is changed at required intervals.

- E. Verify final potable water rinse of the washing cycle is functioning properly, the sanitizing solution meets the appropriate concentration level, is adequately applied to the surface of the shell, and meets minimum temperature requirements.

- F. Record the ambient storage temperature in refrigerated storage areas and report a temperature exceeding 45 degrees F to plant management and the USDA grader.
- G. Assure all labeling material on product identified with the USDA Grademark has been approved and contains a label approval number (alpha-numeric) printed in a small rectangle on the principal display panel. Notify plant management of incorrect labeling of containers (production code, expiration date, plant number, etc.). Retain incorrectly labeled product or product packed in unapproved carton/case material. Document corrective action on the PY-75.
- H. Assure that segregated restricted eggs are properly labeled. Similarly, all inedible collection containers and containers for storage or shipment of inedible egg product must be labeled in accordance with the regulations and properly de-characterized.
- I. When plant management elects to shell coat eggs subsequent to washing, monitor the use of approved processed mineral oil, the spray application, and maintenance of sanitary operating conditions of the oiling system.

VI. RESPONSIBILITIES OF RESIDENT GRADER

- A. The primary responsibility of the resident grader is to assure program integrity by adhering to the Regulations Governing the Voluntary Grading of Shell Eggs, the United States Standards, Grades, and Weight Classes for Shell Eggs, and the Shell Egg Graders Handbook. **Note:** the QAI program is designed to assist the resident grader in facilities that produce excessively high volumes of certified product; but it is ultimately the responsibility of the resident grader to ensure the integrity of the grading program.
- B. The resident grader must assure that adequate samples are taken, and that samples are properly identified, numbered, and appropriately spaced. Between the resident grader and QAI personnel, there should be a cumulative total of no less than 1 sample for every 75 (30-dozen) cases, however the average sample interval for the resident grader should never exceed 150 cases. If at any time more than 100 cases are packed without a QAI or USDA sample, product from the last QAI or USDA sample to present would be set aside and require a stationary lot grading. The resampling of this product will not take precedence over the online duties.

Note: The QAI and the USDA grader(s) must initial their samples on the PY-75 to differentiate between them; this will make it possible for the resident grader to verify total sample rate (1 in 75), as well as USDA sample rate (1 in 150).

- C. On a spot-check basis, the resident grader is to verify that QAI sample results compare favorably with the USDA grader's results on the same line. Periodically throughout the shift, resident graders should compare the QAI samples with random samples they pulled from the same pallet of graded product, ensuring the sampling integrity. These sample results should be documented on a separate PY-75 and be kept in the USDA graders file for review by the Federal-State Supervisor.
- D. For each QAI, the resident grader is required to perform comparative grading selected from the cooler on a minimum of five previously graded samples each week. The grader is to record results on the cooler sample sheet.
- E. The resident grader must advise the Federal-State supervisor regarding any discrepancies which could compromise the integrity of the QAI online sampling program.

Note: While many duties performed by a resident grader can be shared with a QAI, certain functions are the sole responsibility of the USDA grader, such as issuing and signing official certificates (the QAI may prepare the certificate), the control of USDA grading stamps, sealing of trucks (if applicable) and pre-operational sanitation inspections.

VII. RESPONSIBILITIES OF FEDERAL-STATE SUPERVISOR

- A. The Federal-State supervisor must evaluate the effectiveness of the plant's QAI program(s) during each quarterly supervisory visit and document on Form PY-227 any deficiencies noted or reported by the resident grader and the corrective action to be taken, if applicable.
- B. The Federal-State supervisor is to evaluate the grading abilities of the QAI during regularly scheduled quarterly visits. Depending on the tasks assigned to the QAI, the supervisor will assess the overall program knowledge relating to the specific tasks and will document any deficiencies on a PY-227. In addition, if the QAI is used to perform grading and certification of product, a full shell egg comparative will be used to assess these capabilities.

Note: if major deficiencies are noted during supervisory reviews of the QAI, the Federal State Supervisor will write a letter to the company's top management with a copy to the Regional director. The Federal-State Supervisor will consider suspension of the authorization for a QAI program when reported and/or observed deficiencies in the program impact the determination of the quality of product

VIII. REMOVAL OF INDIVIDUAL QAI'S FOR UNSATISFACTORY PERFORMANCE

- A. An employee's authorization to serve as a QAI may be rescinded under the following conditions: failure to consistently carry out applicable assigned responsibilities as listed in the Shell Egg Graders Handbook and failure to consistently make accurate quality determinations as evidenced by comparative grading's by the USDA grader and/or Federal-State supervisor.
- B. Plant management is to be advised when any QAI's authority is rescinded.

IX. TERMINATION OF QAI PROGRAMS

- A. QAI programs may be terminated at any time by plant management upon written or verbal notice to the resident USDA grader or Federal-State Supervisor. **Note:** upon termination, certification services will revert back to traditional grading and volume levels must be adjusted accordingly.
 - a. If voluntarily terminated, a plant may request reinstatement within 6 months at the discretion of the Regional Director. The same person(s) previously qualified as QAI's may be reinstated upon satisfactory completion of a shell egg comparative grading and demonstrating adequate retention of general grading knowledge. If more than 6 months have elapsed, or if new person(s) are nominated for the QAI positions, a full 1,000-egg comparative grading and completion of the shell egg questionnaire is required.
- B. The QAI Program may be suspended or authorization rescinded by USDA for deficiencies that indicate a lack of company commitment to the program, failure of the competency of the QAI, or a lack of cooperation by plant management. Such infractions include, but are not limited to:
 - a. Failure to make authorized QAI's available as needed to meet minimum online sampling requirements.
 - b. Interference or attempts by plant management or other personnel to influence QAI's in the performance of their duties.
 - c. Failure to notify the USDA grader or Federal-State supervisor when officially identified product is to be packed without a grader on duty.

Upon determination by the Federal-State supervisor that sufficient evidence exists to terminate a QAI program, the plant is to be notified in writing. Depending on the seriousness of the

situation, verbal notice may be given of the immediate termination of the program. Termination action shall not be taken without the concurrence of the Regional Director. The Federal-State supervisor's letter will state the specific reason(s) for the termination. If terminated by USDA, the QAI program may not be reinstated without company management giving written assurance identifying necessary corrective action and demonstrating implementation of that corrective action. Reinstatement is contingent upon the Regional Directors concurrence.

DECLARATION OF COMMITMENT

The Declaration of Commitment by Top Management is a mandatory statement signed by the Chief Executive Officer of the company/processing facility to formalize the agreement with the Quality Assessment Division, to express the full support of the company for the requirements of the Quality Assurance Inspector (QAI) Program.

I, _____
(Management Official)
(Print Name and Title)

declare that the designated company employee(s) listed below will be afforded the necessary training and full support of company management to participate in the QAI program which will ensure that all products and processes included in the scope of the program will meet all requirements of the regulations (including U.S. Grade Standards), applicable product specifications, and related instructions. When performing QAI responsibilities, the employee will be solely committed to assisting the USDA grader with assigned duties. If the QAI is needed for duties not related to official certification of product, and is not able to assist the USDA grader with certification duties, the company agrees to reduce the volume of officially certified product to a manageable level so that the available USDA grading staff can manage the workload.

Designated Quality Assurance Inspector(s)

(Print Name and Title) (Signature)

(Print Name and Title) (Signature)

Signed, _____ on _____.
(Management Signature) (Date)