

Methods of Making Sanitation Ratings of Milk Shippers

1999 Revision



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PREFACE

The objective of a rating is to provide an assessment of state and local sanitation activities regarding public health protection and milk quality control. This is accomplished by evaluating sanitation compliance and enforcement standards of the *Grade "A" Pasteurized Milk Ordinance--1978 Recommendations of the United States Public Health Service/Food and Drug Administration (1999 Revision)*, and related documents as listed in Section I of the *Procedures Governing the Cooperative State-Public Health Service/Food and Drug Administration Program for Certification of Interstate Milk Shippers*. Rating results are used for the purpose of evaluating the sanitation compliance and enforcement requirements of shippers to determine the degree of compliance with public health standards as expressed in the *Grade "A" Pasteurized Milk Ordinance (PMO)*. Rating results are further utilized as a means of uniform education and interpretation in addition to providing a basis for the acceptance/rejection of shippers by public health officials beyond the limits of routine inspection. Rating results are intended to establish uniform reciprocity between states to prevent unnecessary restrictions of the interstate flow of milk and milk products, yet assure public health protection.

The rating method for evaluating the sanitary quality of milk measures the extent to which a shipper complies with standards contained in the *GRADE "A" PMO*. These nationally recognized standards--rather than local requirements--are used as a yardstick in order that ratings of individuals BTUs or attached shippers and milk plants may be comparable to each other, both interstate and intrastate. Ratings are expressed in terms of percentage compliance. For example, if the milk plant and dairy farms comply with all of the requirements of the *GRADE "A" PMO*, the sanitation compliance rating of the pasteurized milk supply would be 100 percent: whereas, if the plant or some of the dairy farms fail to satisfy one or more of these requirements, the pasteurized milk rating would be reduced in proportion to the amount of milk and milk products involved in the violation and to the relative public health significance of the violated items. Procedures for collection of data, computation of sanitation compliance ratings for raw milk for pasteurization and pasteurized milk, and computation of the enforcement rating of the milk regulatory agency responsible for administering milk sanitation regulations are described in the following sections.

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METHODS OF MAKING SANITATION RATINGS OF SHIPPERS

A. DEFINITIONS OF TERMS

Terms used in this document not specifically defined herein are those within *Title 21 Code of Federal Regulations* and/or the *Federal Food, Drug and Cosmetic Act*.

1. AREA RATING. An area rating, if used, shall apply to raw milk for pasteurization only. An area rating consists of more than one producer group operating under the supervision of a single regulatory agency and which is rated as a single entity.

2. INDIVIDUAL RATING. An individual rating is the rating of a single producer group, receiving station, transfer station and/or milk plant under the supervision of a single regulatory agency.

3. ENFORCEMENT RATING. This is a measure of the degree to which enforcement provisions of the *Grade "A" Pasteurized Milk Ordinance (PMO)* are being applied by the regulatory agency.

4. CERTIFIED MILK SANITATION RATING OFFICER. A state employee who has been standardized by the *Public Health Service/Food And Drug Administration (PHS/FDA)*, has a valid certificate of qualification and does not have direct responsibility for the routine inspection and enforcement of the shipper to be rated. Directors, Administrators, etc. may be certified as state milk sanitation rating officers.

5. BULK TANK UNIT (BTU). A dairy farm or group of dairy farms from which raw milk for pasteurization is collected under the routine supervision of one regulatory agency

and rated as a single entity and given a sanitation compliance and enforcement rating.

6. REGULATORY AGENCY. A regulatory agency shall mean an agency which has adopted an ordinance, rule or regulation in substantial compliance with the current edition of the *GRADE "A" PMO* or *Grade "A" Condensed and Dry Milk Products and Condensed and Dry Whey – Supplement I to the Grade A Pasteurized Milk Ordinance (DMO)* as applicable, or two (2) agencies which have mutually agreed to share the responsibilities for the enforcement of an ordinance, rule or regulation in substantial compliance with the *GRADE "A" PMO* or *GRADE "A" DMO* as applicable for a listed interstate milk shipper. The mutual agreement shall specify the details of how the rating will be made so long as the details do not conflict with the basic intent of this document.

7. DAIRY FARM. A dairy farm is any place or premises where one or more lactating animals (cows, goats or sheep) are kept for milking purposes, and from which a part or all of the milk or milk product(s) is provided, sold or offered for sale to a transfer station, receiving station or milk plant.

8. MILK PLANT. A milk plant is any place, premises, or establishment where milk or milk products are collected, handled, processed, stored, pasteurized, aseptically processed, packaged, or prepared for distribution.

9. TRANSFER STATION. A transfer station is any place, premises, or establishment where milk or milk products are transferred directly from one milk tank truck to another.

10. RECEIVING STATION. A receiving station is any place, premises, or establishment where raw milk is received, collected, handled, stored or cooled and prepared for further transporting.

11. RECIPROCITY. For the purposes of the *National Conference on Interstate Milk Shipments (NCIMS)* agreements, reciprocity shall mean no action or requirements on the part of any regulatory agency will cause or require any action in excess of the requirements of the current edition of the *GRADE "A" PMO* and related documents of the *NCIMS* agreements.

B. RATING METHODS FOR RAW MILK FOR PASTEURIZATION

1. DRUG RESIDUE COMPLIANCE, PROCEDURE FOR DETERMINING BTU OR ATTACHED SUPPLY COMPLIANCE WITH APPENDIX N OF THE GRADE "A" PMO.

During an *INTERSTATE MILK SHIPPERS' (IMS)* rating or check rating, it is necessary to determine compliance of the BTU with the requirements of Appendix N of the *GRADE "A" PMO*. The following criteria are to be used in making that determination. If the BTU or attached supply is not in substantial compliance, a rating or check rating is not to be completed and the State Rating Agency shall immediately withdraw *IMS* certification.

(a) Record Review.

Determine from records that are stored in a manner acceptable to the rating agency that all milk pick-up tankers are screened daily prior to processing for beta lactams with an approved test method; as necessary, determine that all producers are randomly tested 4 times in any consecutive 6 months

for other drug residues if directed by M-a-75.

Compliance with the above item would be satisfied in the following manner:

(1) Records indicating that milk was always shipped to an IMS listed shipper will suffice for actual test results.

(2) If milk is shipped to a non-listed plant, records indicating actual testing must be provided or available for review. When the state regulatory agency has determined adequate documentation for compliance with this section exists, the rating agency may accept this documentation. The responsible rating officer may at their discretion request records on the testing of loads of milk that are sent to non-listed plants.

If records are requested, the rating officer should choose and request to review records for no more than 15 days unless these selected records show a problem.

(b) Notification and Disposition.

If a load sample or individual producer sample is positive for a drug residue, determine if the regulatory agency was immediately notified of the method of proper disposition to keep contaminated milk out of the food chain.

(c) Reinstatement.

Determine if the violative producer was not allowed to ship milk until the milk no longer tested positive for drug residues.

2. COLLECTION OF DATA.

Data from which the ratings are determined are obtained by the State Milk Sanitation Rating Officers from the records on file with the milk regulatory agency, and from the

evaluation of sanitary practices and facilities at the dairy farms. It is not necessary, except on very small milksheds, to inspect all dairy farms since a sufficiently accurate determination of the percentage compliance with the sanitation requirements can be determined by surveying statistically selected dairy farms.

(a) Number of Dairy Farms to be Rated

(1) The minimum number of dairy farms to be included in the rating depends upon the number in the area to be rated and the accuracy desired. To obtain an accuracy such that the probable error in the individual percentages of compliance with the various items of sanitation will be less than 5 percent, the minimum number of dairy farms selected at random for inspection during the rating shall be taken from Table 1.

TABLE 1

MINIMUM NUMBER OF DAIRY FARMS TO BE SELECTED AT RANDOM FOR INCLUSION IN A RATING.

Number in BTU or attached supply	Number to be rated
1 to 24	all
25 to 54	25
55 to 59	26
60 to 64	27
65 to 71	28
72 to 78	29
79 to 86	30
87 to 94	31
95 to 105	32
106 to 116	33
117 to 130	34
131 to 147	35
148 to 167	36
168 to 191	37

192 to 222	38
223 to 262	39
263 to 316	40
317 to 394	41
395 to 514	42
515 to 725	43
726 to 1,192	44
1,193 to 5,000	50
5,001 to 10,000	100
10,001 to over	200

(2) The preceding table is used to determine separately the number of dairy farms to be included in the rating. The probable error is not applicable to small samples. If the total number is 25 or less, the entire number must be rated.

(b) Random Selection of Dairy Farms to be Rated

The individual dairy farms included in the rating must be representative to reflect conditions throughout the BTU or attached supply. It is important that the selection method excludes elements of pre-selection and provides a truly random sample. The selection of farms for a rating should be made from a current listing of producers making up the BTU or attached supply and may be compared to a list for the previous 60 days to determine if an appreciable shifting of producers has taken place. Random selections, once made, should be deviated from only in cases of emergencies. Replacements, where necessary, should also be selected at random. Whenever possible, random selection or announcements of such selections for only one day's work at a time should be made. Examples of methods, which are satisfactory for the random selection for dairy farms, include the following:

(1) The name of each dairy farm in the BTU or attached supply is written on a small card, one name per card. These cards are then thoroughly shuffled and the number of

dairy farms to be included in the rating as determined from the table in 2.a. (1) above is selected.

(2) The selection of dairy farms is made at intervals from a complete card index, ledger record, or other list. When this method is used, the sequence interval chosen must be such that the entire card index, ledger record, or other list is subject to the sampling method. The sequence interval may be determined by dividing the total number of dairy farms by the number needed for the rating. For example: if there were 293 dairy farms in the BTU or attached supply, Table 1 in 2.a. (1) above indicates that 40 will be included in the rating and the sequence interval in this case would be every seventh dairy. The first dairy farm in sequence is picked at random from the complete index or list in order that chance alone determines the selection of individual names.

(3) Immediately prior to the initial random drawing of dairy farms to be selected for inclusion in a rating, every producer, which produces 40% or more of the volume of milk in a BTU, which consists of 5 producers or more, must become a separate BTU.

(c) Recording of Inspection Data

(1) During a rating, inspection data are recorded on the form FDA 2359a, "Dairy Farm Inspection Report," the items of which correspond to the items of sanitation in Section 7 of the *GRADE "A" PMO*.

(2) Sanitary conditions are evaluated in terms of the requirements of Section 7 of the *GRADE "A" PMO*. Professional judgement alone must dictate whether an observed deficiency is representative of day-to-day significant conditions or is an anomaly. When significant violations of any given requirement are noted, the corresponding

items or subitems on the individual dairy farm inspection form are marked with an "X". Each subitem found in violation should be carefully marked, as this affects the computation of the sanitation compliance rating. The number of pounds of milk sold daily is needed for computing the rating and is entered in the appropriate place at the top of each sheet.

Note: A deficiency should not be based entirely on discussion held with a farm employee. Confirmation of a deficiency should be made with responsible owner or manager in charge.

(d) Recording of Laboratory and Other Test Data

(1) Records on file with the regulatory agency are used in determining compliance with bacterial, drugs, somatic cell, and temperature requirements. The acceptance of data from official or officially designated laboratories is contingent upon the utilization of standard procedures by the laboratories concerned. Accordingly, it is necessary for the Milk Sanitation Rating Officer to determine from the Official State laboratory-certifying agency that both sampling and laboratory procedures have been approved in accordance with the methods of *Evaluation of Milk Laboratories, 1978 Recommendations of the United States Public Health Service/Food and Drug Administration (1995 Revision) (EML)*. Rating shall not be conducted when an approved laboratory is not utilized by the regulatory agency for the necessary tests.

(2) Compliance with drug residue, bacteria, somatic cell, and cooling temperature requirements is based on whether, at the time of the rating, a dairy farm meets the standards of Section 7 of the *GRADE "A" PMO*. Credit for bacteria, somatic cell and cooling requirements shall be given if no more than two of the last four sample results

exceed the limits. *Provided*, that the last sample result is within the limit. No credit for compliance with drug residue, bacterial, somatic cell and cooling temperature shall be given when less than the required number of samples have been examined during the preceding 6 months. For rating purposes, the preceding 6 months is considered to be the elapsed period of the month in which the rating is made and the preceding 6 months. Dairy farms which have had a permit for less than 6 months at the time of the rating and for which the regulatory agency has not yet examined the required number of samples, shall be given credit: *Provided* that the last sample result is within the limits.

(3) The Milk Sanitation Rating Officer may utilize the milk regulatory agency records in determining compliance with those items of sanitation which require laboratory tests to complete the evaluation.

3. COMPUTATION OF SANITATION COMPLIANCE RATINGS

a. Rating results are transferred to the computation form, FDA 2359k, "Status of Raw Milk for Pasteurization." These forms may be obtained from the regional offices of the *PHS/FDA*. The form is sufficiently flexible to permit various combinations of pages to be used for reporting ratings of area or individual shippers.

b. The identity of each dairy farm included in the rating and the total pounds of milk sold daily expressed to the nearest 100 pound unit (cwt.) (e.g., 3,760 pounds per day will result in an entry of 38 in column A) are entered in the first and second columns, respectively, of form FDA 2359k. Violations of items or subitems are indicated by an "X" in the appropriate columns. The sum of the weights of all items and subitems found violated at each dairy farm is entered in the column headed "Total Debits" (column B). This figure is then multiplied

by the number in column A (Pounds Sold Daily-Nearest cwt.) and the results entered in column C entitled "Pounds Sold Daily (100 pound units) X Total Debits". When all entries have been made, the figures entered in this column are totaled as are the number of pounds sold daily by all the dairy farms rated. (See Section H, # 8 for example.)

c. The sanitation compliance rating is derived from the following formula:

Rating = $100 - (\text{Sum of Column C [cwt. Sold Daily X Total Debits]}) \div (\text{Sum of column A [cwt. Sold Daily]})$. This rating figure is entered in the appropriate space on the upper right hand corner of the page. It is also entered in the "Report of Milk Sanitation Ratings", FDA 2359j.

d. Provision is also made on the form for computing the percentage of dairy farms violating individual items of sanitation. The number of dairy farms violating each item may be totaled and the percentage computed by dividing this number by the total number of dairy farms rated and then multiplying by 100. The percentage of producers violating an item may also be determined by using the "Table for Computing Percent Violations". (Page 47).

C. RATING METHODS FOR TRANSFER STATIONS, RECEIVING STATIONS, AND MILK PLANTS

1. DRUG RESIDUE COMPLIANCE, PROCEDURE FOR DETERMINING TRANSFER STATION, RECEIVING STATION AND MILK PLANT COMPLIANCE WITH APPENDIX N OF THE GRADE "A" PMO.

During an IMS rating or check rating, it is necessary to determine compliance of the transfer station, receiving station, and processing plant with the requirements of Appendix N of the *GRADE "A" PMO*. The following criteria are to be used in making that determination. If the transfer station, receiving station and milk plant are not in substantial compliance, a rating or check rating is not to be completed and the State Rating Agency shall immediately withdraw IMS certification.

(a) Record Review.

Determine from records that are stored in a manner acceptable to the rating agency that all milk pick-up tankers are screened daily prior to processing for beta lactams with an approved test method; as necessary, determine that all producers are randomly tested 4 times in any consecutive 6 months for other drug residues if directed by M-a-75.

Transfer stations, receiving stations and milk plants having an attached supply with loads that occasionally are diverted by direct farm shipment shall be deemed in compliance if the following criteria are met:

(1) Records indicating that milk was always shipped to an IMS listed shipper will suffice for actual test results.

(2) If milk is shipped to a non-listed transfer station, receiving station and/or milk plant, records indicating actual testing must be provided or available for review. When the regulatory agency has determined adequate documentation for compliance with this section exists, the rating agency may accept this documentation. The responsible rating officer may at their discretion request records on the testing of loads of milk that are sent to non-listed plants.

(b) Regulatory Notification.

If a load of milk was found to have a positive drug residue, determine if the regulatory agency was properly notified.

(c) Industry Notification.

If a load of milk was found to have a positive drug residue, determine if the holder of the BTU or attached supply permit that the farms are attached to was properly notified.

2. COLLECTION OF DATA

Data from which ratings are determined are obtained by State Milk Sanitation Rating Officers from the records on file with the milk regulatory agency and from an evaluation of sanitary practices and facilities at milk plants, transfer stations, and receiving stations. Receiving stations and transfer stations may be considered as an integral part of the milk plant to which milk is shipped. Therefore, all such stations not having individual ratings and supplying the plant selected for rating must be included. Receiving stations and/or transfer stations, which are not an integral part of a milk plant, shall have individual ratings and may be rated, separate from their BTU's.

(a) Recording of Inspection Data

(1) During a rating, inspection data are recorded on the form "Milk Plant Inspection Report," FDA 2359. The items of this form correspond to the items of sanitation in Section 7 of the *GRADE "A" PMO*.

(2) Sanitary conditions are evaluated in terms of the requirements of Section 7 of the *GRADE "A" PMO*. Professional judgment alone must dictate whether an observed deficiency is representative of day-by-day sanitary conditions or is an anomaly. When significant violations of any given

requirement are noted, the corresponding items or subitems on the individual milk plant inspection form are marked with an "X". Each Subitem found in violation should be carefully marked, as this affects the computation of the sanitation compliance rating.

(3) The average number of pounds of milk and milk products processed daily is needed for computing the rating and is entered in the appropriate place at the top of the "Milk Plant Inspection Report," FDA 2359. When a deficiency in a milk plant affects only one type of packaging (paper; glass; single-service plastics; multi-use plastics; dispenser; cottage cheese; sour cream or yogurt containers) or the capping of these containers, or an individual pasteurization unit used (HTST, HHST, aseptic, or vat), only the quantity of all products affected by the deficiency, rather than the entire plant output, is recorded for use in the computation of the plant sanitation compliance rating. Only violations of Items 16p, 18p and 19p of the *GRADE "A" PMO* are to receive partial debits. *Provided* that bacterial and Coliform counts may be partially debited for the particular product involved. All other violations should be considered as affecting the entire product output of the milk plant.

(b) Recording of Laboratory and Other Test Data

(1) Regulatory agency records are used in determining compliance with bacterial, Coliform, phosphatase, drug, and temperature requirements. The acceptance of data from official or officially designated laboratories is contingent upon the utilization of standard procedures by the laboratories concerned. Accordingly, it is necessary for the Milk Sanitation Rating Officer to determine from the Official State laboratory-certifying agency that both sampling and laboratory procedures have

been approved in accordance with the methods of the *EML*. Ratings shall not be conducted when an approved laboratory is not utilized by the regulatory agency for the necessary tests.

(2) Compliance with requirements for bacterial counts, Coliform counts, and cooling temperatures is based on whether, at the time of the rating, a plant's products meet the standards of Section 7 of the *GRADE "A" PMO*. Each product (including commingled raw milk prior to pasteurization) in each of these categories shall be debited if 2 of the last 4 sample results exceed the limits, and the last sample result is in violation. A debit shall be given when less than the required number of samples has been examined during the preceding 6 months. For rating purposes, the preceding 6 months is considered to be the elapsed period for the month in which the rating is made and the preceding 6 months. Milk plants which have had a permit for less than 6 months at the time of the rating and milk or whey drying plants which do not operate on a year round basis and for which the regulatory agency has not yet examined the required number of samples shall not be debited. *Provided* that the last sample result is within the limit.

(3) The Milk Sanitation Rating Officer may utilize regulatory agency records in determining compliance with those items of sanitation which require laboratory tests to complete the evaluation. Official records of field tests may also be used in lieu of performing such tests during the rating. *Provided* that the Milk Sanitation Rating Officer is satisfied as to the competency of the regulatory agency personnel to perform these tests as described in Appendix I of the *GRADE "A" PMO*.

3. COMPUTATION OF SANITATION COMPLIANCE RATINGS

a. Rating results are transferred to the computation form, "Status of Milk Plants," FDA 2359L, which may be obtained from the regional offices of the Public Health Service/Food and Drug Administration. The name of the plant and the total pounds of milk and milk products processed daily (expressed to the nearest 100 pound unit [cwt.], e.g., 86,340 pounds per day will be an entry of 863) are entered in the first and second columns, respectively. If the plant's daily output varies, the daily average (based on actual operating days) for the week preceding the rating is used to calculate pounds processed daily. Violations of items or subitems are indicated by an "X" in the appropriate column. When a deficiency in a milk plant affects one type of packaging, capping, or individual pasteurization unit used the number of pounds of all products so packaged or pasteurized are debited. In such cases, entries are made on separate lines below the name of the plant concerned. The name or names of the product(s) affected by the violation(s) of Items 16p, 18p, and 19p, or the bacterial or Coliform standards of the *GRADE "A" PMO* is entered in the first column together with a parenthetical entry of the total volume in 100 pound units (cwt.) of the product(s) involved. Care must be taken not to enter this quantity in the second column where it would again be included in the total pounds processed daily. (See Section H, # 9 and 10 for examples.)

b. For receiving or transfer stations operated by the plant and under the same routine supervision as the plant and shipping to the plant, the name of the station is entered in the first column, together with a parenthetical entry of the hundredweight (cwt.) shipped daily. No entry is made in the second column (column A).

If the pounds shipped daily by a station to the milk plant varies, the recorded quantity is the daily average (based on actual operating days) of the shipments for

the week preceding the rating. Violations of items or subitems are indicated by an "X" in the appropriate following column(s). To facilitate the rating computations, receiving station's or transfer station's entries follow the entries for the milk plant. If the rating of the receiving station or transfer station is equal to, or higher than, that of the milk plant, or equal to 90 percent or higher, the milk plant rating is considered as being inclusive of the receiving station(s) or transfer station(s) violations and no entry is made in the "Total Debits," column B, for the station. However, if the receiving station or transfer station rating is less than 90 percent and lower than the plant, it is subtracted from the rating of the milk plant(s) which it supplies and the difference is entered in the "Total Debits" column B.

This difference is then multiplied by the quantity of milk shipped daily by the receiving or transfer station to the milk plant and entered in the column headed "cwt. Processed Daily X Total Debits," column C. (See Section H, # 11 for examples of these calculations.)

c. The computation procedure for a milk plant is similar to that for dairy farms, except that a modified procedure is necessary in computing debits for violations involving only one type of packaging, capping or individual pasteurization unit, or individual products violating the bacterial or Coliform standards and for violations involving receiving or transfer stations (where the latter is explained in the preceding paragraph). For such violations, the entry in column B, "Total Debits," is multiplied by the actual number of pounds of product involved, as entered parenthetically in the first column, rather than by the entire plant output from column A. This figure is entered in column C, "cwt. Processed Daily X Total Debits." The formula for determining the sanitation

compliance rating for the milk plant is as follows:

Rating = 100 - (Sum of column C [cwt. Processed Daily X Total Debits]) divided by (Sum of column A [cwt. Processed Daily]).

d. This rating figure is entered in the appropriate space in the upper right hand corner of the form entitled "Status of Milk Plants," FDA 2359L. It is also entered on the form entitled "Report of Milk Sanitation Rating," FDA 2359j, in the appropriate place.

e. The name(s) of the bulk tank unit(s), receiving station(s) and/or transfer station(s) shipping into the milk plant, which are separately rated and listed are also entered in the first column below the name of the plant but the quantity of milk supplied daily is entered parenthetically in the same manner as for locally supervised stations. The poundage is not recorded in the second column (column A) since this quantity is already accounted for in the milk plant figures. If the rating for the transfer station(s) and/or receiving station(s) is equal to, or higher than that of the milk plant, the plant rating is considered as being inclusive of the station(s) violations, therefore, no entry is made in column B, "Total Debits." However, if the receiving station(s) and/or transfer station(s) rating is less than 90 and lower than that of the milk plant, the difference is entered in column B, "Total Debits." This difference is then multiplied by the number of pounds shipped daily by the receiving station(s) and/or transfer station(s) to the milk plant and entered in column C entitled "cwt. Processed Daily X Total Debits."

f. If, upon receipt, one or more shipper(s) of unattached raw milk for pasteurization violates bacterial, and/or cooling requirements, the violations are debited against the rating of the receiving station(s)

and/or transfer station(s) shipping the milk prior to combining the ratings in accordance with the methods described above.

D. COMPUTATION OF ENFORCEMENT RATINGS

1. PURPOSE.

a. The form, FDA 2359j, consists of two parts. The "Report of Milk Sanitation Rating" is on the front side and the "Report of Enforcement Methods" is on the back. (See Section G, # 1 and 2 for an example of these forms.) This form provides a means of measuring the degree to which the enforcement provisions of the *GRADE "A" PMO* are being applied by the regulatory agency. It serves to delineate specific areas where a milk sanitation program needs strengthening. The rating method provides for separate appraisals of these provisions as they are applied to dairy farms and milk plants. In some cases, the enforcement rating is derived by combining these appraisals with an appraisal of other regulatory actions for which the milk regulatory agency is responsible.

b. Appraisal of items is based on the Milk Sanitation Rating Officer's observations during the rating and his/her review of the regulatory agency's records for the lesser of the following periods:

(1) The period since the last rating, but not less than 6 months or,

(2) The 2 years preceding the date of the current rating.

c. Enforcement rating scores shall be computed utilizing Appendix A, (Guidelines for Computing Enforcement Ratings) (See Page 49).

d. The enforcement rating applies directly to the individual regulatory agency; therefore, there are no provisions for combining the enforcement ratings of two or more enforcement agencies. Enforcement ratings shall be made in accordance with the procedures in the following paragraphs.

e. For rating purposes, to determine inspections have been made at the established frequency, the interval shall include the designated period plus the remaining days of the month in which the inspection is due.

2. RAW MILK FOR PASTEURIZATION ONLY

a. When an individual shipper offers for sale only raw milk for pasteurization directly from dairy farms, known as a bulk tank unit, (there are no receiving/transfer stations, or plant involved) all items in Part I, FDA 2359j should be evaluated. The total of the credit column of Part I will be the enforcement rating and should be recorded on page 1 of this form in the appropriate place. (See Section H # 6 and 1 for examples).

b. When an item requires separate action on the part of the regulatory agency with respect to each dairy farm, compliance is prorated on the proportion of dairy farms included in the rating for which official records show the item to have been satisfied. When an item requires an action by the regulatory agency that affects the entire program, quantitative estimates of compliance by the above-described procedure are not applicable. These items have the percent complying column of the schedule blocked out and the full weight of the items is debited or credited, depending upon whether the milk sanitation program is satisfying the pertinent provisions of the *GRADE "A" PMO*. In appraising these items, the Milk Sanitation Rating Officer's

judgement should be based on the attainment of objectives toward which the provisions of the appropriate sections are directed and not on occasional circumstances or insignificant deviations in procedure. (See Section H, #6 for example).

c. For rating purposes, to determine if inspections have been made at the established frequency, the interval shall include the designated period plus the remaining days of the month in which the test is due.

d. For dairy farms inspected under the provisions of Appendix P the following rating criteria applies:

1. At each 3-month categorization during the rating period, the previous 12-month producer records were used to determine the proper categorization of individual producers into 12, 6, 4 and 3-month inspection intervals.

2. Dairy farms were re-categorized properly every three months.

3. The due date for the next inspection is calculated from the date of the last routine inspection, unless, the due date was scheduled to occur before the re-categorization. However, the due date may be extended up to 30 days after the re-categorization date for producers assigned to a 3-month inspection frequency if the due date was scheduled to occur before the re-categorization date.

3. RECEIVING STATION OR TRANSFER STATION

a. When an individual shipper offers for sale raw milk for pasteurization which is shipped from a receiving station, transfer station, or milk plant with one or more dairy farms rated with it, all items in Part II (Milk Plants) except items 5, 7, 8, and all items in

Part III (Individual Shipper Rating) shall be evaluated. When a receiving station and/or transfer station receives and trans-ships raw milk for pasteurization from one or more rated and listed BTU's and wishes a separate listing for its facilities, all items in Part II except 5, 7 and 8, and all items in Part III except 1 shall be evaluated; The procedures outlined in 3.b and 4.a (3) should be followed in computing the enforcement rating of the receiving station and/or transfer station.

b. The total weight, which can be earned in Part II, is 65. Therefore, the sum of the total credits earned in Part II should be divided by 65 and multiplied by 100. For example: Assume that addition of all credits (omitting items 5, 7 and 8) under Part II equals 60. Then 60 divided by 65 multiplied by 100 equals 92.3 percent. Fractions of 0.5 or higher are increased to the next whole number and fractions of less than 0.5 are dropped. Under these rules, the 92.3 percent in this example would equal 92 percent. The sum of the credits in Parts I and II is transferred to Part III. The sum of the credits in Part III will be the enforcement rating of the regulatory agency. (See Section H, #4 for examples of these calculations).

c. When an item requires separate action on the part of the milk regulatory agency with respect to each receiving station or transfer station, compliance is based on the proportion of receiving stations or transfer stations that are included in the rating for which local records show the item to have been satisfied. If an item requires more than one test or determination (Part II, Items 2, 4, 6, 9, and 10), then compliance is also based on the proportion of tests or determinations which, according to local records, were made at the required frequency. For example: If only 6 of the required 8 inspections were made in the past 2 years, the compliance would be 6/8 or 75 percent.

d. When an item requires an action by the regulatory agency, which affects the entire control program, quantitative estimates of compliance by the procedure described in the preceding paragraph are not applicable. These items have the "Percent Complying" column of the schedule blocked out, and the full weight of the item is debited or credited, depending upon whether the program being rated is satisfying the pertinent provisions of the *GRADE "A" PMO*. In appraising these items, the milk Sanitation Rating Officer's judgement should be based on the attainment of objectives toward which the milk sanitation regulations are directed and not on occasional circumstances or insignificant deviations in procedure.

4. MILK PLANTS

(a) Milk Plant With Unattached Supply of Raw Milk

(1) When an individual shipper of pasteurized milk and milk products imports all raw milk for pasteurization from outside the jurisdiction of the regulatory agency in which the plant is located, only Part II and III of "Report of Enforcement Methods," FDA 2359j, page 2, shall be evaluated. If an item requires more than one test or determination (Part II, numbers 2, 4, 5, 6, 7, 8, 9, and 10), then compliance is also based on the proportion of tests or determinations which, according to local records, were made at the required frequency. For example: In an enforcement rating all required tests must be performed on each individual pasteurizer to receive credit. Compliance is determined by multiplying the number of pasteurizers (units) by the number of 3-month periods (quarters) in a rating period. For example, if a plant with 4 pasteurizers is rated over a 2 year span and 1 pasteurizer is not completely tested during 1 quarter, then compliance is calculated as: $4 \times 8 = 32$ Unit-Quarters, less one non-

complying quarter = $31/32 \times 15 = 14.5$ points.

For rating purposes, to determine if the required tests have been performed at the established frequency, the interval shall include the designated period plus the remaining days of the month in which the test is due.

(2) When an item requires an action by the regulatory agency, which affects the entire control program, quantitative estimates of compliance by the procedure described in the preceding paragraph are not applicable. These items have the "Percent Complying" column of the schedule blocked out, and the full weight of the item is debited or credited, depending upon whether the program being rated is satisfying the pertinent provision of the *GRADE "A" PMO*. In appraising these items, the Milk Sanitation Rating Officer's judgement should be based on the attainment of objectives toward which the milk sanitation regulations are directed and not on occasional circumstances or insignificant deviations in procedure.

(3) The utilization of milk from a separately rated source which has a milk sanitation compliance and/or enforcement rating which is not equal to 90 percent or higher is a violation of Section 11 of the *GRADE "A" PMO* and would be debited on Item 4, Part III, "Report of Enforcement Methods", Form FDA 2359j.

(4) When computing Part III, there will be zero credit in Item 1. It will be necessary to increase the weight for Item 2 to .90 to negate the zero credit in Item 1. Example: Total credit in Part II is 94 and Items 3 and 4 of Part III have full credit of 4 and 6 respectively, the calculations will be: $(94 \times .90) + 10 = 94.6$ or 95 percent enforcement rating. (See Section H, # 2 for example).

(b) **Milk Plant with Attached Supply of Raw Milk**

(1) When an individual shipper of pasteurized milk and/or milk products receives raw milk for pasteurization from within the jurisdiction of the regulatory agency in which the plant is located, Parts I, II, and III of "Report of Enforcement Methods," FDA 2359j, page 2 shall be evaluated. If raw milk for pasteurization is received from both attached and unattached supplies, only those sources from attached supplies will be evaluated in Part I. Milk from unattached supplies will be evaluated in Item 4, Part III. If an item requires more than one test or determination (Part II numbers 2, 4, 5, 6, 7, 8, 9, and 10) then compliance is also based on the proportion of tests or determinations which, according to local records, were made at the required frequency. For example: if, in an enforcement rating of a milk plant, only 8 of the required 10 individual dairy products had been sampled at the required frequency during the preceding required time period, the compliance would be 8/10 or 80 percent under Part II, number 7.

(2) When an item requires an action by the regulatory agency, which affects the entire control program, quantitative estimates of compliance by the procedure described in the preceding paragraph are not applicable. These items have the "Percent Complying" column of the schedule blocked out, and the full weight of the item is debited or credited, depending upon whether the program being rated is satisfying the pertinent provisions of the *GRADE "A" PMO*. In appraising these items, the Milk Sanitation Rating Officer's judgement should be based on the attainment of objectives toward which the milk sanitation regulations are directed and not on occasional circumstances or insignificant deviations in procedure.

(3) The utilization of milk from a separately rated source which has a milk sanitation compliance and/or enforcement rating which is not equal to 90 percent or higher is a violation of Section 11 of the *GRADE "A" PMO* and would be debited on Item 4, Part III, "Report of Enforcement Methods" Form, FDA 2359j.

E. PREPARATION OF RATING OFFICER'S REPORT

1. PURPOSE.

Ratings made by the methods described measure the degree to which the shipper and enforcement practices of a regulatory agency conform to the standards and procedures contained in the *GRADE "A" PMO*. Space is provided on the "Report of Milk Sanitation Rating," page 1 of FDA 2359j, for presenting a summary of rating results and recommendations of the Milk Sanitation Rating Officer.

2. SUMMARY OF RATING RESULTS

Sanitation compliance ratings computed in accordance with procedures previously described and other data pertinent to the shipper are entered in the "Summary of Rating Results." When the sanitation compliance rating of raw milk for pasteurization has been combined with the rating(s) of unattached supplies in accordance with the conditions and procedures found under "Preparation of Interstate Milk Shipper Reports" Section F.2.c. (2) or F.2.c. (3)(b); the combined rating, rather than the rating of the attached supply is entered in the summary.

3. SUPPLEMENTARY NARRATIVE REPORT

In the course of conducting a rating and computing ratings, additional facts may

become apparent which, if presented, would be of value to the regulatory agency in directing the local milk sanitation program so as to be more effective. Milk Sanitation Rating Officers are urged to prepare a supplementary narrative report of their rating findings. This report should include, but not be limited to, the following:

a. A statement regarding the general status of the milk sanitation program, including both strengths and weaknesses.

b. Discussion of needs for greater program emphasis as indicated by the compliance levels of sanitation items and enforcement practices found during the rating.

4. RECOMMENDATIONS OF THE MILK SANITATION RATING OFFICER

A summary of the narrative report, including the specific measures recommended for program improvement, is entered on page 1 of FDA 2359j, under the heading "Recommendations of Milk Sanitation Rating Officer." The full report should be discussed in detail with the appropriate officials of the regulatory agency. Such discussions contribute to better understanding of the problems involved and provide local regulatory agency authorities with an opportunity to discuss means of implementing the Milk Sanitation Rating Officer's recommendations. (See Section H, # 1 for example).

F. PUBLICATION OF INTERSTATE MILK SHIPPER REPORT

1. PURPOSE

a. *The Sanitation Compliance and Enforcement Ratings of Interstate Milk Shippers (IMS List)* is a biannual publication

of the Milk Safety Team, Food and Drug Administration, Washington, DC 20204. This is a part of the activities of the Food and Drug Administration in cooperation with the States in their joint program for certification of interstate milk shippers.

b. Triplicate copies of the "Interstate Milk Shipper Report," FDA 2359i (see Section G, # 6 for example), shall be submitted by the State to the appropriate regional office of the Food and Drug Administration for shippers who desire to be listed in the publication referred to in paragraph (a.) above. The biannual lists are published on the first day of January and July and the publication deadline for inclusion in the succeeding list is not later than the first day of the preceding month. Sanitation compliance ratings of a shipper are not published unless the written permission of the shipper concerned has been obtained by the State milk sanitation rating agency. One copy of this written permission should accompany each triplicate set of "Interstate Milk Shipper Report," FDA 2359i, submitted to the Food and Drug Administration Regional Office. Once a shipper has been listed, all new ratings must be submitted to the regional office even though the shipper has refused to sign a written permission for publication. Supporting sampling and laboratory certification reports, as specified in the *Procedures Governing the Cooperative State-Public Health Service/Food and Drug Administration Program for Certification of Interstate Milk Shippers*, are also necessary for inclusion and retention of the shipper on the list.

2. PREPARATION OF INTERSTATE MILK SHIPPER REPORT

(a) Individual Shipper of Raw Milk For Pasteurization

This shipper is commonly referred to as a bulk tank unit or BTU. Following

computation of the sanitation compliance rating, Form FDA 2359k, and Part I, "Report of Enforcement Methods," FDA 2359j, the resultant data will be transferred to the "Interstate Milk Shipper Report," 2359i (see Section G, # 6 for example). The earliest rating date shall be the date of the first day of the rating.

(b) Receiving Station or Transfer Station

Following computation of the sanitation compliance rating on forms FDA 2359k and FDA 2359L and Parts I, II, and III of "Report of Enforcement Methods," FDA 2359j, the resultant data will be transferred to the "Interstate Milk Shipper Report," FDA 2359i. The earliest rating date shall be the first day of the rating. When receiving and/or transfer stations who wish a separate listing and receive raw milk for pasteurization from one or more rated and listed BTU's for trans-shipment, the procedures to be followed shall be that of F.2.c. (2) or F.2.c. (3).

(c) Milk Plants

(1) ATTACHED SUPPLY ONLY

(Plant with a single source of raw milk, both under the jurisdiction of the same regulatory agency).

Following computation of the sanitation compliance rating on forms FDA 2359k and FDA 2359L and Parts I, II, III of "Report of Enforcement Methods," FDA 2359j, the resultant data will be transferred to the "Interstate Milk Shipper Report," FDA 2359i. The earliest rating date shall be the first day of the rating of the farms or plant whichever is earliest in time.

(2) ATTACHED SUPPLY AND UNATTACHED SUPPLIES

(Plant with source of raw milk for pasteurization under the jurisdiction of the same regulatory agency as the plant and one or more sources of raw milk for pasteurization from other separate rated and listed sources).

Following computation of the sanitation compliance rating on forms FDA 2359k and FDA 2359L and Parts I, II, III of "Report of Enforcement Methods," FDA 2359j, the resultant data will be transferred to the "Interstate Milk Shipper Report," FDA 2359i. (See Section G, #6 for an example). The earliest rating date and the raw milk sanitation compliance rating shall be computed by the following method.

All unattached supplies shall have a sanitation compliance rating of 90 percent or greater. The sanitation compliance rating of the attached supply shall be reported as the raw milk sanitation compliance rating for the plant. The earliest rating shall be reported on the "Interstate Milk Shipper Report," FDA 2359i. In addition, all unattached supplies, during the 30 days preceding the rating, along with the sanitation compliance rating and rating date of each source shall be listed on the reverse side of the "Interstate Milk Shipper Report," FDA 2359i. If milk is received from an unlisted source or from a source having a raw milk sanitation rating of less than 90 percent, the Food and Drug Administration Regional Office shall be notified and the plant shall be immediately withdrawn from the *Interstate Milk Shipper List*.

(3) ONLY UNATTACHED SUPPLIES

(Plant with one or more sources of raw milk received from other rated and listed sources).

Following computation of the sanitation compliance rating on the form FDA 2359L, and Parts II and III of "Report

of Enforcement Methods", FDA 2359j, the resultant data will be transferred to the "Interstate Milk Shipper Report," FDA 2359i. The earliest rating date and the milk sanitation compliance rating shall be computed by one of the two following options:

(a) Option 1. If all raw milk sources have a published (or submitted for publication) sanitation compliance rating of 90 percent or greater and the plant desires to be listed with the plant rating date, the raw milk will be reported as 90 percent or listed with an asterisk (*) which denotes all supplies are 90 percent or greater. This will eliminate the need for frequent updating of the form, FDA 2359i, by the State milk sanitation rating agency but certain precautions must be taken to insure that the raw supply remains at or above the listed 90 percent sanitation compliance rating. All sources of raw milk for the 30 days preceding the rating and their date of rating must be listed on the reverse side of the form, FDA 2359i. The plant shall be immediately withdrawn from the *Interstate Milk Shippers' List* when milk is received from an unlisted source or from a source having a raw milk sanitation compliance rating of less than 90 percent. The appropriate Food and Drug Administration Regional Office shall be immediately notified should either of the above events occur.

(b) Option 2. If the plant desires to be listed with the actual sanitation compliance rating of the raw milk (a weighted average of all raw milk sources), the requirements of the proceeding option shall also apply except that:

1) The earliest rating date of any of the raw milk sources or the plant, whichever is earliest in time, will be shown as the earliest rating date on the "Interstate Milk Shipper Report," FDA 2359i.

2) The raw milk sanitation compliance rating will be prorated on a weighted basis in a method similar to the following:

Supply SCR X Percent of Supply =

Unattached supply #1 95.0 X .20 = 19.0

Unattached supply #2 90.0 X .35 = 31.5

Unattached supply #3 92.0 X .45 = 41.4

Total = 91.9

Raw Milk SCR = 92%

The State Milk Sanitation Rating Officer shall re-compute the raw milk sanitation compliance rating whenever any of the raw milk sources is re-rated and a new FDA

2359i shall be submitted to the Food and Drug Administration Regional Office.

NOTE: The acceptance of milk which is rated less than 90 percent, is a violation of the agreed upon provisions of Option 1, and would initiate an immediate withdrawal of the shippers name from the Interstate Milk Shippers List.

In the case of a plant utilizing only one unattached supply, and that supply is rated less than 90, the sanitation compliance rating of the supply shall be shown on the 2359i, and no credit shall be given under Item 4, Part III, "Report of Enforcement Methods," FDA 2359j.

G. EXAMPLES OF RATING FORMS

The following pages contain examples of blank forms used in IMS ratings. These forms include:

1. FDA Form 2359j (Page 1) – Report of Milk Sanitation Rating
2. FDA Form 2359j (Page 2) – Report of Enforcement Methods
3. FDA Form 2359k - Status of Raw Milk for Pasteurization
4. FDA Form 2359L – Status of Milk Plants including Receiving Stations
5. FDA Form 2359L - Status of Condensed and Dry Milk Plants
6. FDA Form 2359i – Interstate Milk Shippers Report
7. Evaluation of Sampling Procedures

REPORT OF ENFORCEMENT METHODS

Shipper _____

Enforcement Rating _____

Date of Survey _____

DAIRY FARMS PART I							MILK PLANT PART II						INDIVIDUAL SHIPPER RATING PART III													
Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit	Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit	Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit			
1	3	All dairy farms hold valid permits				5		1	3	All milk plants receiving station and transfer station operators hold valid permits				5		1		Enter total credit from Part I under percent complying				45				
2	5	All dairy farms, etc., inspected at least once every 6 months or as required in Appendix "P"				15		2	5	Milk plant inspected at least once every 3 months, transfer station(s) once every 6 months				15		2		Enter total credit from Part II under percent complying				45	/90			
3	5	Inspection sheets posted or available				5		3	5	Inspection sheets posted or available				5		3	4	All milk and milk products properly labeled				4				
4	7	Requirements interpreted in accordance with PHS/FDA Milk Ordinance as indicated by past inspections				10		4	7	Requirements interpreted in accordance with PHS/FDA Milk Ordinance as indicated by past inspections				10		4	11	Provisions of Section 11 followed when milk and milk products are imported				6				
5	8	T B & Brucellosis Certification on file as required				10		5	7 App I	Pasteurization equipment tested at required frequency				15		INDIVIDUAL SHIPPER ENFORCEMENT RATINGS										
6	7	Water samples tested and reports on file as required				5		6	7	Individual and cooling water samples tested and reports on file as required				5		Individual Shipper of Raw Milk for Pasteurization:										
7	5	Milking time inspection program established				5		7	6	Samples of each plant's milk and milk products collected at required frequency and necessary laboratory examination made				10		Without receiving station or plant: Evaluate all items Part I and record. With receiving stations: Evaluate all items Part I. Evaluate all items Part II except items 5, 7, & 8. Divide by 65. Evaluate all items Part III.										
8	6	At least four samples collected from each dairy farm's supply every six months and necessary laboratory examinations made				10		8	6 App B	Sampling procedures approved by PHS/FDA evaluation methods				10		Individual Shipper of Pasteurized Milk and Milk Products:										
9	6 App B	Sampling procedures approved by PHS/FDA evaluation methods				10		9	3,5,6,16	Permit issuance, suspension, revocation, reinstatement, hearings, and/or court actions taken as required				15		With attached Raw Supply: Evaluate all items Part I. Evaluate all items Part II, use 45 weight. Evaluate all items Part III. With Unattached Raw Supplies: Evaluate all items Part II, use 90 weight. Evaluate all items Part III, except 1.										
10	3,5,6,16	Permit issuance, suspension, revocation, reinstatement, hearings, and/or court actions taken as required				15		10		Records systematically maintained and current				10		Remarks (Continued)										
11		Records systematically maintained and current				5		TOTAL CREDIT, Part II						Remarks (Continued)												
TOTAL CREDIT, Part I																										
Remarks																										

STATUS OF RAW MILK FOR PASTEURIZATION

Name of Shipper _____
 Date of Survey _____

Sanitation Compliance Rating¹ _____

Name of Dairy Farm	ITEMS OF SANITATION																												Remarks														
	Pounds Sold Daily (100# Units)	Abnormal Milk	Milking Barn Construction										Milkhouse Construction and Facilities					Water Supply	Utensils and Equipment				Milking	Drugs	Personnel		Insects and Rodents					Bacterial count or drug residue analysis	Total Debits ²	Pounds Sold Daily (100 # units) X Total Debits									
			Somatic Cell Count		Floors	Walls and Ceilings	Separate Stalls	Lighting	Ventilation	Cleanliness	Cowyard	Floors	Walls and Ceilings	Lighting and Ventilation	Misc. Requirements	Cleaning Facilities	Cleanliness		Toilet	Construction	Cleaning	Sanitization			Storage	Flanks, Udders and Teats	Protection from Contamination	Drugs, drug equip., cleaners/sanitizers, labeled, handled and stored		Labeled for use, stored safely	Hand Washing Facilities				Personnel Cleanliness	Cooling	Fly breeding minimized	Manure packs maintained	Milkhouse openings screened,	Doors tight, milkhouse free of insects	Approved pesticides used, equipment and	Utensils not exposed to contamination	Surroundings neat and clean
			1	2																																							
ITEM	5	5	1	1	1	1	1	3	3	1	1	2	2	2	4	4	2 or 5	4	5	5	2	5	3	2 - (7) - 5	2	1	5	3	2	2	2	10											
WEIGHT	5	5	1	1	1	1	1	3	3	1	1	2	2	2	4	4	2 or 5	4	5	5	2	5	3	2 - (7) - 5	2	1	5	3	2	2	2	10											
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18.																																											
19.																																											
20.																																											
Total or Subtotal																																											
% of Dairy Farms violating																																											

Department of Health and Human Services Public Health Service Food and Drug Administration	INTERSTATE MILK SHIPPERS REPORT <i>(Submit an original and two copies to the FDA Regional Office)</i>	INTERNAL USE ONLY <table border="1" style="width:100%; height: 20px; border-collapse: collapse;"> <tr> <td style="width:12.5%;"></td> </tr> </table>								

1. NAME OF SHIPPER	2. CITY	3. STATE
4. STREET	5. PLANT or BTU NO.	6. PRODUCT CODE #S.

7. SURVEY DATA

	DAIRY FARMS	RECEIVING OR TRANSFER STATIONS	PASTEURIZATION OR DRYING PLANT ¹	ENFORCEMENT						
	TYPE OF RATING AREA INDIVIDUAL									
RATING (%)										
DATE OF RATING										
TOTAL NUMBER				APPENDIX N						
NUMBER INSPECTED				IS THIS SHIPPER IN COMPLIANCE WITH THE PROVISIONS OF APPENDIX N?						
VOLUME RECEIVED DAILY (Cwt)				YES NO						
RATING AGENCY SHD SDA OTHER _____	CERTIFIED STATE RATING OFFICER	OFFICER'S CERTIFICATION EXPIRATION DATE		EARLIEST RATING DATE						
				<table border="1" style="width:100%; border-collapse: collapse; font-size: x-small;"> <tr> <th style="width:25%;">MONTH</th> <th style="width:25%;">DAY</th> <th style="width:25%;">YEAR</th> </tr> <tr> <td style="border: none;"></td> <td style="border: none;"></td> <td style="border: none;"></td> </tr> </table>	MONTH	DAY	YEAR			
MONTH	DAY	YEAR								

AGENCY PROVIDING CONTINUOUS SUPERVISION OF SUPPLY

8. LABORATORY CONTROL

APPROVED LABORATORY NUMBER	EXPIRATION DATE	PROCESSED MILK TESTS APPROVED					RAW MILK TESTS APPROVED		
A. _____ B. _____	A. _____ B. _____	SPC	COLI	PHOS	RBC	DRUG RESIDUE TESTS	VIABLE COUNTS	SOMATIC CELL COUNTS	DRUG RESIDUE TESTS
		A. ____ B. ____	A. ____ B. ____	A. ____ B. ____	A. ____ B. ____	A. ____ B. ____	A. ____ B. ____	A. ____ B. ____	A. ____ B. ____
DATE OF LAST TWO SPLIT SAMPLES A. _____ A. _____ B. _____ B. _____	APPROVED WATER LABORATORY AND DATE					WATER TESTS APPROVED			

9. PUBLICATION (Written permission from shipper must be filed at Regional office of FDA prior to publication of ratings)

LETTER OF PERMISSION TO PUBLISH IS TRANSMITTED WITH THIS REPORT? YES NO

10. SUBMISSION OF REPORT BY STATE AGENCY

DATE OF REPORT	SUBMITTED BY: (SIGNATURE AND TITLE)

FOR FDA REGIONAL OFFICE USE ONLY

Written permission from shipper dated _____ on file and publication of rating recommended.

Date	Signature (FDA Milk Specialist)
------	---------------------------------

¹Submit separate form for each pasteurization plant or drying plant.

EVALUATION OF SAMPLING PROCEDURES
 (For calculation of REPORT OF ENFORCEMENT METHODS, FDA 2359j
 Part I, Item 9 and Part II, Item 8)

Shipper _____ Inspecting Agency _____

Permit Number _____ Date (s) _____

Evaluation of Sampling Procedures

No.	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit
1	Sample Surveillance Officers Properly Certified					
2	Adequate Training Program					
3	Sample Surveillance Authority Properly Delegated					
4	All Samplers Hold Valid License or Permits					
5	Sampler Evaluations Each 2 Years and Reports Filed					
6	Sampling Procedures in Substantial Compliance					
7	Permit Suspension, etc., Taken as Required					
8	Records Systematically Maintained and Current					
	Total Credit					

Items 4 and 7 of this form are not applicable when calculating enforcement scores for Report of Enforcement Methods, Part II, Item 8.

Comments:

H. EXAMPLES FOR COMPUTING RATINGS

The following pages provide examples of forms that have been completed to demonstrate how observations would be recorded. These include:

1. Report of Milk Sanitation Rating (2359j)
2. Report of Enforcement Methods (Plant only) (2359j)
3. Evaluation of Sampling Procedures (Plant) (Part II, Item 8)
4. Report of Enforcement Methods (Receiving station and BTU) (2359j)
5. Evaluation of Sampling Procedures (Farms Only) (Part I, Item 9)
6. Report of Enforcement Methods (BTU – 2359j)
7. Evaluation of Sampling Procedures (Farms Only) (Part I, Item 9)
8. Status of Raw Milk for Pasteurization (2359k)
9. Status of Milk Plant (2359L)
10. Status of Condensed and Dry Milk Plant (2359L)
11. Status of Milk Plant (Plant and Receiving Stations) (2359L)
12. Interstate Milk Shippers Report (2359i)

REPORT OF MILK SANITATION RATING (2359j, Page 1)

Of A Brown Dairy

As of April 10, 2000

Shippers Name and Address			Date		
Regulatory Agency My State Department of Agriculture		Milk Sanitarian M.I. Good	Ordinance in Effect Edition 1997 Date Adopted: 9 April, 1999		
Surveyed by: (Name) (Title) (Agency) M.Milkramer, Milk Sanitation Rating Officer, State HD	Date Certified by PHS/FDA: 6-17-99	Survey based on : 1999 Edition PHS/FDA Pasteurized Milk Ordinance		Approved Laboratory (Name or #) #63540 Date: July 1999	

SUMMARY OF SURVEY RESULTS

Number of dairy farms	314	Sanitation compliance rating of raw milk for pasteurization	91
Number of dairy farms inspected	40	Sanitation compliance rating of milk plant	94
Number of milk plants	1		
Number of milk plants inspected	1	Enforcement Rating	92
Total pounds of pasteurized milk	1,628,000		

Recommendations of Milk Sanitation Rating Officer

The Sanitation compliance rating of the raw milk for pasteurization, the pasteurization plant and the enforcement rating are approximately the same as reported for the last rating. Although these scores meet the minimum requirements for participation in the IMS program, the observations made during this rating indicate the need to improve some areas of the milk sanitation program. These include:
1. Attention should be directed to the items of sanitation which were found in violation at 25% or more of the dairy farms, items #3,6,12 and 16.
2. In the milk plant, particular attention should be directed to the HTST pasteurization deficiencies, item 16p(B) 2.
3. The milk regulatory agency should adhere more closely to the minimum required frequency for inspecting milk tank trucks.
4. Written notices of intent to suspend should be issued when there are repeat violations.
Note: Two farm bulk milk storage tanks manufactured after January 1, 2000 are not equipped with acceptable recording devices.

REPORT OF ENFORCEMENT METHODS (Plant Only, 2359j, Page 2)

Shipper Clear Milk Plant
Date of Survey February 12, 2000

Enforcement Rating 89.7 = 90

DAIRY FARMS PART I						MILK PLANT PART II						INDIVIDUAL SHIPPER RATING PART III											
Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit	Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit	Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit
1	3	All dairy farmers hold valid permits				5		1	3	All milk plants receiving station and transfer station operators hold valid permits				5		1		Enter total credit from Part I under percent complying				45	N/A
2	5	All dairy farms, etc., inspected at least once every 6 months or as required in Appendix "P"				15		2	5	Milk plant inspected at least once every 3 months, transfer station(s) once every 6 months	8	8	100	15		2		Enter total credit from Part II under percent complying			89.4	45/90	80.5
3	5	Inspection sheets posted or available				5		3	5	Inspection sheets posted or available				5		3	4	All milk and milk products properly labeled	5	4	80	4	3.2
4	7	Requirements interpreted in accordance with PHS/FDA Milk Ordinance as indicated by past inspections				10		4	7	Requirements interpreted in accordance with PHS/FDA Milk Ordinance as indicated by past inspections	1	.8	80	8		4	11	Provisions of Section 11 followed when milk and milk products are imported				6	6
5	8	T B & Brucellosis certification on file as required				10		5	App I	Pasteurization equipment tested at required frequency	8	6	75	11.3	<p align="center">INDIVIDUAL SHIPPER ENFORCEMENT RATINGS</p> Individual Shipper of Raw Milk for Pasteurization: Without receiving station or plant: Evaluate all items Part I and record. With receiving stations: Evaluate all items Part I. Evaluate all items Part II except items 5, 7, & 8. Divide by 65. Evaluate all items Part III. Individual Shipper of Pasteurized Milk and Milk Products: With attached Raw Supply: Evaluate all items Part I. Evaluate all items Part II, use 45 weight. Evaluate all items Part III. With Unattached Raw Supplies: Evaluate all items Part II, use 90 weight. Evaluate all items Part III, except 1.								
6	7	Water samples tested and reports on file as required				5		6	7	Individual and cooling water samples tested and reports on file as required	8	6	75	3.8									
7	5	Milking time inspection program established				5		7	6	Samples of each plant's milk and milk products collected at required frequency and necessary laboratory examination made	5	4	80	8									
8	6	At least four samples collected from each dairy farm's milk supply every six months and necessary laboratory examinations made				10		8	App B	Sampling procedures approved by PHS/FDA evaluation methods	1	.93	93	9.3									
9	6 App B	Sampling procedures approved by PHS/FDA evaluation methods				10		9	3,5,6,16	Permit issuance, suspension, revocation, reinstatement, hearings, and/or court actions taken as required	1	1	100	15									
10	3,5,6,16	Permit issuance, suspension, revocation, reinstatement, hearings, and/or court actions taken as required				15		10		Records systematically maintained and current	1	9	90	9									
11		Records systematically maintained and current				10		TOTAL CREDIT, Part II						89.4	Remarks (Continued)								
TOTAL CREDIT, Part I						Remarks (Continued)						7. No annual vitamin samples for fat free milk.											
Remarks						4. Violations of 15 b.(c) and 16 b. (2) (d) existed but were not marked at last inspection.						8. See Evaluation of Sampling Procedures.											
						5. Two of 8 sets of pasteurizer tests were incomplete.						10. Laboratory records for yogurt not kept on ledgers Part III											
												3. "Grade A" only in yogurt ingredients statement.											
						6. Two water samples missing.																	

EVALUATION OF SAMPLING PROCEDURES (*Plant - Part II, Item 8*)
For calculation of REPORT OF ENFORCEMENT METHODS, FDA 2359j
Part I, Item 9 and Part II, Item 8)

Shipper Clear Milk Plant

Inspecting Agency My State Dept. of Health

1 Milk Road, My State, 11111

My State Capitol, My State, 22222

Permit Number 2233

Date (s) 12 February, 2000

No.	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit
1	Sample Surveillance Officers Properly Certified	2	2	100	5	5
2	Adequate Training Program	1	1	100	5	5
3	Sample Surveillance Authority Properly Delegated	2	2	100	10	10
4	All Samplers Hold Valid License or Permits	NA	NA	NA	10	NA
5	Sampler Evaluations Each 2 Years and Reports Filed	8	6	75	20	15
6	Sampling Procedures in Substantial Compliance	4	4	100	20	20
7	Permit Suspension, etc., Taken as Required	NA	NA	NA	20	NA
8	Records Systematically Maintained and Current	1	1	100	10	10
	Total Credit				100	65/70= .93

Items 4 and 7 of this form are not applicable when calculating enforcement scores for Report of Enforcement Methods, Part II, Item 8.

Comments: (5) One of two State regulatory officials who take samples at this plant and one of six milk plant receiving personnel who sample incoming tankers have not been evaluated in the last two years.

REPORT OF ENFORCEMENT METHODS (Rec. Sta. & BTU, 2359j, Page 2)

Shipper Clear Milk Coop Receiving Station

Enforcement Rating = 90.8 = 91

Date of Survey February 13, 2000

DAIRY FARMS PART I							MILK PLANT PART II						INDIVIDUAL SHIPPER RATING PART III											
Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit	Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit	Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit	
1	3	All dairy farms hold valid permits	25	25	100	5	5	1	3	All milk plants receiving station and transfer station operators hold valid permits				5	5	1		Enter total credit from Part I under percent complying			88.6	45	39.9	
2	5	All dairy farms, etc., inspected at least once every 6 months or as required in Appendix "P"	25	20	80	15	12	2	5	Milk plant inspected at least once every 3 months, transfer station(s) once every 6 months	8	6	75	15	11.3	2		Enter total credit from Part II under percent complying			90.9	45/90	40.9	
3	5	Inspection sheets posted or available	25	25	100	5	5	3	5	Inspection sheets posted or available				5	5	3	4	All milk and milk products properly labeled	1	1	100	4	4	
4	7	Requirements interpreted in accordance with PHS/FDA Milk Ordinance as indicated by past inspections	25	20	80	10	8	4	7	Requirements interpreted in accordance with PHS/FDA Milk Ordinance as indicated by past inspections	1	9	90	10	9	4	11	Provisions of Section 11 followed when milk and milk products are imported				6	6	
5	8	T B & Brucellosis certification on file as required				10	10	5	7 App I	Pasteurization equipment tested at required frequency	N/A	N/A	N/A	15	N/A	INDIVIDUAL SHIPPER ENFORCEMENT RATINGS								
6	7	Water samples tested and reports on file as required	25	25	100	5	5	6	7	Individual and cooling water samples tested and reports on file as required	8	6	75	5	3.8	Individual Shipper of Raw Milk for Pasteurization:								
7	5	Milking time inspection program established				5	5	7	6	Samples of each plant's milk and milk products collected at required frequency and necessary laboratory examination made	N/A	N/A	N/A	10	N/A	Without receiving station or plant: Evaluate all items Part I and record. With receiving stations: Evaluate all items Part I. Evaluate all items Part II except items 5, 7, & 8. Divide by 65. Evaluate all items Part III.								
8	6	At least four samples collected from each dairy farm's milk supply every six months and necessary laboratory examinations made	25	20	80	10	8	8	6 App B	Sampling procedures approved by PHS/FDA evaluation methods	N/A	N/A	N/A	10	N/A	Individual Shipper of Pasteurized Milk and Milk Products: With attached Raw Supply: Evaluate all items Part I. Evaluate all items Part II, use 45 weight. Evaluate all items Part III.								
9	6 App B	Sampling procedures approved by PHS/FDA evaluation methods	1	82	82	10	8.2	9	3,5,6,16	Permit issuance, suspension, revocation, reinstatement, hearings, and/or court actions taken as required	1	1	100	15	15	With Unattached Raw Supplies: Evaluate all items Part II, use 90 weight. Evaluate all items Part III, except 1.								
10	3,5,6,16	Permit issuance, suspension, revocation, reinstatement, hearings, and/or court actions taken as required	25	22	88	15	13.2	10		Records systematically maintained and current	1	1	100	10	10	Remarks (Continued)								
11		Records systematically maintained and current	25	23	92	10	9.2	TOTAL CREDIT, Part II						59.1										
TOTAL CREDIT, Part I							88.6						(59.1 ÷ 65X100 = 90.9)						Part II					
Remarks							8. Insufficient number of samples of 5 dairy farms.						2. Two inspection frequencies missed.											
2. Minimum inspection interval not met on 5 dairy farms.							9. SEE ATTACHED WORKSHEET.						4. Badly eroded floors not marked at last inspection.											
4. Violations existing during the last inspection not marked on 5 dairy farms last inspection sheets.							10. Regulatory action not properly taken at 3 dairy farms.						6. Recirculated cooling water sampling frequency was missed twice.											
11. Lab. Records not up to date for 2 dairy farms.																								

EVALUATION OF SAMPLING PROCEDURES (Farms Only, Part I, Item 9)
 (For calculation of REPRT OF ENFORCEMENT METHODS, FDA 2359j
 Part I, Item 9 and Part II, Item 8)

Shipper: Clear Milk Coop Receiving
 Station (Farms Only) _____

Inspecting Agency My State Dept. of Health

1 Milk Road, My State, 11111

My State Capitol, My State, 22222

Permit Number 1122

Date (s) 13 February, 2000

	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit
1	Sample Surveillance Officers Properly Certified	2	2	100	5	5
2	Adequate Training Program	1	1	100	5	5
3	Sample Surveillance Authority Properly Delegated	2	2	100	10	10
4	All Samplers Hold Valid License or Permits	12	8	67	10	6.7
5	Sampler Evaluations Each 2 Years and Reports Filed	12	6	50	20	10
6	Sampling Procedures in Substantial Compliance	4	3	75	20	15
7	Permit Suspension, etc., Taken as Required	12	12	100	20	20
8	Records Systematically Maintained and Current	1	1	100	10	10
	Total Credit				100	81.7= 82

Items 4 and 7 of this form are not applicable when calculating enforcement scores for Report of Enforcement Methods, Part II, Item 8.

Comments: (4) Three “weekend” haulers and one field person who takes somatic cell count reinstatement samples are not licensed. (5) In addition to the four individuals in #4, two licensed bulk milk haulers were not evaluated in the last 2 years. (6) One hauler was observed to take the milk temperature with a thermometer which had not been sanitized, sample the milk before the required agitation time had elapsed, fill the sample container over the open tank, and not take a temperature control sample at the first stop.

REPORT OF ENFORCEMENT METHODS (BTU, 2359j, Page 2)

Shipper Clear Milk Coop BTU #1

Enforcement Rating 89

Date of Survey February 13, 2000

DAIRY FARMS PART I						MILK PLANT PART II						INDIVIDUAL SHIPPER RATING PART III											
Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit	Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit	Number	Ordinance Section	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit
1	3	All milk dairy farms hold valid permits	20	20	100	5	5	1	3	All milk plants receiving station and transfer station operators hold valid permits				5		1		Enter total credit from Part I under percent complying				45	
2	5	All dairy farms, etc., inspected at least once every 6 months or as required in Appendix "P"	20	16	80	15	12	2	5	Milk plant inspected at least once every 3 months, transfer station(s) once every 6 months				15		2		Enter total credit from Part II under percent complying				45	/90
3	5	Inspection sheets posted or available	20	20	100	5	5	3	5	Inspection sheets posted or available				5		3	4	All milk and milk products properly labeled				4	
4	7	Requirements interpreted in accordance with PHS/FDA Milk Ordinance as indicated by past inspections	20	15	75	10	7.5	4	7	Requirements interpreted in accordance with PHS/FDA Milk Ordinance as indicated by past inspections				10		4	11	Provisions of Section 11 followed when milk and milk products are imported				6	
5	8	T B & Brucellosis certification on file as required				10	10	5	7 App I	Pasteurization equipment tested at required frequency				15		INDIVIDUAL SHIPPER ENFORCEMENT RATINGS							
6	7	Water samples tested and reports on file as required	20	17	85	5	4.25	6	7	Individual and cooling water samples tested and reports on file as required				5		Individual Shipper of Raw Milk for Pasteurization:							
7	5	Milking time inspection program established				5	5	7	6	Samples of each plant's milk and milk products collected at required frequency and necessary laboratory examination made				10		Without receiving station or plant: Evaluate all items Part I and record. With receiving stations: Evaluate all items Part I. Evaluate all items Part II except items 5, 7, & 8. Divide by 65.. Evaluate all items Part III.							
8	6	At least four samples collected from each dairy farm's milk supply every six months and necessary laboratory examinations made	20	18	90	10	9	8	6 App B	Sampling procedures approved by PHS/FDA evaluation methods				10		Individual Shipper of Pasteurized Milk and Milk Products:							
9	6 App B	Sampling procedures approved by PHS/FDA evaluation methods	1	.82	82	10	8.2	9	3,5, 6,16	Permit issuance, suspension, revocation, reinstatement, hearings, and/or court actions taken as required				15		With attached Raw Supply: Evaluate all items Part I. Evaluate all items Part II, use 45 weight. Evaluate all items Part III. With unattached Raw Supplies: Evaluate all items Part II, use 90 weight. Evaluate all items Part III, except 1.							
10	3,5, 6,16	Permit issuance, suspension, revocation, reinstatement, hearings, and/or court actions taken as required	20	18	90	15	13.5	10		Records systematically maintained and current				10		Remarks (Continued)							
11		Records systematically maintained and current	20	20	100	10	10	TOTAL CREDIT, Part II															
TOTAL CREDIT, Part I												Remarks (Continued)											
						89.45						4. Last inspection missed violations at 5 dairy farms.						10. Inadequate regulatory action at 2 dairy farms.					
Remarks												6. Outdated water samples at 3 dairy farms.											
2. Minimum inspection interval not met on 4												8. Insufficient samples from 2 dairy farms.											
of the 20 dairy farms evaluated.												9. SEE ATTACHED WORK SHEET.											

EVALUATION OF SAMPLING PROCEDURES (*Farms Only, Part I, Item 9*)
 (For calculation of REPORT OF ENFORCEMENT METHODS, FDA 2359j
 Part I, Item 9 and Part II, Item 8)

Shipper Clear Milk Coop BTU

Inspecting Agency My State Dept. of Health

1 Milk Road, My State, 11111

My State Capitol, My State, 22222

Permit Number 1122

Date (s) 13 February, 2000

No.	Item	Number Inspected	Number Complying	Percent Complying	Weight	Credit
1	Sample Surveillance Officers Properly Certified	2	2	100	5	5
2	Adequate Training Program	1	1	100	5	5
3	Sample Surveillance Authority Properly Delegated	2	2	100	10	10
4	All Samplers Hold Valid License or Permits	12	8	67	10	6.7
5	Sampler Evaluations each 2 Years and Reports Filed	12	6	50	20	10
6	Sampling Procedures in substantial Compliance	4	3	75	20	15
7	Permit Suspension, etc., Taken as Required	12	12	100	20	20
8	Records Systematically Maintained and Current	1	1	100	10	10
	Total Credit				100	81.7= 82

Items 4 and 7 of this form are not applicable when calculating enforcement scores for Report of Enforcement Methods, Part II, Item 8.

Comments: (4) Three "weekend" haulers and one field person who takes somatic cell count reinstatement samples are not licensed. (5) In addition to the four individuals in #4, two licensed bulk milk haulers were not evaluated in the last 2 years. (6) One hauler was observed to take the milk temperature with a thermometer which had not been sanitized, sample the milk before the required agitation time had elapsed, fill the sample container over the open tank, and not take a temperature control sample at the first stop.

STATUS OF RAW MILK FOR PASTEURIZATION (2359k)

Name of Shipper Great Cows BTU

Date of Survey 10 January, 2000

Sanitation Compliance Rating¹ 91

Name of Dairy Farm	Pounds Sold Daily (100# Units)	ITEMS OF SANITATION																												Total Debits ²	Pounds Sold Daily (100 # units) X Total Debits	Remarks														
		Abnormal Milk	Somatic Cell Count	Milking Barn Construction							Cowyard	Milkhouse Construction and Facilities					Toilet	Water Supply	Utensils and Equipment				Milking	Drugs	Personnel	Insects and Rodents							Bacterial count or drug residue analysis													
				Floors	Walls and Ceilings	2			Lighting	Ventilation		Cleanliness	Floors	Walls and Ceilings	Lighting and Ventilation	Misc. Requirements			Cleaning Facilities	Cleanliness	Construction	Cleaning				Sanitization	Storage	Flanks, Udders and Teats	Protection from Contamination					Drugs, drug equip., cleaners/sanitizers, labeled, handled and stored	Labeled for use, stored safely	Hand Washing Facilities	Personnel Cleanliness	Cooling	Fly breeding minimized	Manure packs maintained	Milkhouse openings screened,	Doors tight, milkhouse free of insects	Approved pesticides used, equipment and utensils not exposed to contamination	Surroundings neat and clean		
						1	A	B																																					C	D
WEIGHT	5	5	1	1	1	1	1	3	3	1	1	2	2	2	4	4	2 or 5	4	5	5	2	5	3	2 - (7) - 5	2	1	5	3	2	2	2	2	10													
1. Roy Harris	17			1														5																9	153	Major Water Violation										
2. James Henley	21			1																														4	84											
3. W. T. Miller	5		5																																10	34	170	Insufficient Milk Samples								
4. John Barkley	11																																			11	121	Only cold water to hand sink								
5. K. R. Olson	15																																				7	105	Minor water violation							
6. Robert Taylor	10		5																																		5	50	2 of 4 sscw w/last 1 violative							
7. Pete Carhart	18				1																																	12	216							
8. Davis & Nelson	33																																					7	231							
9. Al Hart	10																																						7	70						
10. Don Meyers	8																																							12	96					
11. Wm. Long	12				1																																				10	120	3r - feed storage			
12. Jon Jones	27					1																																			12	324	Drugs w/o directions			
13. John Marshall	16																																									15	240	Drug storage and pig meds		
14. R. W. Ripple	12				1																																					3	36			
15. N. W. Williams	23	5																																								9	207	Dirty abnormal equip barn		
16. R. A. Wolf	19	5					1																																			6	114	Dirty abnormal equip milk house		
17. Frank Ecker	11																																										7	77		
18. Henry Ronan	13																																											12	156	Inflations stored in parlor open to business
Total or Subtotal	281	2	2	1	3	1	1	1	7	3	--	2	1	2	--	4	--	3	2	1	1	3	5	1	4	2	1	1	1	1	--	--	1	1	1	1	182	2570								
% of Dairy Farms Violating																																														

**STATUS OF MILK PLANTS (2359L)
INCLUDING RECEIVING STATIONS**

Milk Plant I.M.A. Dairy

Date of Survey 3/20, 2000

Sanitation Compliance Rating¹ 90

NAME OF PLANT	Pounds Processed daily (100# Units)	ITEMS OF SANITATION																										Total Debits ²	Pounds Processed Daily (100# units) X Total Debits ³	REMARKS						
		Floors	Walls and Ceiling	Doors and Windows	Lighting	Ventilation	Separate Rooms	Toilet-Sewage Disposal Facilities	Water Supply	Hand Washing Facilities	Milk Plant Cleanliness	Sanitary Piping	Containers and Equipment				Protection from Contamination	Pasteurization					Bottling Capping		Personnel Cleanliness	Vehicles	Surroundings				Bacterial Count*	Coliform Count*				
													Construction and Repair	Cleaning	Sanitization	Storage of Clean Equipment		Storage of Single Service Articles	Indicating and Recording Therms.	Time and Temperature Controls	Adulteration Controls	Regeneration Heating	Temperature Recording Charts	Cooling									Bottling and Packaging	Capping		
Item	1	2	3	4a	4b	5	6	7	8	9	10	11	12ab	12c-f	13	14	15a	15b	16abc (1)	16abc (2)	16b-c	16d	16e	17	18	19	20	21	22							
Weight	1	1	2	1	1	3	3	4	2	3	3	3	5	5	3	2	3	5	4	15	3	10	4	5	5	1	1	2	5*	10*						
I.M.A. Dairy	5,000					3											3																6	30,000		
Buttermilk Vat #1 (15)																				15													15	225	Inlet valve not removed from vat during holding	
C. Cheese Starter vat (3)																							4										4	12	Air Space reading not made at BOTH beginning and end of holding period.	
By Products HTST (360)																				15		10											25	9,000	Plant operating computer can start booster pump in divert mode	
1% Milk (500)																								5								5	10	20	10,000	Insufficient # of samples taken in the last 6 months
Tub Container (70)																										5							5	350	Hand lidding of 2 lb. containers	
Sour Cream (5)																																	10	10	50	2 of last 4 Coliform counts high (last test violative)
Totals	5,000																																	49,637		

Form FDA 2359L

1 Sanitation Compliance Rating = $\frac{\text{Total pounds processed daily} \times \text{Total Debits}}{\text{Total pounds processed daily}}$ Rating = $100 - \frac{49,637}{5,000} = 90.1$ 90

2 Total debits for each pasteurization plant is the sum of the weights of the items violated.

3 Total pounds processed daily are calculated in 100# units.

* Used only when not in compliance. Prorated by product. (Note – If any ITEM or part of an ITEM is violated, indicate by the debit value (weight) under that ITEM.

STATUS OF CONDENSED AND DRY MILK PLANTS (2359L)

Milk Plant G.M.I. Good Dairy

Date of Survey 2/20/2000

Sanitation Compliance Rating¹ 91

NAME OF PLANT	Pounds Processed Daily (100# Units)	ITEMS OF SANITATION																				Total Debits ²	Pounds Processed Daily ³ (100# units) X Total Debits	REMARKS												
		Floors	Walls and Ceiling	Doors and Windows	Lighting	Ventilation	Separate Rooms	Toilet-Sewage Disposal Facilities	Water Supply	Hand Washing Facilities	Milk Plant Cleanliness	Sanitary Piping	Containers and Equipment				Protection from Contamination				Pasteurization				Packing		Personnel		Vehicles	Surroundings	Bacterial Count*	Coliform Count*				
		1	2	3	4a	4b	5	6	7	8	9	10	11	12ab	12c-f	13	14	15a	15b	16a (1)	16a (2)				16b	16c	17	18	19	20	21	22	5*	10*		
	Item	1	2	3	4a	4b	5	6	7	8	9	10	11	12ab	12c-f	13	14	15a	15b	16a	16a	16b	16c	17	18	19	20	21	22	5*	10*					
	Weight	1	1	2	1	1	3	3	4	2	3	3	3	5	5	3	2	3	5	4	15	10	4	5	3	3	1	1	2	2	5*	10*				
G.M.I. Good	1000																3	5															8	8 000		
Whey HTST																						4											4	800	Event pen not working	
Cond. Milk																														5	5	375		2 of the last 4 SPC tests high (last 1 violative.)		
	1000																																		9175	

Form FDA 2359L

1 Sanitation Compliance Rating = 100 - $\frac{\text{Total pounds processed daily} \times \text{Total Debits}}{\text{Total pounds processed daily}}$

Rating = 100 - $\frac{9175}{1000}$ = 90.8 = 91

2 Total debits for each pasteurization plant is the sum of the weights of the items violated.

3 Total pounds processed daily are calculated in 100# units.

* Used only when not in compliance. Prorated by product. (Note – If any ITEM or part of an ITEM is violated, indicate by the debit value (weight) under that ITEM.

**STATUS OF MILK PLANTS (Plant & Rec. Sta., 2359L)
INCLUDING RECEIVING STATIONS**

Milk Plant Metro Dairy Co.

Date of Survey 1/31/00

Sanitation Compliance Rating¹ 91

NAME OF PLANT	Pounds Processed daily (100# Units)	ITEMS OF SANITATION																							Total Debits ²	Pounds Processed Daily (100# units) X Total Debits ³								
		Floors	Walls and Ceiling	Doors and Windows	Lighting	Ventilation	Separate Rooms	Toilet-Sewage Disposal Facilities	Water Supply	Hand Washing Facilities	Milk Plant Cleanliness	Sanitary Piping	Containers and Equipment				Storage of Service Articles	Protected from Contamination	Pasteurization									Bottling Capping		Personnel Cleanliness	Vehicles	Surroundings	Bacterial Count*	Coliform Count*
													Construction and Repair	Cleaning	Sanitation	Storage of Clean Equipment			Indicating and Recording Thermometers	Time and Temperature Controls	Adulteration Controls	Regeneration Heating	Temperature Recording Charts	Cooling				Bottling and Packaging	Capping					
Item	1	2	3	4a	4b	5	6	7	8	9	10	11	12ab	12c-f	13	14	15a	15b	16abc (1)	16abc (2)	16b-c	16d	16e	17	18	19	20	21	22	5*	10*			
Weight	1	1	2	1	1	3	3	4	2	3	3	3	5	5	3	2	3	5	4	15	3	10	4	5			1	1	2					
Metro Dairy Co.	1000											3																				8	8,000	100 - 8 = 92
Metro Receiving Station (680)		1									3													5								9		Above 90, not completed
White Milk Receiving Station (220)		1	1	2	1						3															1	1					11		100 - 11 = 99, (Below 90)
																																		Subtract receiving station score.
																																		From plant score).
																																		92 - 89 = 3 X 220 = 660

1 Sanitation Compliance Rating = $100 - \frac{\text{Total pounds processed daily} \times \text{Total Debits}}{\text{Total pounds processed daily}}$

Sanitation Rating = $100 - \frac{8660}{1000} = 91.4 = 91$

2 Total debits for each pasteurization plant is the sum of the weights of the items violated.

3 Total pounds processed daily are calculated in 100# units.

* Used only when not in compliance. Prorated by product. (Note - If any ITEM or part of an ITEM is violated, indicate by the debit value (weight) under that ITEM)

Department of Health and Human Services Public Health Service Food and Drug Administration	INTERSTATE MILK SHIPPERS REPORT <i>(2359I)</i> <hr/> <i>(Submit an original and two copies to the FDA Regional Office)</i>	INTERNAL USE ONLY <table border="1" style="width:100%; height: 40px; border-collapse: collapse;"> <tr> <td style="width:12.5%;"></td> </tr> </table>								

1. NAME OF SHIPPER Clean Milk Dairy	2. CITY Every Town	3. STATE Mv State 22112															
4. STREET 2525 Milky Way	5. PLANT or BTU NO. <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">5</td> <td style="width:10%;">2</td> <td style="width:10%;">0</td> <td style="width:10%;">1</td> <td style="width:10%;">5</td> </tr> </table>	5	2	0	1	5	6. PRODUCT CODE #S. <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">1</td> <td style="width:10%;">2</td> <td style="width:10%;">4</td> <td style="width:10%;">5</td> <td style="width:10%;">7</td> <td style="width:10%;">9</td> <td style="width:10%;">10</td> <td style="width:10%;">18</td> <td style="width:10%;">19</td> <td style="width:10%;">20</td> </tr> </table>	1	2	4	5	7	9	10	18	19	20
5	2	0	1	5													
1	2	4	5	7	9	10	18	19	20								

7. SURVEY DATA										
	DAIRY FARMS	RECEIVING OR TRANSFER STATIONS	PASTEURIZATION OR DRYING PLANT ¹	ENFORCEMENT						
	TYPE OF RATING AREA INDIVIDUAL									
RATING (%)	92	NA	91	90						
DATE OF RATING	04/07/2000	NA	04/03/2000	04/07/2000						
TOTAL NUMBER	120	NA	1	APPENDIX N IS THIS SHIPPER IN COMPLIANCE WITH THE PROVISIONS OF APPENDIX N? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO						
NUMBER INSPECTED	34	NA	1							
VOLUME RECEIVED DAILY (Cwt)	NA	NA	98,000							
RATING AGENCY <input checked="" type="checkbox"/> SHD <input type="checkbox"/> SDA <input type="checkbox"/> OTHER _____	CERTIFIED STATE RATING OFFICER Mary Milkramer	OFFICER'S CERTIFICATION EXPIRATION DATE 19 Sept 2001		EARLIEST RATING DATE <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th style="width:15%;">MONTH</th> <th style="width:15%;">DAY</th> <th style="width:15%;">YEAR</th> </tr> <tr> <td style="text-align: center;">0</td> <td style="text-align: center;">4</td> <td style="text-align: center;">0 3 0 0</td> </tr> </table>	MONTH	DAY	YEAR	0	4	0 3 0 0
MONTH	DAY	YEAR								
0	4	0 3 0 0								

AGENCY PROVIDING CONTINUOUS SUPERVISION OF SUPPLY
My State Department of Agriculture

8. LABORATORY CONTROL									
APPROVED LABORATORY NUMBER	EXPIRATION DATE	PROCESSED MILK TESTS APPROVED					RAW MILK TESTS APPROVED		
A. <u>52001</u> B. <u>52302</u>	A. <u>02/01</u> B. <u>09/00</u>	SPC	COLI	PHOS	RBC	DRUG RESIDUE TESTS	VIABLE COUNTS	SOMATIC CELL COUNTS	DRUG RESIDUE TESTS
		A. <u>2</u> B. _____	A. <u>21</u> B. _____	A. <u>22</u> B. _____	A. <u>22</u> B. _____	A. <u>9B2&9D3</u> B. _____	A. <u>2</u> B. <u>3</u>	A. <u>12</u> B. <u>16</u>	A. <u>9B2&9D3</u> B. _____
DATE OF LAST TWO SPLIT SAMPLES A. <u>09/99</u> A. <u>02/01</u> B. <u>04/99</u> B. <u>09/00</u>		APPROVED WATER LABORATORY AND DATE State Health Dept Lab (State EPA 09/99)					WATER TESTS APPROVED MPN		

9. PUBLICATION *(Written permission from shipper must be filed at Regional office of FDA prior to publication of ratings)*

LETTER OF PERMISSION TO PUBLISH IS TRANSMITTED WITH THIS REPORT? YES NO

10. SUBMISSION OF REPORT BY STATE AGENCY

DATE OF REPORT 04/11/00	SUBMITTED BY: <i>(SIGNATURE AND TITLE)</i> Mary Milkramer /ss Milk Sanitation Rating Officer
-----------------------------------	--

FOR FDA REGIONAL OFFICE USE ONLY

Written permission from shipper dated _____ on file and publication of rating recommended.

Date	Signature <i>(FDA Milk Specialist)</i>
------	--

¹ Submit separate form for each pasteurization plant or drying plant.

Number of Dairies or Plants in Sample

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	50		
100	50	33	25	20	17	14	13	11	10	9	8	8	7	7	6	6	6	5	5	5	5	5	5	4	4	4	4	3	3	3	3	3	3	3	3	3	3	3	3	2	2	2	2	2	1	
	100	67	50	40	33	29	25	22	20	18	17	15	14	13	13	12	11	11	10	10	9	9	8	8	8	7	7	7	7	6	6	6	6	5	5	5	5	5	5	5	5	5	4	2		
		100	75	60	50	43	38	33	30	27	25	23	21	20	19	18	17	16	15	14	14	13	13	12	12	11	11	10	10	10	9	9	9	8	8	8	8	8	8	7	7	7	7	6	3	
			100	80	67	57	50	44	40	36	33	31	29	27	25	24	22	21	20	19	16	17	17	16	15	15	14	14	13	13	13	12	12	11	11	11	11	10	10	10	10	9	9	8	4	
				100	83	72	63	56	50	45	42	38	36	33	31	29	28	26	25	24	23	22	21	19	19	18	17	17	16	16	15	15	14	14	14	13	13	13	12	12	12	12	11	10	5	
					100	86	75	67	60	55	50	46	43	40	38	35	33	32	30	29	27	26	25	24	23	22	21	21	20	19	19	18	18	17	17	16	16	15	15	15	14	14	14	12	6	
						100	88	78	70	64	58	54	50	47	44	41	39	37	35	33	32	30	29	28	27	26	25	24	23	22	21	21	20	20	19	19	18	18	18	17	17	16	16	14	7	
							100	89	80	73	67	62	57	53	50	47	44	42	40	38	36	35	33	32	31	30	29	28	27	26	25	24	24	23	22	22	21	21	20	20	19	19	18	16	8	
								100	90	82	75	69	64	60	56	53	50	47	45	43	41	39	38	36	35	33	32	31	30	29	28	27	26	26	25	24	23	23	22	22	21	21	20	18	9	
									100	91	83	77	72	67	63	59	56	53	50	48	46	44	42	40	38	37	36	35	33	32	31	30	29	29	28	27	26	25	25	24	24	23	23	20	10	
										100	92	85	79	74	69	65	61	58	55	52	50	48	46	44	42	41	39	38	37	36	34	33	32	31	31	30	29	28	28	27	26	26	25	22	11	
											100	92	86	80	75	71	67	63	60	57	55	52	50	48	46	45	43	41	40	39	38	36	35	34	33	32	32	31	30	29	29	28	27	24	12	
												100	93	87	81	77	72	69	65	62	59	57	54	52	50	48	46	45	43	42	41	39	38	37	35	35	36	33	33	32	31	30	30	26	13	
													100	93	88	82	78	74	70	67	64	61	58	56	54	52	50	48	47	44	44	42	41	40	39	38	37	36	35	34	33	33	32	28	14	
														100	94	88	83	79	75	72	68	65	63	60	58	56	54	52	50	48	47	45	44	43	42	43	40	39	38	37	36	35	34	30	15	
															100	94	90	85	80	76	73	70	67	64	62	59	57	55	53	52	50	49	47	46	44	43	42	41	40	39	38	37	36	32	16	
																100	94	90	85	81	77	74	71	68	65	63	61	59	57	55	53	52	50	49	47	46	45	44	43	42	41	40	39	34	17	
																	100	94	90	86	82	78	75	72	69	67	64	62	60	58	56	55	53	51	50	49	47	46	45	44	43	42	41	36	18	
																		100	95	90	87	83	79	76	73	70	68	66	63	61	59	58	56	54	53	51	50	49	48	46	45	44	43	38	19	
																			100	95	91	87	83	80	77	74	71	69	66	65	63	61	59	57	56	54	53	51	50	49	48	40	20			
																				100	96	91	88	84	81	78	75	72	70	68	66	64	62	60	58	57	55	54	53	51	50	49	48	42	21	
																					100	96	92	88	85	82	79	76	73	71	69	68	65	63	61	60	58	57	55	54	52	51	50	44	22	
																						100	96	92	89	85	82	79	77	74	72	70	68	66	64	62	61	59	58	56	55	54	52	46	23	
																							100	96	92	89	86	83	80	77	75	73	71	69	67	65	63	62	60	59	57	56	54	48	24	
																								100	96	93	89	86	83	81	78	76	74	72	70	68	66	64	63	61	60	58	57	50	25	
																									100	96	93	90	87	84	81	79	77	74	72	70	68	67	65	63	62	61	59	52	26	
																										100	96	93	90	87	84	82	79	77	75	73	71	69	68	66	65	63	61	54	27	
																											100	97	93	90	87	85	82	80	78	76	74	72	70	68	67	65	64	64	56	28
																												100	97	94	91	88	85	83	81	78	76	74	73	71	69	67	66	66	58	29
																													100	97	94	91	88	86	83	81	79	77	75	73	71	70	68	60	30	
																														100	97	94	91	89	86	84	82	80	78	76	74	72	71	62	31	
																															100	97	94	92	89	87	84	82	80	78	76	74	73	64	32	
																																100	97	94	92	89	87	85	83	81	79	77	75	66	33	
																																	100	97	94	92	90	87	85	83	81	79	77	68	34	
																																		100	97	95	92	90	88	85	83	81	80	70	35	
																																			100	97	95	92	90	88	86	84	82	72	36	
																																				100	97	95	93	90	88	86	84	74	37	
																																					100	97	95	93	91	88	86	76	38	
																																						100	98	95	93	91	78	39		
																																							100	98	95	91	80	40		
																																							100	98	95	93	82	41		
																																							100	98	96	84	42			
																																							100	98	86	43				
																																							100	88	44					
																																							100	88	44					
																																								100	50					

Number of Plants or Dairies Violating an Item

Example: An item violated 16 times in survey of 25 dairy farms equals 64% violation.

APPENDIX A. GUIDELINES FOR COMPUTING ENFORCEMENT RATINGS

PART I. DAIRY FARMS

NOTE: Enforcement evaluation is based on NCIMS requirements, not on individual state's laws or regulations.

1. All dairy farms hold valid permits (Section 3 - Permits). (Prorated by number of producers in compliance.)
 - a. Every dairy farmer, in compliance, holds a valid permit.
 - b. Permits not transferable with respect to person and/or location.
2. All dairy farms inspected at least once every six (6) months or as required under Appendix P (Section 5 - Inspection of Dairy Farms). (Prorated by number of farms in compliance.)
 - a. Inspected prior to the issuance of a permit.
 - b. Every dairy farm inspected at least every six-(6) months or as required by Appendix P.
3. Inspection sheets posted or available (Section 5 - Inspection of Dairy Farms). (Prorated by number of farms in compliance.)

Copy of most recent inspection report shall be available at the dairy farm.
4. Requirements interpreted in accordance with PHS/FDA Milk Ordinance as indicated by past inspections (Section 7 - Standards for Milk and Milk Products). (Prorated by number of farms in compliance.)
 - a. Sanitarian's criterion is neither too lenient nor too stringent.
 - b. Significant violations, including construction, debited by the sanitarian on previous inspection.
 - c. Recognize violations and debit as appropriate on the previous inspection report.
5. Tuberculosis and Brucellosis Certification on file as required (Section 8 - Animal Health and Appendix A - Animal Disease Control). (All or nothing based on record verification.)
 - a. Located in a Certified Brucellosis--Free Area or Modified Accredited Tuberculosis Area as determined by USDA. (Other areas or herds must have passed an annual tuberculosis test;) or...
 1. Meet USDA requirements for individually certified herd; or...
 2. Participate in an approved milk ring test program; or...
 3. Individual blood agglutination test annually.
 - b. Tuberculosis or Brucellosis certificates on file as required by the regulatory authority.

- c. Notice of status changes readily available to the regulatory agency.
 - d. Milk from Brucellosis reactor animal withheld as required.
6. Water samples tested and reports on file as required (Section 7 - Standards for Milk and Milk Products and Appendix G - Chemical and Bacteriological Tests). (Prorated by number of farms in compliance.) (A farm missing one water sample during a required time period will receive no credit for this item.)
- a. Samples of private water supplies and recirculated cooling water systems taken upon initial construction/installation; and within 30 days after extensive repairs or alterations (use the Methods, pages 4 & 7 as a guide, e.g., include the elapsed period of the month in which the rating is made in addition to the specified time interval.)
 - b. Private water supplies sampled every three-(3) years.
 - c. Hauled water (cisterns) sampled in at least 4 months out of six at the point of use.
 - d. Recirculated water sampled every six-(6) months.
 - e. Water supplies with buried well seals sampled every six-(6) months.
 - f. No sampling required for public, community, or rural water system(s), which are under EPA/State Water Control Authority and in compliance with their requirements.
- g. Appropriate follow-up and re-sampling of the supply/system following a positive bacteriological result. (Within thirty [30] days.)
 - h. Heterotrophic count performed when required by Appendix G of the PMO.
 - i. Samples submitted to a laboratory acceptable to the regulatory agency.
 - j. Record of sample results on file at the regulatory agency back to the last rating (minimum of 12 months).
7. Milking time inspection program established (Section 5 - Inspection of Dairy Farms and Section 6 - Examination of Milk and Milk Products). (All or nothing item.)
8. At least four samples collected from each dairy farm's milk supply every six months and necessary laboratory examinations made (Section 6 - Examination of Milk and Milk Products). (Prorated by number of producers in compliance.)
- a. Four samples taken from each producer during any consecutive six-(6) month period (use the Methods, pages 4 & 7 as a guide).
 - b. Required bacterial, somatic cell counts, drug residue and cooling temperature checks performed on

each sample in an official or officially designated laboratory.

9. Sampling procedures approved by PHS/FDA evaluation methods (Section 6 - Examination of Milk and Milk Products, Evaluation of Milk Laboratories, and Standard Methods for the Examination of Dairy Products).

See Part IV, Guidance for Computing Enforcement Credit for Part I, Item 9 and Part II, Item 8.

10. Permit issuance, suspension, revocation, reinstatement, hearings and/or court action taken as required (Section 3 - Permits, Section 5 - Inspection of Dairy Farms, Section 6 - Examination of Milk and Milk Products and Section 16 - Penalty). (Prorated by number of producers in compliance.)

SANITATION REQUIREMENTS

- a. Permit issuance based on compliance.
- b. Notice issued for intent to suspend permit if inspection(s) disclose(s) a violation of an ordinance requirement(s). Reinspection(s) made as required.
- c. Permit suspended upon repeated violation(s).
- d. Action to revoke a permit taken upon multiple suspensions.
- e. Hearings provided for as required.

f. Reinstatement procedures followed.

- g. Milk produced during suspension for repeated inspection violations is not eligible for sale as Grade "A".

PRODUCT COMPLIANCE

- a. All milk produced during suspension for bacterial, somatic cell, cooling temperature or drug residue violations is not eligible for sale as Grade "A".
- b. When 2 out of the last 4 samples exceed the limits, written notice sent, additional sample taken within 21 days of date or notice, but not before 3 days.
- c. Permit suspension upon violation of:
 - (1) Section 3 for serious health hazard; or
 - (2) Section 5 for consecutive violation(s) of the same requirement of Section 7; or
 - (3) Section 6 for:
 - 3 out of last 5 samples exceed bacterial, cooling temperature, or somatic cell limits; or
 - a "4 in 6 month" positive antibiotic (not of Appendix N origin); or

- if pesticide contaminated milk is not withheld from sale.
- d. (Temporary) permit issued as required on reinstatement(s) and reinspection made within one week after proper notification (except after reinstatement for a drug residue or with sampling for somatic cell standard).
 - e. “Reinstating sample(s)” taken not more than 2 per week on separate days within a 3-week period (except for drug residues).
11. Records systematically maintained and current (Section 3 - Permits, Section 5 - Inspection of Dairy Farms, Section 6 - Examination of Milk and Milk Products, and Section 7 - Standards for Milk and Milk Products). (Make use of both general record-keeping deficiencies and record keeping by farm to determine value.)
- a. Permit records available, accurate and current including permit suspension, notices, reinstatement, etc.
 - b. Record of inspection on file at regulatory agency for the last rating (at least 12 months).
 - c. Bacterial counts, somatic cell counts, cooling temperatures, drug residues and/or pesticide results, and water analysis results promptly recorded on a milk ledger form or a computer program for each individual

dairy farm. (Use arithmetic average for bacterial counts and cooling temperature determinations when samples are collected from the same farm on the same day from multiple storage tanks.)

- d. Within the rating period: plan review file in order and written approval given for construction during the rating period.

PART II. MILK PLANT

NOTE: Enforcement evaluation is based on NCIMS requirements, not on individual state’s laws or regulations.

1. All milk plant, receiving station, and transfer station operators hold valid permits (Section 3 - Permits). (All or nothing item.)
 - a. All milk plants, receiving and transfer stations hold a valid permit.
 - b. Permits issued and retained only by those in compliance with the NCIMS requirements.
 - c. Permits not transferred with respect to persons and/or locations.
2. Milk plants and receiving stations inspected at least once every three (3) months [transfer stations once every six (6) months] (Section 5 - Inspection of Milk Plants). (Prorated by number of inspections in compliance.)

$$= \frac{\text{\# of 3 or 6 month periods with inspections}}{\text{total \# of 3 or 6 month periods in survey period}}$$

- a. Milk plants and receiving stations inspected at least once every 3 months
- b. Each transfer station inspected at least once every 6 months

- 3. Inspection sheets posted or available (Section 5 - Inspection of Milk Plants). (All or nothing item.)

One copy of the last inspection report shall be available at the milk plant, receiving station or transfer station.

- 4. Requirements interpreted in accordance with PHS/FDA Milk Ordinance as indicated by past inspections (Section 7[p] - Standards for Milk and Milk Products.) (Prorate by number of significant violation(s) not noted on the previous inspection.)

- a. Sanitarian's criteria is neither too lenient nor too stringent.
- b. Significant violations, including construction, debited by the sanitarian on previous inspection.
- c. Recognize violations and debit as appropriate on the previous inspection report.

- 5. Pasteurization equipment tested at required frequency (Section 7 - Standards for Milk and Milk Products and Appendix I - Pasteurization Equipment and Controls-Tests). (Prorated by number of units per

quarter that were correctly tested within the required testing frequency vs. total number of units.)

- a. Total required tests performed based on pasteurization system(s) (# of Vat Past. + # of HTST Past. + # of HHST Past. + # of Aseptic Systems) at milk plant.

$$= \frac{\text{\# of 3 month periods X \# of pasteurizers properly checked within each period*}}{\text{\# of 3 month periods X Total \# of pasteurizers}}$$

*Note: No credit for a period is given for a pasteurization unit unless all required tests for that unit have been correctly completed.

- b. Test performed at required frequency, including semi-annually, quarterly and daily tests by operator.
- c. All tests made and properly recorded (required calculations available).

- 6. Individual and cooling water samples tested and reports on file as required (Section 7[p] - Standards for Milk and Milk Products, Appendix D - Standards for Water Sources, and Appendix G - Chemical and Bacteriological Tests). (Prorated by number of water samples tested during the required time period vs. the total number of water tests due per water system.)

- a. Total required water tests performed based on each water system requiring testing at the

- plant, receiving or transfer station.
- =
$$\frac{\text{\# of test(s) performed at required frequency per water system X number of water systems}}{\text{\# of test(s) due at required frequency per water system X number of water systems}}$$
- b. Samples of private water supplies and recirculated cooling water (including sweet water and glycol systems) taken upon initial construction/installation; and within 30 days after extensive repairs or alterations and every 6 months thereafter.
 - c. No sampling required for public, community, or rural water system(s), which are under EPA/State Water Control Authority and in compliance with their requirements.
 - d. Condensing water for milk evaporators and water reclaimed from milk or milk products complying with Appendix D requirements.
 - e. Hauled water (cisterns) sampled 4 out of 6 months, at the point of use.
 - f. Water supplies with buried well seals sampled every six-(6) months.
 - g. Appropriate follow-up and re-sampling of the supply/system following a positive bacteriological result (Within thirty [30] days.)
 - h. Heterotrophic count performed when required by Appendix G of the PMO.
 - i. Samples submitted to a laboratory acceptable to the regulatory agency.
 - j. Record of sample results on file at the regulatory agency back to the last rating (minimum of 12 months).
7. Samples of each milk plant's milk and milk products collected at required frequency, and necessary laboratory examinations made (Section 6 - Examination of Milk and Milk Products and Section 6 of the DMO). (Prorated by number of products in compliance.)
 - a. During any consecutive 6 months, at least 4 samples of raw milk, after receipt by the plant, shall be collected, prior to pasteurization, in 4 separate months except when three months show a month containing two sampling dates separated by at least 20 days.
 - b. During any consecutive 6 months, at least 4 samples of each milk product processed (as defined in Sections 1 & 6) shall be collected in 4 separate months except when three months show a month containing two sampling dates separated by at least 20 days..
 - c. During any consecutive 6 months, at least 4 samples of heat-treated products shall be collected in at least 4 separate

months except when three months show a month containing two sampling dates separated by at least 20 days.

- d. Condensed and dry milk and whey products must be sampled monthly. However, if the production is not on a yearly basis, at least 5 samples shall be taken within a continuous production period.
 - e. All required examinations made on each sample (bacterial, Coliform, drug residue, phosphatase, and cooling temperature).
 - f. Assays of Vitamin A, D, and/or A & D fortified milk and milk products made at least annually in an IMS Listed Laboratory. Credit for vitamin fortified product not given unless vitamin analysis is completed and records are available. (Each fortified product evaluated separately.)
8. Sampling procedures approved by PHS/FDA evaluation methods (Section 6 - Examination of Milk and Milk Products, Evaluation of Milk Laboratories and Standard Methods for the Examination of Dairy Products).
- a. See Part IV, Guidance for Computing Enforcement Credit for Part I, Item 9 and Part II, Item 8.
 - b. Items 4 and 7 of the Evaluation of Sampling Procedures Form are not applicable when

calculating enforcement scores for Report of Enforcement Methods, Part II, Item 8.

9. Permit issuance, suspension, revocation, reinstatement, hearings and/or court action taken as required (Section 3 - Permits, Section 5 - Inspection of Milk Plants, Section 6 - Examination of Milk and Milk Products and Section 16 - Penalties). (Prorated by enforcement action(s) in compliance.)

SANITATION REQUIREMENTS

- a. Permit issuance based on compliance.
- b. Notice issued for intent to suspend permit if inspection(s) disclose a violation of ordinance requirement(s). Reinspection(s) made as required.
- c. Permit suspended upon repeated violation(s).
- d. Action to revoke a permit taken upon multiple suspensions.
- e. Hearings provided for as required.
- f. Reinstatement procedures followed: Within one (1) week of the receipt of notification, an inspection shall be made and as many additional inspections as necessary to determine compliance.
- g. Milk products processed during suspension for repeated inspection violations are not eligible for sale as Grade "A".

PRODUCT COMPLIANCE

- a. All product violations followed promptly by an inspection to determine the cause(s).
- b. When 2 out of the last 4 samples exceed the limits, written notice sent, additional sample taken within 21 days of date of notice, but not before 3 days.
- c. When 3 out of last 5 samples exceed the limits, or a positive drug residue or pesticide residue, permit immediately suspended.
- d. (Temporary) permit issued as required on reinstatement(s) and reinspection made within one week after proper notification (except for drug residues).
- e. Reinstating samples taken not more than 2 per week, on separate days, within a 3-week period.
- f. Violation of vitamin fortification levels (see M-I-92-13) determine cause and re-sample or withhold from the market.
- g. Positive phosphatase - determine probable cause and correct before further sale of milk allowed.
- h. Positive drug residues or pesticide test - investigate, determine probable cause and correct before further sale of milk allowed.

i. Permit suspension upon violation of:

- (1) Section 3 for serious health hazard; or
- (2) Section 5 for sanitation and/or uncorrected critical processing elements; or
- (3) Section 5 for consecutive violation(s) of the same requirement of Section 7; or
- (4) Section 6 for bacterial and Coliform counts if product not otherwise withheld.

j. All permit issuance, suspension, revocation, etc., as required by ordinance.

10. Records systematically maintained and current (Section 3 - permits, Section 4 - Labeling, Section 5 - Inspection of Milk Plants, Section 6 - Examination of Milk and Milk Products. Section 7 - Standards for Milk and Milk Products.) (Make use of both general and specific record-keeping deficiencies to determine value.)

a. Permit records available, accurate and current including permit suspension, notices, reinstatement, etc.

b. Record of inspection and equipment tests on file at regulatory agency back to the last rating (at least 12 months). (Entered on milk ledger form or computer.)

- c. All bacterial, Coliform, cooling temperature, phosphatase, drug residues, pesticide (if available), and vitamin assay results recorded on appropriate ledger or computer system for each individual milk and milk product.
 - d. Records maintained on bacteriological examination of milk containers (if required).
 - e. Vitamin concentrate volume control records complete and on file at the plant as required.
 - f. Within the rating period; plan review file in order and written approval given for construction during the rating period.
- b. Include in label review:
 - (1) A representative label(s) for all products produced, including raw commingled, labeled according to ordinance definition and applicable CFR's.
 - (2) Vehicles hauling milk must be properly marked (signed).
 - (3) Milk cans from producers properly identified.
 - (4) Bills-of-lading and farm weight tickets contain all the required information, including BTU #.

- 4. Provisions of Section 11 followed when milk and milk products are imported [imported milk also includes milk from within the state] (Section 11 - Milk and Milk Products from Points Beyond the Limits of Routine Inspection). (All or nothing item.)

PART III. INDIVIDUAL SHIPPER RATING

- 1. Refer to "Total Credit, Part I" value and multiply by "Weight" if farms are involved. (See instructions below Part III on the form.)
- 2. Refer to "Total Credit, Part II" value and multiply by "45" if farms are involved or by "90" if farms are not involved. (See instructions below Part III on the form.)
- 3. All milk and milk products properly labeled (Section 4 - Labeling).
 - a. Prorated by product: Number of different products correctly labeled vs. total number of products, including raw commingled.

Rated milk supplies:

- equal to (or greater) than that of the local supply; or
- imported supply with 90% or higher sanitation compliance rating. and enforcement ratings; or
- produced or processed under requirements substantially equivalent to the NCIMS (applicable for supplies produced and/or processed outside the United States and

accepted by FDA and the NCIMS).

NOTE: All records of:

- inspections (farms, receiving and transfer station, plants, samplers and vehicles),
- laboratory information (raw milk, finished milk products, vitamins, water and cooling media) and
- equipment checks must be summarized in ledger form. Computer ledgers are acceptable.

PART IV. GUIDANCE FOR COMPUTING ENFORCEMENT CREDIT FOR PART I, ITEM 9 AND PART II, ITEM 8

The “Evaluation of Sampling Procedures” form is used to determine enforcement credit for Item 9 – Report of Enforcement Methods (Dairy Farms), Part I and Item 8 – Report of Enforcement Methods (Milk Plant), Part II (2359j). Items 4 and 7 do not apply when calculating enforcement scores for Report of Enforcement Methods, Part II, Item 8.

- Item 1 Sampling Surveillance Officers Properly Certified
- a. State Sampling Surveillance Officer certified by FDA.
 - b. Certification valid for 3 years.
 - c. Surveillance Officer shall be a certified Milk or Laboratory Rating Officer.

- Item 2 Adequate Training Program
- a. Reference material available to samplers.
 - b. Training program conforms to established procedures.
 - c. Training program implemented.
- Item 3 Sample Surveillance Authority Properly Delegated
- a. Proper delegation procedures.
 - b. Only those eligible receive delegated authority.
 - c. At least 5 joint evaluations (including 1 pasteurized sample exercise if applicable) with 80% agreement on each item.
 - d. Redelegation at least each 3 years.
 - e. Proper certification of industry fieldmen when applicable.

- Item 4 License or Permit Issuance (Applies to Part I only).
- a. All bulk milk hauler/samplers have a valid license or permit.
 - b. Only bulk milk hauler/samplers who comply with Ordinance requirements shall be entitled to receive a license or permit.

- Item 5 Sampler Evaluations each Two Years and Reports Filed as Required
- a. Each sampler shall have his sample collection procedures evaluated by a certified or properly delegated certified Evaluation Officer each 2 years.
 - b. Proper agencies are advised of all samplers and of all evaluations annually in accordance with procedures.
- Item 6 Sampling Procedures in Substantial Compliance
- a. Appraisal of each sampler's compliance done by record review.
 - b. Appraisal of sampler's compliance.
 - c. Evaluation criteria neither too stringent nor too lenient.
- Item 7 Permit Suspension, Revocation, Reinstatements, Hearings and/or Court Actions (Applies to Part I only).
- a. Action taken on repeat violations of sampling requirements.
 - b. Re-evaluations made as required.
- Item 8 Records Systematically Maintained and Current
- a. Copies of training materials and other related information on file for review.
 - b. Records of delegation of sample evaluation authority to other State, local, or industry individuals on file and available for review with the producer or plant records.
 - c. Records of each sampler evaluation be on file and available for review with the producer or plant records.
 - d. Records for each sampler evaluation shall be entered on individual history cards.
 - e. Records of permit or license issuance, suspension, reinstatement, revocation, and hearings be on file and available for review.
 - f. Records for bulk milk hauler/sampler inspections will be on file.