



**FOOD DEFENSE VERIFICATION PROGRAM  
OFF-PREMISE FREEZER CHECKLIST**

Name of Applicant:	Date of Audit:
Address of Facility:	Facility Contact Person: Name: Title: Email:
Facility Phone Number:	Auditor's Name:

**AUDIT STATUS**

Audit Type: Original On-site Audit  (or) Corrective Actions Audit 1/

If Corrective Action Audit, then check applicable below:

- First Corrective Action Audit 2/  (or) Second Corrective Action Audit 3/
- Desk  (or) On-site
- Date Auditor Received Corrective Actions: \_\_\_\_\_

APPROVED  (or) PENDING CORRECTIVE ACTION RESPONSE

1/ Auditor will receive written corrective action responses (CARs) from the facility representative within 14 calendar days from the day of the original on-site audit. Auditor will close out all CAR's within 14 calendar days from the day the CAR's were submitted by the facility representative.  
2/ If CARs from the facility representative is not acceptable during the first corrective action audit, the applicant will have 7 additional calendar days to provide a written CAR that effectively closes out the remaining non-conformances.  
3/ USDA, AMS Commodity Procurement Staff will be notified if CARs remain open after the second corrective actions audit.



## FOOD DEFENSE DEFINITIONS

- **Secured Access:** Secured access prevents unauthorized access to the premises.
- **Controlled Access:** Controlled access prevents unauthorized access into processing and food handling areas of the facility. Additionally, monitoring controls are necessary to safeguard product against intentional contamination.
- **Restricted Access:** Restricted access prevents unauthorized access to critically vulnerable buildings, rooms, and areas.
- **Monitor:** A method of supervising or observing an activity.
- **Facility:** A building where products and ingredients are received and food products are produced, processed, and/or stored.
- **Premises:** The physical site or location of the business under control of management. This includes the facility and associated parking lots, offices, access roadways, off-site laboratories, and other areas under management control.

### 1. FOOD DEFENSE PLAN MANAGEMENT

YES	NO	N/A	EVALUATION ELEMENT
			<p><b>1a. Does this facility have a documented food defense plan that includes emergency contacts and telephone numbers?</b></p> <ul style="list-style-type: none"> <li>• A food defense plan shall be developed and implemented. The plan shall include evacuation procedures.</li> <li>• Specially designated entry points for emergency personnel shall be identified in the plan.</li> <li>• Current local, State, and Federal Government Homeland Security contacts and public health officials shall be listed in the plan along with their respective phone numbers. This list shall be assessed and updated regularly.</li> <li>• The plan shall include the immediate recall of adulterated products from trade and consumer channels.</li> </ul>
			<p><b>1b. Is there a designated person or team to oversee and implement the food defense plan?</b></p> <p><b>Name(s):</b> <b>Phone:</b></p> <ul style="list-style-type: none"> <li>• A food defense management team or coordinator shall be identified for each facility.</li> <li>• Each member shall be assigned clear responsibilities.</li> </ul>
			<p><b>1c. Is the food defense plan reviewed and reassessed periodically by management to assure it remains relevant to the operation?</b></p> <ul style="list-style-type: none"> <li>• Food security assessments of the facility should be conducted regularly by management to verify key provisions of the plan.</li> </ul>
			<p><b>1d. Have facility employees received training in food defense, and is the training documented?</b></p> <ul style="list-style-type: none"> <li>• Food defense training on security procedures shall be given to all facility employees. Facility representatives may access free food defense awareness training for their employees at: <a href="http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm353774.htm">http://www.fda.gov/Food/FoodDefense/ToolsEducationalMaterials/ucm353774.htm</a></li> <li>• Review food defense training records for employees.</li> <li>• Verify food defense training materials are applicable for all employees.</li> </ul>



			<p><b>1e. Are employees instructed to report signs of possible product tampering or suspicious activity relative to the food defense program?</b></p> <ul style="list-style-type: none"> <li>All employees shall be instructed to report any sign of possible product tampering or break in the food security system.</li> </ul>
<b>2. OUTSIDE SECURITY</b>			
<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>EVALUATION ELEMENT</b>
			<p><b>2a. Is the facilities outside premises secured to prevent entry by unauthorized persons or monitored for suspicious activity (e.g., security fence, video, security service, etc.)?</b></p> <ul style="list-style-type: none"> <li>Integrity of the facility perimeter shall be secured, and may be monitored for signs of suspicious activity or unauthorized entry.</li> <li>All entry ways into the facility may be secured by guards, alarms, cameras, etc.</li> </ul>
			<p><b>2b. Do emergency exits have secure doors that are self-locking, fitted with alarms, or monitored?</b></p> <ul style="list-style-type: none"> <li>Emergency exit doors should be secured via self-locking, fitted with alarms, or monitored.</li> <li>Verify via observation.</li> </ul>
			<p><b>2c. Are exterior lights located at exterior entry ways to the facility?</b></p> <ul style="list-style-type: none"> <li>Outside lights should be located at exterior entry ways to the facility to allow detection of unusual activities.</li> </ul>
			<p><b>2d. Is positive identification required to control entry of visitors to the facility (e.g., picture IDs, sign-in/sign-out, etc. at entrance)?</b></p> <ul style="list-style-type: none"> <li>Entry into facility should be controlled by requiring positive identification (e.g., picture IDs, sign-in and sign-out at security or reception, etc.) or be monitored, which may include the use of surveillance cameras and/or periodic visual observation by designated employees. Documentation and records are useful to support monitoring activities.</li> </ul>
			<p><b>2e. When entering or leaving a restricted gated area, are vehicles randomly inspected for unusual cargo or activity?</b></p> <ul style="list-style-type: none"> <li>To include a random inspection of all vehicles (e.g. commercial, visitors, employee, etc.).</li> </ul>
<b>3. INSIDE SECURITY</b>			
<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>EVALUATION ELEMENT</b>
			<p><b>3a. Is active surveillance of the interior of the facility maintained?</b></p> <ul style="list-style-type: none"> <li>Facility interior shall be monitored manually or mechanically daily using records or monitoring of internal surveillance (e.g., shift rosters, attendance logs, etc. confirming areas are monitored).</li> </ul>



			<p><b>3b. Are all restricted areas (e.g., chemical storage, ingredient storage, etc.) within the facility clearly marked and do they include the use of locks or key cards that prevents unauthorized access to critically vulnerable areas?</b></p> <ul style="list-style-type: none"> <li>• Restricted areas inside the facility shall be clearly marked and include the use of locks or key cards.</li> <li>• Restricted access may be augmented with monitoring.</li> <li>• Access to in-plant laboratory (including laboratory reagents, hazardous materials, etc.) shall be restricted.</li> <li>• Documentation and records are useful to establish and support restricted access.</li> </ul>
			<p><b>3c. Are visitors, guests, and other non-facility employees (e.g., contractors, salespeople, truck drivers, etc.) restricted to non-product areas unless accompanied by an authorized facility employee?</b></p> <ul style="list-style-type: none"> <li>• Visitors, guests, and other non-facility employees (contractors, salespeople, truck drivers, etc.) should be restricted to non-product areas unless accompanied by an authorized facility representative.</li> </ul>
<b>4. SHIPPING AND RECEIVING SECURITY</b>			
<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>EVALUATION ELEMENT</b>
			<p><b>4a. Are loaded trailers on the premises maintained under lock and/or seal? Are empty trailers inspected prior to loading?</b></p> <ul style="list-style-type: none"> <li>• All loaded trailers on the premises should be locked and/or sealed.</li> <li>• A documented procedure should be in place to demonstrate that trailers are inspected prior to loading.</li> </ul>
			<p><b>4b. Is the loading and unloading of vehicles transporting raw materials, finished products, or other materials used in food processing monitored?</b></p> <ul style="list-style-type: none"> <li>• Procedures shall be in place to monitor the loading and unloading of vehicles transporting raw materials, finished products, or other materials used in food processing.</li> <li>• Security in this area is monitored manually or mechanically.</li> </ul>
			<p><b>4c. Are outgoing USDA commodity contract shipments being delivered to contracted destination(s) sealed with a traceable, tamper-evident, commercial seal or high security seal on transports?</b></p> <ul style="list-style-type: none"> <li>• Seal numbers shall be recorded on the shipping documents.</li> </ul>
			<p><b>4d. Is access to loading docks controlled to avoid unauthorized deliveries?</b></p> <ul style="list-style-type: none"> <li>• Loading docks shall be controlled.</li> <li>• Loading docks shall be monitored, which may include the use of surveillance cameras and/or periodic visual observation by designated employees.</li> </ul>
			<p><b>4e. Are all deliveries checked against the roster of scheduled deliveries?</b></p> <ul style="list-style-type: none"> <li>• Bills of lading shall be maintained for all inbound activity.</li> </ul>



5. MAIL HANDLING SECURITY			
YES	NO	N/A	EVALUATION ELEMENT
			<p><b>5a. Is mail handling activity conducted in a separate room or facility away from operations?</b></p> <ul style="list-style-type: none"> <li>• Mail handling activity shall be done in a separate room or facility away from operations.</li> </ul>
			<p><b>5b. Are mail-handlers trained to recognize and handle suspicious pieces of mail using U.S. Postal Service guidelines? Helpful information is provided at the following website:</b></p> <p><a href="https://about.usps.com/publications/pub166.pdf">https://about.usps.com/publications/pub166.pdf</a></p> <ul style="list-style-type: none"> <li>• Mail handlers shall be trained to recognize and handle suspicious pieces of mail using U.S. Post Office guidelines.</li> </ul>
6. PERSONNEL SECURITY			
YES	NO	N/A	EVALUATION ELEMENT
			<p><b>6a. Prior to hiring, are background checks [e.g., employee references and/or immigration status (INS Form I-9)] conducted on all employees and contractors (both permanent and seasonal) who will be working in sensitive operations?</b></p> <ul style="list-style-type: none"> <li>• Sensitive operations as determined by the facility are applicable to the identified food defense risks.</li> </ul>
			<p><b>6b. Are procedures in place to ensure positive identification/recognition of all employees entering the facility?</b></p> <ul style="list-style-type: none"> <li>• A system of positive identification/recognition (e.g., picture IDs, sign-in and sign-out at security or reception, etc.) of all employees entering the facility shall be in place.</li> <li>• An updated daily or shift roster of facility personnel may be maintained and distributed to supervisors.</li> </ul>
			<p><b>6c. Are procedures in place controlling access to employees entering the facility during times the facility is not operating (e.g., weekends, holidays, etc.)?</b></p> <ul style="list-style-type: none"> <li>• Procedures shall be established for controlled entry of employees into the facility during times that the facility is not operating.</li> <li>• Documentation and records are necessary to establish and support monitoring activities.</li> </ul>
			<p><b>6d. Is there a policy describing the personal items that are prohibited inside the facility?</b></p> <ul style="list-style-type: none"> <li>• The facility shall establish and enforce a policy on what personal items may and may not be allowed inside the facility.</li> </ul>



### COMMENTS SECTION

- List question number and non-conformance to include objective evidence.
- If Corrective Action Audit with an acceptable response - list the question number, the non-conformance, a brief description of the CAR, and then the words, “adequately addressed”.
- If Corrective Action Audit with unacceptable response - list the question number, the non-conformance, a brief description of the CAR, the words, “inadequately addressed,” and a brief description why the corrective action was not acceptable.