

Standardization Program for Retail Food Inspectors

The U.S. Food and Drug Administration (FDA) have provided criteria for a Retail Food Protection Standardization Program. The purpose is to improve food safety and achieve a high degree of uniformity throughout the nation in both the requirements and the manner of enforcement of state and local laws governing sanitation in the retail food industry. FDA has standardized Indiana State Department of Health (ISDH) Food Protection Specialists in uniform interpretation of FDA Model Food Code Standards and preparation of appropriate forms.

The ISDH Food Protection Program has established a similar standardization program for local health department personnel in Indiana. The requirements are essentially the same as those that the FDA Standardization Program used for the standardization of the ISDH Food Protection staff and are set forth in the *Procedures for Standardization and Certification of Retail Inspection/Training Officers*.

INTRODUCTION

FDA has provided the ISDH Food Protection Program the current “Procedures for Standardization and Certification of Retail Inspection/Training Officers”. These procedures are focused on the 2001 FDA Model Food Code and have been adapted to the “Retail Food Establishment Sanitation Requirements, 410 IAC 7-24” (referenced hereafter as Rule). The updated standardization procedures involve food safety interventions, identification of risk factors known to contribute to foodborne illness, and a Hazard Analysis Critical Control Point (HACCP) based inspection.

This document sets forth uniform procedure to be followed by the FDA Standardized Inspection/Training Officer and State Standardized Inspection/Training Officer (FDA/State Standardized Inspection/Training Officer) for standardizing local and state health department food specialists and/or other related agency personnel to perform retail food establishment inspections.

Standardization of local and state health department food protection personnel is highly recommended by both the FDA and ISDH Food Protection Program. Standardization should provide increased accuracy and uniformity in inspection results and assist the local health department in dealing with industry, the news media and court systems regarding any significant public health problem encountered in retail food establishments.

Through the application of this procedure, the candidate will demonstrate knowledge and expertise in the understanding, application and interpretation of food code interventions; foodborne illness risk factors, HACCP principles, use of essential inspection equipment, and will exhibit necessary communication skills in conducting a food establishment inspection. This procedure is not intended to provide basic training for newly employed candidates. The candidate shall meet all the requirements of the procedure in order to be standardized by a FDA/State Standardized Inspection/Training Officer.

PREREQUISITE TRAINING AND EXPERIENCE

This chapter explains the prerequisite training and experience requirements for candidates to qualify for standardization.

In order for the ISDH Food Protection Program to engage in the process of field inspections for the purpose of standardization and certification, the candidate must qualify by fulfilling the training and experience requirements specified in this chapter. These eligibility requirements only apply to first time candidates for standardization. Once standardized, the individual only needs to meet the standardization maintenance requirements.

Any individual working in the field of food protection for a local health department, ISDH or other state agency may apply for standardization. The employing health agency/department will provide background information about the candidate to this program. This should include present duties, academic training, experience in retail food protection and related fields, and length of service with the agency/department.

A. Applicants for initial state standardization must:

1. Be routinely engaged in retail food protection work;
2. Have job responsibility of conducting routine inspections and the capability to conduct food safety training or standardization of other regulatory personnel;
3. Have successfully completed, within the preceding two (2) years, at least 20 contact hours of training in the application of food science and related studies such as: microbiology, epidemiology, regulations, plan review or HACCP principles.
4. Have fulfilled one (1) or more of the following prerequisites:
 - a. At least one (1) year of full-time experience in retail food establishment inspections within the past three (3) years, or
 - b. At least 100 retail food establishment inspections performed within the past three (3) years, such as enforcement, training or consultation inspections.
 - c. Program reserves the right to request documentation supporting the qualifying requirements.

B. When an applicant's supervisor submits the *Standardization Nomination Form (Annex 1)*, documentation of having fulfilled the above eligibility requirements must also be provided. The candidate's supervisor must sign, date and submit the form to the ISDH Food Protection Program.

C. Applicants who do not meet eligibility requirements may later request standardization, after completing the unmet requirements.

SCOPE

A. Performance Areas

The following areas of performance shall be addressed by the candidate during the retail food establishment inspections and evaluated by the trainer.

1. **Good Retail Practices (GRPs):** The candidate shall demonstrate knowledge of rule provisions related to good retail practices and the ability to interpret and apply them.
2. **Risk-Based Inspection:** The candidate shall demonstrate knowledge of rule provisions related to rule interventions and risk factors which are most frequently associated with foodborne illness or injury.
3. **Application of HACCP:** The candidate shall demonstrate the ability to verify compliance with an existing HACCP plan and shall demonstrate the ability to apply all seven (7) HACCP principles to the inspection process.
4. **Inspection Equipment:** The candidate shall be equipped and familiar with inspection equipment essential to each retail food establishment inspection. During the inspection, the candidate shall demonstrate knowledge of proper use of essential inspection equipment.
5. **Communication:** The candidate shall demonstrate the ability to effectively communicate with the person-in-charge (PIC) and explain significant inspection findings to the PIC at the conclusion of the inspection.

B. Methodology

1. **Initial Standardization:** The trainer and the candidate shall conduct eight (8) joint field inspections of retail food establishments, including at least one (1) with a HACCP plan, selected by the trainer. The retail food establishments selected for inspection during standardization should be in the menu category 3, 4 or 5 as described in the Rule (**Appendix A, Page 107**). All eight (8) inspections for initial standardization should be completed within a reasonable period of time, not to exceed 12 months.
2. **Standardization Recertification:** The trainer and the candidate will conduct six (6) joint field inspections of retail food establishments, including at least one (1) with a HACCP plan, selected by the trainer. The food establishments selected for inspection during standardization recertification should be in menu category 3, 4 or 5 as described in the Rule (**Appendix A, Page 107**). All six (6) inspections for re-certification should be completed within a reasonable period of time, not to exceed three (3) years.
3. **Options of the Trainer:** The trainer has the option of adjusting the time period, type of facility selected, and methodology for inspection at any time to enhance the effectiveness of the standardization process.

4. **Performance Evaluation Methods:** The performance of the candidate shall be evaluated by the trainer using the methods outlined in the following table:

TABLE #1

SUMMARY OF INSPECTION METHODS FOR EACH PERFORMANCE AREA

<u>PERFORMANCE AREA</u>	<u>INITIAL STANDARDIZATION</u>	<u>RE-STANDARDIZATION</u>
Good Retail Practices	Joint Inspections	Joint Inspections
Risk-Based Inspections	Joint Inspections	Joint Inspections
Application of HACCP Principles	<ul style="list-style-type: none"> • Risk Control Plan • Process Flow Charts • Verification of existing HACCP Plan, and • Orally communicates seven (7) principles of HACCP 	<ul style="list-style-type: none"> • Risk Control Plan • Process Flow Charts (optional) • Verification of existing HACCP Plan
Inspection Equipment	Field Observations	Field Observations
Communications	Field Observations	Field Observations

- NOTE:**
1. All of the initial standardization requirements are to be completed during a total of eight (8) joint evaluations with the trainer over a period not to exceed 12 months.
 2. The maintenance requirements are to be completed during a total of six (6) joint evaluations with a trainer over a period not to exceed three (3) years.

INSPECTION

A. Field Exercise

1. **Candidate Inspection Duties:** During all joint retail food establishment inspections, the candidate shall take the lead. The candidate shall make introductions and determine who the PIC is at the beginning of each inspection.

The candidate shall record all observations and inspection data collected during the inspection. For the purpose of tracking temperature patterns, it is

recommended that the candidate perform a preliminary survey of food temperatures early in each inspection.

At various times during the field exercise, the candidate shall be directed to perform specific tasks, such as explaining rule requirements, citing rule provisions, calibrating inspection equipment, and preparing flow charts or reviewing HACCP records to demonstrate proficiency in each area.

2. **Performance Areas:** During the inspection, the trainer shall observe and evaluate the candidate based on the candidate's interpretation and application of the provisions in the Rule. Five (5) performance areas are included in the evaluation:
 - a. Good Retail Practices (GRPs);
 - b. Risk-Based Inspection;
 - c. Application of HACCP principles;
 - d. Inspection equipment; and
 - e. Communication skills.
3. **Comparison of Findings:** Following each joint retail food establishment inspection the candidate shall compare his/her findings with the trainer's and the differences shall be thoroughly discussed before proceeding to the next inspection.

The trainer shall retain copies of the candidate's inspection reports, flow charts, and RCP to document satisfactory completion of the standardization requirements.

At the conclusion of the field exercise, the trainer shall tabulate and review the candidate's inspection results and other observations to determine if the candidate has successfully completed the requirements for standardization.

B. Performance Criteria

To be certified, the candidate shall meet the following criteria for each performance area:

1. **Good Retail Practices and Risk-Based Inspection**
 - a. **Inspection Report:** At the conclusion of each inspection, the candidate shall complete a *Standardization Inspection Report (Annex 2)* based on observations and data collected during the inspection. The candidate shall

determine which items on the inspection report form were in or out of compliance, not observed, and/or not applicable based on the observations.

- b. Candidate Scoring:** The trainer shall grade each *Standardization Inspection Report (Annex 2)* by circling each incorrectly marked item and discussing these items with the candidate after each inspection.

The trainer may mark an item “D” to reflect disagreement in a case where the candidate has the opportunity to make an observation or take a measurement and fails to do so. Intervention by the trainer would alert the candidate to the missed opportunity. A scoring of “D” should be used in instances such as when an opportunity to take a cooked hamburger temperature is available, but the candidate does not take the temperature and subsequently marks 5.1(B) as NO. The trainer’s scoring of an item as “D” represents a disagreement between the candidate and the trainer.

At the conclusion of each inspection, the trainer shall determine the number of disagreements on items and record that number in the chart provided in **Annex 8**. At the completion of the final inspection, the trainer shall total the number of disagreements for all the retail food establishment inspections.

- (1) To satisfy the risk-based inspection performance area, the candidate shall not disagree with the trainer on **more than 11 items in any one (1) establishment** in this section of the *Standardization Inspection Report* and have a total **average number of agreements of at least 90%**.
- (2) To satisfy the GRPs inspection performance area, the candidate shall not disagree with the trainer on **more than five (5) items in any one (1) establishment** in this section of the *Standardization Inspection Report* and have a total **average score of at least 85%**.

2. Application of HACCP Principles

During the retail food establishment inspections, the candidate shall demonstrate the proper inspection approach for retail food establishments with pre-existing HACCP plans and those without HACCP plans. Each candidate shall demonstrate an understanding of HACCP by:

- a. Flow Charts: Required for initial standardization and optional for standardization recertification**

- (1) **Preparing Process Flow Charts:** During the joint inspections, the trainer shall select a total of three (3) processes for the candidate to describe on a flow chart.

- (a) Process 1 - “No cook step”;
- (b) Process 2 - “Same day service”; and
- (c) Process 3 - “Complex food preparation”.

The candidate shall develop a flow chart using the information gained through actual observations of operational steps during an inspection. Information gained through discussion with the PIC and/or food workers should be used to substitute for a lack of observations of the operational steps not occurring during the inspection. On each flow chart, the candidate shall identify the hazards, CCPs, and CIs. The candidate shall indicate the CIs as stated by the Rule and by the establishment, if differing from those of the Rule. In addition, the candidate shall also indicate to the trainer, the CCPs which the establishment did not control.

- (2) **Requirements:** The trainer shall grade the three (3) flow charts based on the correct identification of hazards, CCPs and CLs. To satisfy this requirement, the three (3) flow charts may contain no more than two (2) errors or omissions.

The “FDA Retail HACCP Guide: Managing Food Safety, A HACCP Principles Guide for Operators of Food Service, Retail Food Stores, and Other Food Establishments at the Retail Level” and the current edition of the Rule will be the reference documents for this exercise.

b. Risk Control Plan: Required for both initial standardization and recertification

- (1) **Developing a Risk Control Plan:** During at least one (1) of the joint inspections for both initial standardization and recertification inspections, the trainer will select a CCP that the candidate has determined is not in compliance with CLs set by the Rule. The candidate shall complete **Annex 5**, in order to demonstrate a clear understanding of the observation, process, hazard, critical limits, and corrective actions that are being targeted for a RCP. The candidate shall then develop a mock RCP with the PIC. The RCP should stress simple control measures that can be integrated into the daily routine of the retail food establishment. The plan should be brief and address the following points:

- (a) What hazard needs to be controlled;
- (b) How the hazard will be controlled;
- (c) Who is responsible for control; and
- (d) What monitoring, record-keeping and corrective actions are required.

(2) **Requirements:** To satisfy the requirements, all four (4) points shall be addressed in the RCP. The candidate is not required to ask the PIC to commit to implementation of the RCP.

c. **HACCP Plans: Required for both initial standardization and maintenance inspections.**

(1) **Verification of HACCP Plans:** During the joint inspections, the candidate shall select at least one (1) retail food establishment to inspect that has implemented a HACCP plan. The candidate shall demonstrate the ability to verify that the HACCP plan is implemented by reviewing the retail food establishment's monitoring procedures and record keeping, verifying that CLs are met, and by substantiating that corrective actions are taken when the CLs are not met. The trainer shall select at least one (1) CCP for the candidate to verify.

The candidate shall review the records for the selected CCPs for three (3) specific 24-hour periods, which shall include records for the current day and two (2) additional days selected at random. Based on this review, the candidate shall make the following determinations regarding monitoring, record keeping and the performance of corrective action for a total of nine (9) HACCP plan record answers.

- (a) Required monitoring was performed on the three (3) selected dates;
- (b) Accurate and consistent records appear for the selected dates; and
- (c) Corrective action was documented in accordance with the plan when CLs were not met on each of the three (3) selected dates (candidate shall select the three (3) days of records through discussions with the PIC).

- (2) **HACCP Principles (for initial standardization only):** The candidate shall orally communicate to the trainer the HACCP principles and how they would apply to the food establishment operation.
 - (3) **Requirement:** The candidate shall record the determination under “Records” on the *Standardization Inspection Report (Annex 2)*, and document findings on the *HACCP Plan Verification Summary (Annex 6)*. To satisfy this requirement, the candidate and the trainer shall be in agreement in at least eight (8) out of nine (9) HACCP record answers on the *HACCP Plan Verification Summary (Annex 6)*.
 3. **Inspection Equipment:** The candidate shall have the essential equipment (**listed in III (B)**) available for use during each inspection and shall demonstrate the necessary knowledge of equipment to conduct a retail food establishment inspection. The candidate shall know how to properly use and maintain the equipment. Specifically, the candidate shall demonstrate that the temperature-measuring device is accurate at 32°F and 212°F.
 4. **Communications:** In accordance with **Chapter IV** of this procedure, the candidate shall take the lead in communicating with industry personnel during each of the inspections in the following three (3) areas:
 - a. Introduction;
 - b. PIC interview; and
 - c. Exit conference.

During the inspections, the candidate shall demonstrate, by example, the concepts of food safety such as washing hands at the appropriate place and time and wearing the proper inspection apparel.

The trainer shall observe and evaluate the candidate by focusing attention on communication skills that relay to the PIC, the compliance status and any observations, concerns, and alternatives for compliance. Satisfactory performance is achieved if this information is conveyed in a way that is understood, accepted and acted upon.

C. **Assessment - Level of Agreement with Performance Criteria.**

1. *Scoring Form and Instructions for Scoring and Determining Performance, (Annex 8)* can be used to tally the number of disagreements on the items between the trainer and the candidate in the GRPs and Risk-Based Inspection.

2. Criteria for Success:

- a.** To achieve standardization, the candidate shall meet the minimum requirements for the three (3) Performance Areas: GRPs, Risk-Based Inspection and Application of HACCP Principles. The candidate may receive “Needs Improvement” classification in the Equipment and Communications Performance Areas and still be certified.
- b.** When one (1) or both of these performance areas is classified as needing improvement, the candidate and supervisor shall be notified that the “Needs Improvement” area or areas must be satisfactorily addressed before recertification is granted.
- c.** Prior to recertification, the candidate’s supervisor must notify the trainer that the area or areas of concern have been addressed