

# Local Health Department Approaches to Meeting Retail Program Standards 3 and 6

June 20, 2019



# Overview

- Intent of Standards 3 and 6
- FDA Resources
- An approach to Standard 3
- An approach to Standard 6

# Housekeeping Items

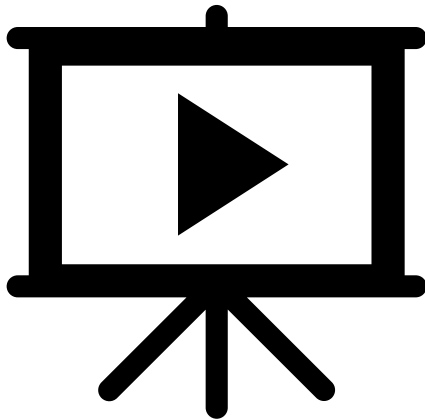
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Throughout the presentation and during the discussion and Q&A session, please use the chat box to share your experiences and ask questions. The facilitator will pose your questions to the presenters.

# Recording

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A link to the recorded webinar will be emailed to all participants. This recording and past food safety sharing sessions can also be found the NACCHO website:

<https://www.naccho.org/programs/environmental-health/hazards/food-safety/mentorship>



Katey Kennedy

FDA Regional  
Retail Specialist



# VOLUNTARY NATIONAL RETAIL FOOD REGULATORY PROGRAM STANDARDS

## Standards of Excellence for Continuous Improvement

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# STANDARDS AS A PROGRAM FRAMEWORK

- **STANDARDS PROVIDE:**
- A guide to design and management of a retail food program
- A program foundation
- A tool to evaluate the effectiveness of food safety interventions.

# GOAL

- **Active Managerial Control**

of the risk factors that may cause foodborne illness



**REDUCTION IN FOODBORNE ILLNESS**



## Standard #3

### Inspection Program Based on HACCP Principles

- **Do inspections focus on the status of the key foodborne illness risk factors and the correction of out-of-control risk factors through**  
**ACTIVE MANAGERIAL CONTROL?**



## Standard #6

### Compliance and Enforcement

- **Do agency compliance procedures result in timely correction of out-of-control risk factors?**
- **Are appropriate enforcement actions taken when necessary and are they applied consistently across the industry?**

# RESOURCES

## FoodSHIELD PROGRAM STANDARDS RESOURCE CENTER

The screenshot displays a web browser window with the URL <https://www.foodshield.org/member/workgroups/about.cfm>. The page title is "Retail Food Program Standards Resource Center" and it is identified as a "Retail Food ( Open Group )".

**About**

This site is designed for federal, state, local, tribal, territorial regulatory agencies and non-regulatory organizations that are using the Voluntary National Retail Food Regulatory Program Standards (Retail Program Standards) for continuous program improvement. Since the release of the Retail Program Standards in 1998, enrolled jurisdictions have developed a variety of tools, templates, and documents to help them develop their retail food regulatory program and achieve conformance with each of the Standards. These tools, templates, and documents may be of interest to other agencies as they work to develop their retail food regulatory programs, while reducing the amount of time needed to develop and implement customized policies, procedures and documentation.

This site is administered by the Food and Drug Administration (FDA) and is intended to foster collaboration among retail food regulatory programs by enabling the sharing of tools, templates, and documents that have been developed by our state, local, tribal, and territorial partners. Documents posted on this site are not reviewed for accuracy by the FDA; therefore, the FDA does not make any endorsements about the documents available on this site. However, the FDA encourages the sharing of templates, tools, and new and innovative approaches to reduce foodborne illness risk factors. In addition to the tools, templates, and documents provided on this FoodSHIELD workgroup site, workgroup members can access the Food and Drug Administration's Retail Program Standards webpage for additional information, including:

- Upcoming events related to the Retail Program Standards;
- A copy of the Standards;
- A listing of jurisdictions enrolled in the Retail Program Standards;
- Questions and answers about implementation of the Standards;
- A crosswalk of the Retail Program Standards and the Public Health Accreditation Board (PHAB) Accreditation Process;
- A directory of Regional Retail Food Specialists; and
- Links to funding opportunities.

**Standards of Excellence for Continual Improvement**

**Folders:**

- A - Standard #1
- B - Standard #2
- C - Standard #3
- D - Standard #4
- E - Standard #5
- F - Standard #6
- G - Standard #7
- H - Standard #8
- I - Standard #9
- J - Self Assessment/Verification Audit Webinars

The bottom of the page features a "Leave us a message" button and a system tray showing the time as 5:26 PM on 6/17/2019.

# More RESOURCES

## NACCHO Website

[www.naccho.org/programs/environmental-health/hazards/food-safety/retail-program-standards-mentorship](http://www.naccho.org/programs/environmental-health/hazards/food-safety/retail-program-standards-mentorship)

## FDA Retail Food Program Standards

[www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-january-2017](http://www.fda.gov/food/voluntary-national-retail-food-regulatory-program-standards/voluntary-national-retail-food-regulatory-program-standards-january-2017)

- Current Version
- CLEARINGHOUSE
- Funding Opportunities

# Q&A Session





Jeanne Garbarino

- Standard 3
- Vineland Health Department, NJ



# Standard 3

(Differences and Commonalities with  
Standard 6)

With Lessons Learned



## Standard 3

### Inspection Program Based On HACCP Principles

An inspection program that focuses on:

- Status of risk factors and interventions
- Determines/documents compliance of risk factors and interventions
- A primary objective of obtaining immediate and long-term correction of out-of-control risk factors through active managerial control.









## Requirement 2: Grouping food establishments

### Risk class or type


- Menu
- Population served

### At least 3 groups required

- Annex 5 gives an example with 4

**Annex 5, Table 1. Risk Categorization of Food Establishments**

RISK CATEGORY	DESCRIPTION	FREQUENCY #/YR
1	Examples include most convenience store operations, hot dog carts, and coffee shops. Establishments that serve or sell only pre-packaged, non-time/temperature control for safety (TCS) foods. Establishments that prepare only non-TCS foods. Establishments that heat only commercially processed, TCS foods for hot holding. No cooling of TCS foods. Establishments that would otherwise be grouped in Category 2 but have shown through historical documentation to have achieved active managerial control of foodborne illness risk factors.	1
2	Examples may include retail food store operations, schools not serving a highly susceptible population, and quick service operations. Limited menu. Most products are prepared/cooked and served immediately. May involve hot and cold holding of TCS foods after preparation or cooking. Complex preparation of TCS foods requiring cooking, cooling, and reheating for hot holding is limited to only a few TCS foods. Establishments that would otherwise be grouped in Category 3 but have shown through historical documentation to have achieved active managerial control of foodborne illness risk factors. Newly permitted establishments that would otherwise be grouped in Category 1 until history of active managerial control of foodborne illness risk factors is achieved and documented.	2
3	An example is a full service restaurant. Extensive menu and handling of raw ingredients. Complex preparation including cooking, cooling, and reheating for hot holding involves many TCS foods. Variety of processes require hot and cold holding of TCS food. Establishments that would otherwise be grouped in Category 4 but have shown through historical documentation to have achieved active managerial control of foodborne illness risk factors. Newly permitted establishments that would otherwise be grouped in Category 2 until history of active managerial control of foodborne illness risk factors is achieved and documented.	3
4	Examples include preschools, hospitals, nursing homes, and establishments conducting processing at retail. Includes establishments serving a highly susceptible population or that conduct specialized processes, e.g., smoking and curing; reduced oxygen packaging for extended shelf-life.	4



## Requirement 3: Frequency of Inspections

- No minimum
  - Inspect higher risk classes more than your low to medium risk facilities
- Examples such as Ga., NJ, and Other?



## Requirement 4: Written Policies and Procedures-

### Program policy must address:

- On-site corrective actions (appropriate)
- Discussion of long-term control options
- Follow-up activities

# FDA's corrective actions list.

## Suggested Immediate Corrective Actions and Intervention Strategies for Achieving Long-Term Compliance of Out-of-Control Procedures

Out-of-Control Procedure	Associated Hazards	Immediate Correction Action(s)	Intervention Strategies for Achieving Long-term Compliance
Bare Hand Contact with RTE Food	Bacteria, Parasites, and Viruses via Fecal-oral Route	Conduct Hazard Analysis. See participant manual for additional guidance.	RCP, Train Employees, SOP/HACCP Development
Cold Holding	Vegetative Bacteria, Toxin-forming and Spore-forming Bacteria, Scombrotoxin (Finfish)	Conduct Hazard Analysis. See participant manual for additional guidance.	Change Equipment, RCP, Train Employees, Develop SOP/HACCP/Recipe
Contaminated Equipment	Bacteria, Parasites, and Viruses	Clean and Sanitize Equipment; Discard or Reheat RTE Food.	Train Employees, Change Equipment or Layout, Develop SOP
Cooking	Vegetative Bacteria, Parasites, and Possibly Viruses	Continue Cooking to Proper Temperature.	Change Equipment, RCP, Train Employees, Develop SOP/HACCP/Recipe
Cooling	Toxin-forming and Spore-forming Bacteria	Conduct Hazard Analysis. See participant manual for additional guidance.	Change Equipment, RCP, Train Employees, Develop SOP/HACCP/Recipe
Cross-Contamination of RTE Foods with Raw Animal Foods	Bacteria, Parasites, and Possibly Viruses	Discard or Reheat RTE Food.	Change Equipment Layout, RCP, Train Employees, Develop SOP/HACCP/Recipe
Food Source/ Sound Condition	Bacteria/Parasites/ Viruses/Scombrotoxin/ Ciguatera Toxin	Reject or Discard.	Change Buyer Specifications, Train Employees
Freezing to Control Parasites	Parasites	Freeze Immediately; Discard; or Cook.	Change Buyer Specifications, RCP, Develop SOP/HACCP/Recipe, Change Equipment, Train Employees
Handwashing	Bacteria, Viruses, and Parasites	Wash Hands Immediately; Conduct Hazard Analysis. See participant manual for additional guidance.	Change Equipment Layout, Train Employees, RCP, Develop SOP/HACCP
Hot Holding	Toxin-forming and Spore-forming Bacteria	Conduct Hazard Analysis. See participant manual for additional guidance.	Change Equipment, RCP, Train Employees, Develop SOP/HACCP/Recipe
Receiving Temperatures	Scombrotoxin, Bacteria	Reject or Discard.	Change Buyer Specifications, Train Employees, Develop SOP/HACCP/Recipe
Reheating for Hot Holding	Vegetative Bacteria; Toxin-forming and Spore-forming Bacteria	Conduct Hazard Analysis. See participant manual for additional guidance.	Change Equipment, RCP, Train Employees, Develop SOP/HACCP/Recipe

## On-Site Corrective Action Procedures

Code Provision	Item # on Inspection form	Risk Factor	On-Site Corrective Action
511-6-1-.03(1)(a)-(c)  511-6-1-.03(2)  511-6-1-.03(2)(a)-(o)	1-2A	<b>Demonstration of knowledge</b> <ul style="list-style-type: none"> <li>The person in charge shall demonstrate knowledge of foodborne disease prevention and application of Hazard Analysis Critical Control Point principles.</li> </ul> <b>PIC Present</b> <ul style="list-style-type: none"> <li>There must be a designated person in charge</li> </ul> <b>Responsibility of PIC</b> <ul style="list-style-type: none"> <li>The person in charge must have controls in place in place regarding oversight and/or monitoring of duties <u>in regards to</u> risk factors.</li> </ul>	<ul style="list-style-type: none"> <li>A person in charge who can demonstrate knowledge through questions or is certified arrives</li> <li>Check on follow-up inspection</li> <li>On-site education of risk factors</li> </ul>
511-6-1-.03(3)(a) 511-6-1-.03(3)(b) 511-6-1-.03(3)(c) 511-6-1-.03(3)(d)	1-2B	<b>Certified Food Protection Manager</b> <ul style="list-style-type: none"> <li>At least one employee that has supervisory and management responsibility and the authority to direct and control food preparation and service must be a Certified Food Safety Manager</li> </ul>	<ul style="list-style-type: none"> <li>See flow charts for CFSM</li> </ul>
511-6-1-.03(4)(g)	2-1A	<b>Exclusions &amp; Restrictions</b> <ul style="list-style-type: none"> <li>Food employee is symptomatic of illnesses, or has been diagnosed of an illness or has been exposed to a foodborne pathogen</li> </ul>	<ul style="list-style-type: none"> <li>Restrict the food employee</li> <li>Exclude the food employee</li> <li>Suspend the permit</li> </ul>
511-6-1-.03(5) (a-c)	2-1B	<b>Handwashing</b> <ul style="list-style-type: none"> <li>Food employee observed not washing hands at appropriate time</li> <li>Food employees washing hands improperly</li> </ul>	<ul style="list-style-type: none"> <li>Employee(s) must be instructed to wash hands immediately including when and where to wash hands</li> </ul>
511-6-1-.04(4)(a)1,2,3,4(i)-(iii)	2-1C	<b>No Bare Hand Contact with Ready-to-Eat Food</b> <ul style="list-style-type: none"> <li>Ready-to-eat food is handled with bare hands</li> </ul>	<ul style="list-style-type: none"> <li>Discard if touched and advise employee how to handle ready-to-eat food with tongs, gloves, utensils etc.</li> <li>Heat food to 145°F</li> <li>Rewash uncooked produce</li> </ul>

511-6-1-.04 (6) (f)	6-1A	<b>Cold Holding</b> <ul style="list-style-type: none"> <li>Potentially hazardous food held above 41°F without a valid explanation from the operator regarding the process for more than 4 hours</li> <li>Potentially hazardous food held above 41°F <u>less than</u> 4hours</li> </ul>	<ul style="list-style-type: none"> <li>Instruct the PIC to discard the food and educate on cold holding requirements</li> <li>Consult with the operator to determine if potentially hazardous food item can be cooled to 41°F or cook or reheat to appropriate temperatures or discard the potentially hazardous food item</li> </ul>
511-6-1-.04(6)(f)	6-1B	<b>Hot Holding</b> <ul style="list-style-type: none"> <li>Potentially hazardous food held below 135°F without a valid explanation from the operator regarding the process for more than 4 hours</li> <li>Potentially hazardous food held below 135°F less than 4 hours</li> </ul>	<ul style="list-style-type: none"> <li>Instruct the PIC to discard the food and educate on hot holding requirements</li> <li>Consult with the operator to determine if potentially hazardous food item can be reheated to 165°F or discard the food item</li> </ul>
511-6-1-.04(6)(d)	6-1 C	<b>Cooling</b> <ul style="list-style-type: none"> <li>Potentially hazardous food cooled from 135°F to 70°F in <u>more than</u> 2 hours</li> <li>Potentially hazardous food cooled from 135°F to 41°F in <u>more than</u> 6 hours</li> <li>Potentially hazardous food made from room-temperature ingredients cooled to 41°F in <u>more than</u> 4 hours</li> </ul>	<ul style="list-style-type: none"> <li>Discard; If 2 hours or less - reheat to 165°F and use another cooling method</li> <li>Discard</li> <li>Discard</li> </ul>
511-6-1-.04(6)(i)	6-1D	<b>Time as Public Health Control</b> <ul style="list-style-type: none"> <li>Past time indicated</li> <li>Indicated time is more than 4 hours</li> <li>No written procedures and potentially hazardous food <u>is not</u> in compliance with cold or hot holding guidelines</li> <li>Time not marked on item</li> </ul>	<ul style="list-style-type: none"> <li>Discard</li> <li>Discard</li> <li>Discard</li> <li>Mark container with</li> </ul>





# On-site Corrective Actions for the “gray areas”

## Specific:

- Food additives improperly used to be discarded or placed on hold. (\*Washoe County Health Dept.)
- Switching to manual warewashing in the 3-compartment sink or use all disposables if the dishwasher is not sanitizing properly. (Vineland City Health Dept.)

## Very gray areas:

- Place hold (embargo) orders on situations that create questions about the food’s safety that need further investigation. (\*Snohomish Health Dept.)

## Examples:

- ROP fish thawed and stored at 41° F in original sealed bag
- Thawing a Scombridae species of fish at room temperature
- Holding cook-chill bags at 41° F for longer than **14 days**

\*Food Shield’s Resource Center



# Long-Term Control of Risk Factors requires:



COMMITMEN  
T BY  
MANAGERS  
OF FOOD  
ESTABLISHME  
NTS



SYSTEM  
CHANGES TO  
ADDRESS  
THOSE RISK  
FACTORS



RISK CONTROL  
PLANS, SOP'S,  
BUYER SPECS,  
MENU  
MODIFICATION  
, HACCP PLANS  
AND  
EQUIP/FACILITY  
CHANGES



## Follow-Up Activities:

Show the PIC  
that risk  
factors are  
important!

A jurisdiction must have a written policy that requires follow-up activities subsequent to violations of foodborne illness risk factors.

Standard 3 does not identify or require specific follow-up activities for risk factor violations.

The policy describing the appropriate follow-up activities and the circumstances which trigger those follow-up activities are left to the discretion of the jurisdiction.



When could a fax count as a “desk follow up”?

? Consumer advisory

? Training certificate

? Shellfish tags

Attachment 2

### Follow-up Notice



To: \_\_\_\_\_

Inspection Date:  
Establishment Number:

Inspection Time:  
State License No:

Violation(s) were documented that could not be corrected during the inspection and are listed below.  
**You are required to correct the violation(s) within 24 hours (or by date noted) and mail or fax this completed form to:**  
 Food Protection Services • 5051 South 129th East Ave. • Tulsa, Oklahoma 74134 • Fax: (918) 595-4339

**Note:** Failure to take corrective action could result in further enforcement or legal action.  
 Form must be completed with corrective action and date completed.

Sanitarian's Name & Signature: \_\_\_\_\_

Item # & Violation Description	24 hrs or Date below
Write Your Corrective Actions Taken:	
Write Your Corrective Actions Taken:	
Write Your Corrective Actions Taken:	
Write Your Corrective Actions Taken:	

Received This Notice:  
Establishment Representative Signature

Corrective Actions Were Completed:  
Establishment Representative Signature



# Requirement 5: Variance Code requests

## Variance Code requests related to risk factors

The jurisdiction must have a written policy addressing code variance requests related to risk factors and interventions. The policy should specify:

- The information required from the requestor.
- Alternate procedures and a justification for the variance.
- A HACCP plan may be required if it is relevant
- The criteria which will be used to determine the acceptability of the proposed variance.
- OR: A jurisdictional policy to disallow variances is acceptable.



# Requirement 6: HACCP Plans

- Procedures must include:
  - Validation of a plan
    - ROP
    - Smoking, Curing
    - Acidification
    - Sprouting, etc.
  - Verification of a plan
    - Frequency of inspections



# Documentation needed for an audit?



SELF-ASSESSMENT FORM



INSPECTION FORM DESIGN



WRITTEN PROCESS FOR GROUPING



INSPECTION FREQUENCY CHART



CORRECTIVE ACTION POLICIES AND PROCEDURES



VARIANCE REQUEST POLICY



VALIDATION AND VERIFICATION OF HACCP PLANS POLICIES

**Jurisdiction Name:** \_\_\_\_\_

Criteria	Jurisdiction's Self-Assessment			Auditor's Verification		
	YES	NO	Self-Assessor's General Comments	YES	NO	If NO, Auditor is to specify why criterion is not met
<b>1. Inspection Form Design</b>						
a) The jurisdiction's inspection form identifies foodborne illness risk factors and Food Code interventions.	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
b) The jurisdiction's inspection form documents actual observations using the convention IN, OUT, NA, and NO.	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
c) The jurisdiction's inspection form documents compliance and enforcement activities.	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
<b>2. Risk Assessment Categories</b>						
a) A risk assessment is used to group food establishments into at least 3 categories based on their potential and inherent food safety risks.	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
<b>3. Inspection Frequency</b>						
a) The jurisdiction's inspection frequency is based on the assigned risk categories.	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
<b>4. Written and Implement Corrective Action Policy</b>						
a) The jurisdiction has a written and implemented policy that requires on-site corrective action for foodborne illness risk factors observed to be out of compliance.	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
b) The jurisdiction has a written and implemented policy that requires discussion for long-term control of foodborne illness risk factors.	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	

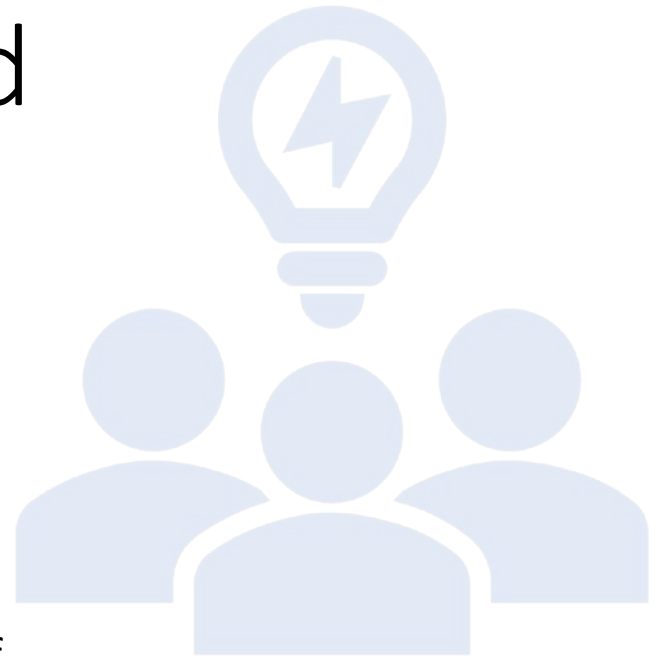


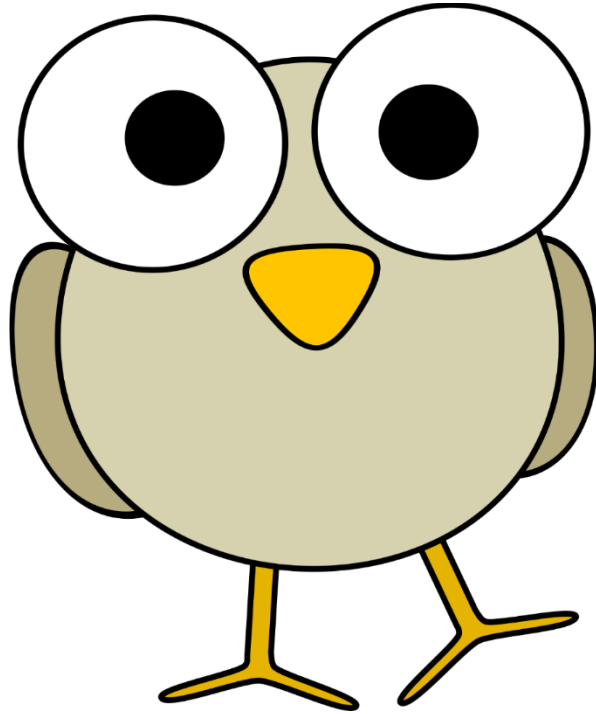


# Lessons Learned



1. Hardest part is to put your policies/procedures in writing.
2. Usually have to add a few to meet the requirement.
3. Policies and Procedures, especially when only verbal, may not all be interpreted the same way by all staff.
4. Expect to update them!





??



Jason Reagan

- Standard 6
- Gwinnett, Newton, and Rockdale County Health Departments

# Voluntary National Retail Food Regulatory Program: Standard 6

(COMPLIANCE & ENFORCEMENT)

**Jason Reagan, REHS, CP-FS**  
**District Environmental Health Director**



**455 Grayson Hwy, Ste. 600 | Lawrenceville, GA 30046 | [gnrhealth.com](http://gnrhealth.com)**

# Requirement Summary

- Compliance and enforcement activities result in follow-up actions for out-of-control risk factors and timely correction of code violations.

# Step-By Step Procedure

- When developing this standard several key documents will be needed:
  - Main Documentation
    - A written Compliance and Enforcement Procedure
    - Standard 6 Standard Operating Procedure
  - Supporting Documentation
    - Inspection report
    - On-site Corrective Action Procedures
    - Flow Charts
    - Randomizer
    - Establishment File Worksheet – Per Establishment Review
    - File Review Verification Audit Worksheet – Establishment Files
    - FDA National Registry Report
    - Self-Assessment & Verification Audit Form

# Main Documentation

## ❑ **A written Compliance and Enforcement Procedure**

This document addresses:

- Ensuring all Risk Factor violations are corrected on-site or during follow-up inspections.
- If Risk Factor violations are not corrected on-site or by food code deadlines then what would happen. Ex. Permit suspension.
- How long term compliance will be achieved for out of control Risk Factors.

# Main Documentation

## □ **Standard 6 Standard Operating Procedure**

This document addresses:

- Who will be conducting the assessment.
- The frequency of the Standard 6 assessment period.
- Step by step procedures on how the assessment is to be conducted.



# Supporting Documentation

## ❑ Inspection Report

This document addresses:

- Must capture that you corrected Risk Factor violations.
- Describe how you corrected the violations.

FOODBORNE ILLNESS RISK FACTORS AND PUBLIC HEALTH INTERVENTIONS										
IN=in compliance OUT=not in compliance NO=not observed NA=not applicable COS=corrected on-site during inspection R=Repeat violation of the same code prevision=2 points										
Compliance Status								COS	R	Prevision
1	IN	OUT	NA	NO	Supervision				4 points	
	<input type="radio"/>	<input type="radio"/>			1-2A PIC present, demonstrates knowledge, performs duties				<input checked="" type="radio"/>	<input type="radio"/>
	<input type="radio"/>	<input type="radio"/>			1-2B Certified Food Protection Manager				<input type="radio"/>	<input type="radio"/>
2	IN	OUT	NA	NO	Employee Health, Good Hygienic Practices, Preventing Contamination by Hands				9 points	
	<input type="radio"/>	<input type="radio"/>			2-1A Proper use of restriction and exclusion				<input type="radio"/>	<input type="radio"/>
5	IN	OUT	NA	NO	Cooking and Reheating of TCS Foods, Consumer Advisory				9 points	
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	5-1A Proper cooking time and temperature				<input type="radio"/>	<input type="radio"/>
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	5-1B Proper reheating procedures for hot holding				<input type="radio"/>	<input type="radio"/>
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	5-2 Consumer advisory provided for raw and				<input type="radio"/>	<input type="radio"/>

# Supporting Documentation

## □ On-Site Corrective Action Policy

This document addresses:

- Provides guidance on how inspectors are to correct violations on-site.

On-Site Corrective Action Procedures

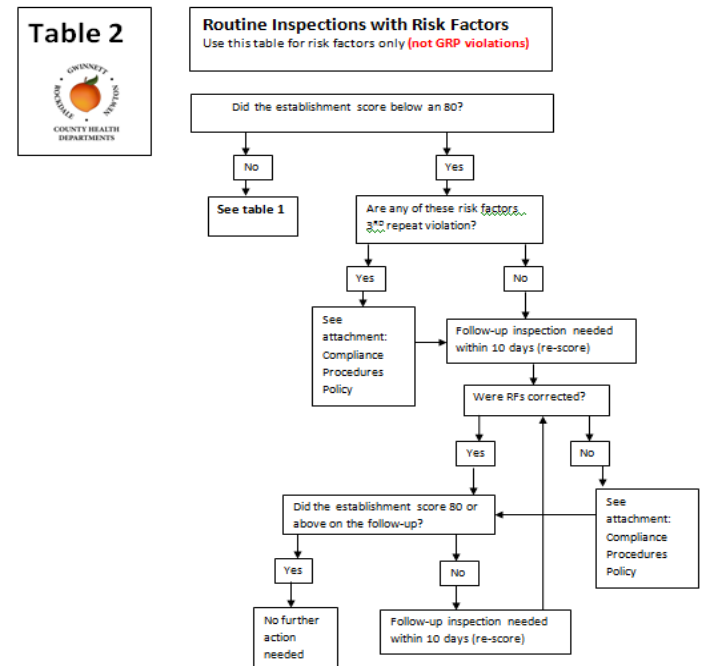
Code Provision	Item # on inspection form	Risk Factor	On-Site Corrective Action
290-5-14-.03(1)(a)-(c) 290-5-14-.03(2)	1-2	<b>Demonstration of knowledge</b> <ul style="list-style-type: none"> <li>• The person in charge shall demonstrate knowledge of foodborne disease prevention and application of Hazard Analysis Critical Control Point principles.</li> <li>• At least one employee shall be a Certified Food Safety Manager</li> </ul>	<ul style="list-style-type: none"> <li>• A person in charge who can demonstrate knowledge through questions or is certified arrives</li> <li>• Check on follow-up inspection</li> <li>• On-site education of risk factors</li> <li>• See flow charts for CFSM</li> </ul>
290-5-14-.03(4)(g)	2-1A	<b>Exclusions &amp; Restrictions</b> <ul style="list-style-type: none"> <li>• Food employee is symptomatic of illnesses, or has been diagnosed of an illness or has been exposed to a foodborne pathogen</li> </ul>	<ul style="list-style-type: none"> <li>• Restrict the food employee</li> <li>• Exclude the food employee</li> <li>• Suspend the permit</li> </ul>

# Supporting Documentation

## □ Flow Charts

This document addresses:

- Guidance on flow of inspections when obtaining corrective actions for Risk Factor violations.



# Supporting Documentation

## ☐ Randomizer

This document addresses:

- Use a randomizer program to randomly select the required number of facilities you need to evaluate for Standard 6.
- <https://www.randomizer.org/>

# Supporting Documentation

## **Establishment File Worksheet**

This document addresses:

- Form that records the inspection file review per facility for compliance with Standard 6.

# Supporting Documentation – Establishment File Worksheet

Gwinnett, Newton and Rockdale County Environmental Health Department Standard 6: Compliance and Enforcement Establishment File Worksheet										
Today's Date:				Establishment Name:						
File Number:				Permit Number:						
Randomly Selected Number:				Inspection Date (Start Point):						
Risk Factor and Food Code Interventions										
	Unsafe Source	Inadequate Cooking	Improper Holding Temperatures Hot & Cold	Time/Temperature Parameters not Met (Time as a Control, date marking, rapid cooling)	Bare Hand Contact with Ready-to-Eat Food	Poor Personal Hygiene	Contaminated Food Contact Surface & Equipment	Consumer Advisory (when required)	Demonstration of Knowledge by PIC	Employee Health Control system or policy implemented
Reference to local inspection items	3-1A	5-1A	6-1A,B	6-1C,D; 6-2	2-1C	2-1A,B; 2-2C	4-2B	5-2	1-2A	2-2A
Start Point Inspection Violations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was on-site corrective action taken?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was follow-up corrective action taken?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was enforcement action taken?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Note: Each column in which a violation is noted must receive a yes response to one of the three questions in order for the file to pass. Additionally, written procedures must have been followed.										
Acronym / Notation	Definitions				Acronym / Notation	Definitions				
COS	Corrected on site									
Select One:	File Meets Std 6 Criteria <input type="checkbox"/>				File Does Not Std 6 Criteria <input type="checkbox"/>					

# Supporting Documentation

## **File Review Verification Worksheet**

This document addresses:

- Form that records the overall inspection file review per facility for compliance with Standard 6.

# Supporting Documentation – File Review Verification Worksheet

## Standard 6: Compliance and Enforcement Verification Audit Worksheet Establishment Files

Jurisdiction Name:

Number of Files Selected	Randomly Selected Number	Name or ID of Establishment	Yes	No	Does Not Qualify	IF NO, Auditor is to specify why the establishment file does not meet all the elements contained in the jurisdiction's written compliance and enforcement procedures
1	2653	067-FS-8738 Yany Express	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2	2433	067-FS-11270 Tim Lizzys	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	1628	067-7671 Natarica Grill Restaurant	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4	225	067-FS-10978 Bojangles	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5	761	067-2267 El Toreo Mexican Restaurant	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6	2001	067-FS-9745 Smellville Oaks 14 Theatre	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7	2163	067-FS-10024 Subway	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8	1209	067-FS-8403 Joe's Crab Shack	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9	2044	067-FS-9157 Sky BBA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10	348	067-FS-11438 Cafe Blue	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Follow-up was completed within 14 days. First inspection conducted on site



# Supporting Documentation

- FDA National Registry Report**
- Self-Assessment & Verification Audit Form**

These documents address:

- Letting FDA know that you have had Standard 6 audited and approved.
- Provides audit information and notes.

# Lessons Learned

1. It's okay to utilize other jurisdictions documentation when creating procedures for this Standard (with their permission).
2. We were marking Risk Factor violations as corrected on-site but not always stating how we corrected the violations on the report.
3. Need to have periodic trainings with staff on how to handle getting violations corrected on-site and proper documentation.
4. Standard 6 helped us formalize all the procedures we “thought” we were doing so our inspection staff is clear on expectations.

# Q&A Session





Thank you for your participation in today's sharing session!

For more information about NACCHO's Food Safety Program, contact:

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**NACCHO Food Safety Webpage:**

<http://www.naccho.org/programs/environmental-health/hazards/food-safety>

**Retail Program Standard Blog Series:**

<http://essentialelements.naccho.org/?s=retail+program+standards+blog+series&submit=Search>