



Franklin Regional Council of Governments

Franklin County Cooperative Public Health Service

CPHS Formal Policy for a Uniform Food Inspection Program

Adopted by the Boards of Health in Buckland, Charlemont, Gill, Hawley, Heath, Leyden, Monroe and Rowe

Revisions approved by Oversight Board 4/23/18

I. PURPOSE

(1) This policy is adopted pursuant to the general authority of the Board of Health to enforce the State and Federal Food Codes as provided by 105 CMR 590.000

(2) The purpose of this policy is to provide for the protection of public health by establishing a formal management program that includes a quality assurance program (QAP) to ensure uniformity among regulatory staff in the interpretation and application of laws, regulations, policies, and procedures.

(3) Underlying this policy framework is acceptance and adherence to the Food Protection Regulations promulgated by the MA Department of Public Health Food Protection Program, including any guidance associated with such regulations. Also included and adopted are the related Department of Environmental Protection regulations governing Public Water Supplies (310 CMR 22.00), the Title 5 sewage treatment regulations (310 CMR 15.000) including associated guidance, and any relevant local BOH regulations.

II. POLICY

The following policy is based on the Voluntary National Retail Food Regulatory Program Standards - January 2017 - Standard 4, Uniform Inspection Program.

<https://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/ProgramStandards/ucm245409.htm>

This standard applies to the jurisdiction's internal policies and procedures established to ensure uniformity among regulatory staff in the interpretation of regulatory requirements, program policies and compliance and enforcement procedures.

1. Program Management implements an on-going quality assurance program (QAP) that evaluates inspection uniformity to ensure inspection quality, inspection frequency and uniformity among the regulatory staff. The quality assurance program shall:
 - A. The QAP shall assure that each food inspector:
 1. Has required equipment and forms to properly conduct the inspection.
 2. Reviews the contents of the establishment file, including the previous inspection report, reported complaints on file, and, if applicable, required HACCP Plans or documents supporting the issuance of a variance.
 3. Verifies that the establishment is in the proper risk category and that the required inspection frequency is being met. Informs the supervisor when the establishment is not in the proper risk category or when the required frequency is not met.
 4. Provides identification as a regulatory official to the person in charge and states the purpose of the visit.

5. Interprets and applies the jurisdiction's laws, rules, policies, procedures, and regulations required for conducting retail food establishment inspections.
 6. Uses a risk-based inspection methodology to conduct the inspection.
 7. Accurately determines the compliance status of each risk factor and Food Code intervention (i.e., IN compliance, OUT of compliance, Not Observed, or Not Applicable).
 8. Obtains corrective action for out-of-compliance risk factors and Food Code interventions in accordance with the jurisdiction's policies.
 9. Discuss options for the long-term control of risk factors with establishment managers, when the same out-of-control risk factor occurs on consecutive inspections, in accordance with the jurisdiction's policies. Options may include, but are not limited to; risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP plans.
 10. Verifies correction of out-of-compliance observations identified during the previous inspection. In addition, follows through with compliance and enforcement in accordance with the jurisdiction's policies.
 11. Conducts an exit interview that explains the out-of-compliance observations, corrective actions, and timeframes for correction, in accordance with the jurisdiction's policies.
 12. Provides the inspection report and, when necessary, cross-referenced documents, to the person in charge or permit holder, in accordance with the jurisdiction's policies.
 13. Demonstrates proper sanitary practices as expected from a food service employee.
 14. Completes the inspection form per the jurisdiction's policies (i.e. observations, public health reasons, applicable code reference, compliance dates).
 15. Documents the compliance status of each risk factor and intervention (IN, OUT, NA, NO) for all inspections.
 16. Cites the proper code provisions for risk factors and Food Code interventions, in accordance with the jurisdiction's policies.
 17. Documents corrective action for out-of-compliance risk factors and Food Code interventions in accordance with the jurisdiction's policies.
 18. Documents that options for the long-term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurs on consecutive inspections. Options may include, but are not limited to, risk control plans, standard operating procedures, equipment and/or facility modification, menu modification, buyer specifications, remedial training, or HACCP Plans.
 19. Compliance or regulatory documents (i.e. exhibits, attachments, sample forms) are accurately completed, appropriately cross-referenced within the inspection report, and included with the inspection report, in accordance with the jurisdiction's policies.
 20. Files reports and other documentation in a timely manner, in accordance with the jurisdiction's policies.
2. The QAP must achieve an overall inspection program performance rating for each of the twenty measured elements [Items 1-20] of at least 75% using the self-assessment procedure and the appropriate table provided in the *VNRFRRPS Standard 4: Self-Assessment Instructions and Worksheet*.

An assessment review of each inspector's work shall be made during at least three joint on-site inspections, with a corresponding file review of at least the three most recent inspection reports of the same inspected establishments, during every self-assessment period.

III. DOCUMENTATION

The recordkeeping for this policy must provide sufficient capacity to ensure adherence to the QAP. Documentation must be maintained in an accessible format available for audit and shall include specific corrective actions taken to address deficiencies, and; allow analysis that confirms that the program achieves 75% performance rating for each element described above in elements 1-20.