Conference for Food Protection
2012 Issue Form

Internal Number: 003
Issue: 2012 II-036

Council Recommendation:	Accepted as Submitted	_____	Accepted as Amended	_____	No Action	_____
Delegate Action:	Accepted	_____	Rejected	_____		

All information above the line is for conference use only.

Title:
Risk-Based Inspection Form-Marking

Issue you would like the Conference to consider:
REMOVE THE RESTRICTION FROM THE AUDIT MANUAL THAT THE FORM NOT BE PRE-POPULATED WITH ITEMS MARKED "IN"

Public Health Significance:
THE RECOMMENDED RISK-BASED INSPECTION FORM CONTAINS "IN/ OUT / NA / AND NO" CATEGORIES FOR 54 GROUPS OF VIOLATIONS. USE OF THIS FORM IS NECESSARY TO MEET AT LEAST 3 SEPARATE Retail Food Regulatory Program STANDARDS. REQUIRING EACH OF THE 54 GROUPS TO EACH BE MARKED EVERY INSPECTION IS REQUIRED TO ELIMINATE ALLEGED POTENTIAL BIAS THAT MAY BE PRESENT IF THE FORM IS PRE-POPULATED WITH ITEMS MARKED "IN".
REASONS THIS REQUIREMENT SHOULD BE ELIMINATED INCLUDE:

- THERE IS NO STATISTICALLY VALID RESEARCH THAT SHOWS SUCH BIAS WOULD OCCUR. FORCING INDIVIDUALS TO ROUTINELY MARK 50+ ITEMS ON A FORM EACH INSPECTION WOULD JUST AS LIKELY PROMOTE "DRY LAB" BEHAVIOR TO JUST GET THROUGH THE FORM AND INCREASE GENERAL HUMAN ERROR. LETTING PROFESSIONALS JUST MARK THE ITEMS THAT HAVE MEANING FOR THAT INSPECTION (OUT,NA/NO) WOULD BE FAR MORE MEANINGFUL.
- THE CONSISTENT APPROACH OF CFP HAS BEEN TO STATE OUTCOMES, NOT TO PRESCRIBE SPECIFIC SOLUTIONS. THIS ALLOWS INDUSTRY TO USE AN IMPLEMENTATION SYSTEM THAT MEETS THEIR NEEDS AND FLEX THAT SYSTEM TO UTILIZE CURRENT TECHNOLOGY AND TRAINING METHODS. THAT SAME PHILOSOPHY SHOULD BE USED FOR THE REGULATORY AGENCIES. QUALITY CONTROL SYSTEM SPECIFICS OVER THE INSPECTION WRITING PROCESS SHOULD BE DETERMINED BY EACH AGENCY. FOR EXAMPLE, WITH THE INSPECTION FORM, QUALITY CONTROL CAN BE MAINTAINED THROUGH INITIAL AND ONGOING TRAINING WITH A STANDARDIZED TRAINER, SUPERVISORY REVIEW, REPORTS OF MARKING PATTERNS USED BY STAFF IF THE FORM IS MAINTAINED IN AN ELECTRONIC DATABASE, ETC.

- RESOURCE STRAPPED STATE AND LOCAL AGENCIES CANNOT AFFORD THE EXTRA TIME NEEDED TO ROUTINELY MARK "IN" ON A FORM OVER 50 TIMES PER INSPECTION. FOR EXAMPLE AT AN EXTRA 5 MINUTES PER INSPECTION TO MARK EACH OF THE ITEMS "IN", USE OF THIS FORM STATEWIDE IN MICHIGAN WOULD CAUSE A 5.4 FTE STAFF REDUCTION IN TIME (101,682 INSPECTIONS X 5 MINUTES= 508,410 MINUTES/60=8474 HOURS/1550 HOURS/FTE=5.4 FTE'S). THIS REPRESENTS A 2.2% REDUCTION IN STAFFING STATEWIDE.
- INFLEXIBLE, COMMAND AND CONTROL REQUIREMENTS SUCH AS THIS WILL BE A DETERRENT TO AGENCIES ENROLLING AND OR WORKING TO PROGRESS TO MEET THE STANDARDS.

Recommended Solution: The Conference recommends...:
that a letter be sent to the FDA requesting removal of the Audit Manual restriction that the risk-based retail inspections form fields not be pre-populated as "in."

Submitter Information:

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Attachments:
- "Michigan's form-fillable retail risk-based form"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.

FI-237 (Rev 7-09)

Michigan Food Establishment Evaluation Report

Page _____ of _____

Agency Name	Agency Address

Establishment Name	Address	City	License #

Person in Charge	Inspection Type	Risk Category
	Routine	X

FOODBORNE ILLNESS RISK FACTORS AND PUBLIC HEALTH INTERVENTIONS

Check (√) designated compliance status (IN, OUT, NO, NA) for each numbered item

IN=in compliance **OUT**=not in compliance **NO**=not observed **NA**=not applicable

Mark "X" in appropriate box for COS and/or R

COS=corrected on-site during inspection **R**=repeat violation

Compliance Status						COS	R
	IN	OUT	NA	NO			
Demonstration of Knowledge							
1	✔				Person in charge present, demonstrates knowledge, and performs duties		
Employee Health							
2	✔				Management awareness; policy present		
3	✔				Proper use of reporting, restriction & exclusion		
Good Hygienic Practices							
4	✔				Proper eating, tasting, drinking, or tobacco use		
5	✔				No discharge from eyes, nose, and mouth		
Preventing Contamination by Hands							
6	✔				Hands clean & properly washed		
7	✔				No bare hand contact with RTE foods or approved alternate method properly followed		
8	✔				Adequate handwashing facilities supplied & accessible		
Approved Source							
9	✔				Food obtained from approved source		
10	✔				Food received at proper temperature		
11	✔				Food in good condition, safe, & unadulterated		
12	✔				Required records available: shellstock tags, parasite destruction		
Protection from Contamination							
13	✔				Food separated & protected		
14	✔				Food-contact surfaces: cleaned & sanitized		
15	✔				Proper disposition of returned, previously served, reconditioned, & unsafe food		

Compliance Status						COS	R
	IN	OUT	NA	NO			
Potentially Hazardous Food Time/Temperature							
16	✔				Proper cooking time & temperatures		
17	✔				Proper reheating procedures for hot holding		
18	✔				Proper cooling time & temperatures		
19	✔				Proper hot holding temperatures		
20	✔				Proper cold holding temperatures		
21	✔				Proper date marking & disposition		
22	✔				Time as a public health control: procedures & record		
Consumer Advisory							
23	✔				Consumer advisory provided for raw or undercooked foods		
Highly Susceptible Populations							
24	✔				Pasteurized foods used; prohibited foods not offered		
Chemical							
25	✔				Food additives: approved & properly used		
26	✔				Toxic substances properly identified, stored, & used		
Conformance with Approved Procedures							
27	✔				Compliance with variance, specialized process, & HACCP plan		

Risk factors are improper practices or procedures identified as the most common contributing factors of foodborne illness or injury. Public Health Interventions are control measures to prevent foodborne illness or injury.

GOOD RETAIL PRACTICES

Good Retail Practices are preventative measures to control the addition of pathogens, chemicals, and physical objects into foods.

Compliance Status						COS	R
	IN	OUT	NA	NO			
Safe Food and Water							
28	✔				Pasteurized eggs used where required		
29	✔				Water & ice from approved source		
30	✔				Variance obtained for specialized processing method		
Food Temperature Control							
31	✔				Proper cooling methods used Adequate equipment for temperature control		
32	✔				Plant food properly cooked for hot holding		
33	✔				Approved thawing methods used		
34	✔				Thermometers provided & accurate		
Food Identification							
35	✔				Food properly labeled; original container		
Prevention of Food Contamination							
36	✔				Insects, rodents, animals absent		
37	✔				Contam. prevented during food prep., storage, display		
38	✔				Personal cleanliness		
39	✔				Wiping cloths: properly used & stored		
40	✔				Washing fruits & vegetables		

Compliance Status						COS	R
	IN	OUT	NA	NO			
Proper Use of Utensils							
41	✔				In-use utensils properly stored		
42	✔				Utensils, equip. & linens: stored, dried, handled		
43	✔				Single-use & single-serve articles: stored & used		
44	✔				Gloves properly used		
Utensils, Equipment and Vending							
45	✔				Food & non-food contact surfaces cleanable, properly designed, constructed & used		
46	✔				Warewashing- installed, maintained & used; test strips		
47	✔				Non-food contact surfaces clean		
Physical Facilities							
48	✔				Hot & cold water available, adequate pressure		
49	✔				Plumbing installed; proper backflow devices		
50	✔				Sewage & waste water properly disposed		
51	✔				Toilet facilities: constructed, supplied, clean		
52	✔				Garbage/refuse properly disposed; fac. maintained		
53	✔				Physical facilities installed, maintained & clean		
54	✔				Adeq. ventilation & lighting; designated areas used		

Person in Charge (Signature)	Inspector (Signature)	Date

As required by Act 92, Public Acts of 2000, as amended