

**Conference for Food Protection
2016 Issue Form**

Issue: 2016 II-011

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

All information above the line is for conference use only.

Issue History:

This is a brand new Issue.

Title:

Amend VNRFRPS – Standard 4 – Uniform Inspection Program (Part 1)

Issue you would like the Conference to consider:

Amend Voluntary National Retail Food Regulatory Program Standard (VNRFRPS) No. 4 to reflect recommendations from the 2012 CFP Uniform Inspection Program Audit Pilot Project Report.

The Pilot Project Report is available with this Issue as a supporting attachment; it is also currently posted on the CFP website at:

<http://www.foodprotect.org/media/guide/uniform-inspection-program-audit-pilot-project-report.pdf>

Public Health Significance:

The 2012 CFP Uniform Inspection Audit Pilot Project Report evaluated the Uniform Inspection Program process and audit worksheet as tools for conducting the quality assurance evaluations in Program Standard No. 4.

Implementing the following changes will address some of the recommendations provided in the Pilot Project Report, while also providing greater flexibility, improved program quality assessment, and greater consistency between Program Standard No. 2 and No. 4:

1. More closely align the ten Program Elements described in Program Standard No. 4 with the Performance Elements and Competencies contained in the Standard No. 2 - CFP Field Training Plan for new hires or staff newly assigned to the retail food protection program.
2. Provide a re-ordered listing of the Program Elements in Program Standard No. 4 to reflect the organized flow of the inspection process.
3. Increase the minimum number of required field assessments (joint inspections) to maintain consistency with the current statistical model upon which Standard 4 is based; this calculation is shown in "Attachment C - Update: Explanation of the Statistical Model for Program Standard No. 4."

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting that the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS), Program Standard No. 4 - Uniform Inspection Program, be amended to reflect the changes shown in "Attachment A - Proposed Amendments to Program Standard No. 4 - Uniform Inspection Program" (language to be added is underlined; language to be deleted is in strikethrough format).

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Content Documents:

- "Attachment A- Program Standard No. 4 - Uniform Inspection Program"

Supporting Attachments:

- "Attachment B-Explanation of the Statistical Model for Program Standard No.4"
- "Attachment C-Updated Explanation of the Statistical Model for Prog. Std. 4"
- "Attachment D- Uniform Inspection Program - Audit Pilot Project Report"

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.

**STANDARD 4
UNIFORM INSPECTION PROGRAM**

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STANDARD 4 UNIFORM INSPECTION PROGRAM

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 / enforcement procedures.

Requirement Summary

Program management has established a quality assurance program to ensure uniformity among regulatory staff in the interpretation and application of laws, regulations, policies, and procedures.

Description of Requirement

1) Program Management implements an on-going quality assurance program that evaluates inspection uniformity to ensure inspection quality, inspection frequency and uniformity among the regulatory staff. ~~The quality assurance program shall:~~

~~A. Be an on going program.~~

~~B. A. The quality assurance program shall assure that each inspector:~~

- ~~1. Determines and documents the compliance status of each risk factor and intervention (i.e., IN compliance, OUT of compliance, Not Observed, or Not Applicable is noted on the inspection form) through observation and investigation;~~
- ~~2. Completes an inspection report that is clear, legible, concise, and accurately records findings, observations and discussions with establishment management;~~
- ~~3. Interprets and applies laws, regulations, policies and procedures correctly;~~
- ~~4. Cites the proper local code provisions for CDC identified risk factors and Food Code interventions;~~
- ~~5. Reviews past inspection findings and acts on repeated or unresolved violations;~~
- ~~6. Follows through with compliance and enforcement;~~
- ~~7. Obtains and documents on-site corrective action for out-of-control risk factors at the time of inspection as appropriate to the type of violation;~~
- ~~8. Documents that options for the long-term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurred 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;~~
- ~~9. Verifies that the establishment is in the proper risk category and that the required inspection frequency is being met; and~~
- ~~10. Files reports and other documentation in a timely manner.~~
1. Has required equipment and forms to 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.

Attachment A – Proposed Amendments to Program Standard No. 4 – Uniform Inspection Program

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. Discusses 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).
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 time manner, in accordance with the

Attachment A – Proposed Amendments to Program Standard No. 4 – Uniform Inspection Program

jurisdiction's policies.

~~C. B. The Quality Assurance Program shall~~ Describe the actions that will be implemented when the program analysis identifies deficiencies in quality or consistency in any program ~~aspect~~element listed above in 1)-~~B~~(A).

2) The quality assurance program must achieve an overall inspection program performance rating for each of the ~~ten~~twenty measured ~~aspects~~elements [Items ~~1-10~~1-20] of at least 75% using the ~~following~~ self-assessment procedure and the appropriate ~~Table~~table provided in the *Standard 4: Self-Assessment Instructions and Worksheet*.

An assessment review of each inspector's work shall be made during at least ~~two~~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.

[*NOTE: *Staff members who are within their initial 18 months of training and have not completed all prerequisite courses, 25 joint inspections and 25 independent inspections as required in Standard 2, are exempt from the joint on-site inspections and file reviews used in the performance measurement rating calculation in the Standard 4 Self-Assessment Worksheet.*]

Outcome

A quality assurance program exists that ensures uniform, high quality inspections.

Documentation

The quality records needed for this standard include:

1. A written procedure that describes the jurisdiction's quality assurance program that meets the criteria under the Description of Requirement section 1)-~~B~~(A)-, including corrective actions for deficiencies, and
2. Documentation that the program achieves a 75 percent performance rating on each ~~aspect~~element using the self-assessment procedures described above.

EXPLANATION OF THE STATISTICAL MODEL for STANDARD 4

This is an explanation of the thinking that determined the statistical model relating to the criteria used for evaluating the inspectional performance of jurisdictions.

Evaluation of the performance of large jurisdictions

For large jurisdictions (jurisdictions with 10 or more inspectors), the evaluation is based on direct oversight of two inspections per inspector, with respect to 10 items of performance. If 10 or more inspectors are being evaluated in the program, then we will see 20 or more scores of satisfactory or unsatisfactory for each item. The standard for approval of the inspection performance is a passing score of 75% on each of the 10 items. An individual item receives a passing score if at least 75 percent of the instances of observation are completed in a satisfactory manner. For example, with 10 inspectors, we must have at least 15 (that is 75 percent of 20 inspections) completed correctly for item number 1. Similarly, for item number 2, we would need to see at least 15 inspections done correctly. In order for the program to pass the evaluation successfully with respect to inspection performance, all of the 10 items would be required to show satisfactory completion of at least 15 out of the 20 ratings. For those jurisdictions with more than 10 inspectors, we simply apply the 75 percent rule as we did for the jurisdiction with 10 inspectors. Using two overseen inspections for each inspector, record the observations for each item, figure the percent correct for each item, and round up to the next higher whole number when the percent is not a whole number.

The 75 percent per item rule was determined by the consensus of several highly experienced individuals working in the retail food safety team. We view the set of overseen inspections as a sample from a much larger set of total inspections performed. In this approach to program evaluation, the statistical measure does not evaluate any individual inspector. The emphasis is on the overall performance of the team, with respect to any item. Even if an inspection is observed in which one inspector fails all 10 items, the program would not necessarily fail.

The jurisdiction's quality assurance program, however, must address individual inspector's performance to ensure a standard of uniformity among the team. If each inspection were successful only 75 percent of the time for each item, the team as a whole would almost always fail. This is because they would almost always dip below 75 percent on at least one of the 10 items. For example, a team that scored 70, 70, 70, 75, 75, 75, 80, 80, and 80 on each of the 10 items would be successful 75 percent of the time, but they would fail three times over since three items scored below 75. However, for a team with 10 inspectors exactly, if their chance of getting each item right improved to 88 percent at each inspection, then they would have a much better chance of keeping all 10 results at 75 percent or higher. Under the simple statistical assumption of independent sampling, a team achieving 88 percent at each inspection would pass the evaluation 75 percent of the time. Therefore, this 88 percent level of performance was used as a simple representation of a team that is good enough that we want them to have a

good chance of passing, but not so good that they would not find it advantageous to improve.

Evaluation of performance of small jurisdictions

A statistical issue was to determine a reasonable standard for those jurisdictions with less than 10 inspectors. When the sample gets this small, the relative error in the estimated fractions gets so large that the “each of 10 items rule” will fail good programs too frequently. Therefore, the 88 percent level of performance at each inspection was the feature of the standard that was kept constant in designing the sample sizes for the smaller jurisdictions

In jurisdictions with less than 10 inspectors, the statistical solution is to group all of the individual ratings, disregarding the individual items. For 5 inspectors we would review $5 \times 2 = 10$ inspections, with respect to all 10 items combined. This gives 100 observations. It is not possible to make a total observation test mimic exactly a 10 item test, but the minimum passing rates will be about as stringent as the 75 percent for each of 10 aspects test:

For 4 to 9 inspectors, conduct two joint inspections for each inspector. Chart 4-1 shows the lowest total passing score out of the complete set of combined items that would give at least a 75 percent chance of passing for a team with an 88 percent chance of getting any particular observation correct. For a team of three or less, it is recommended that extra oversight inspections be performed to produce a total of 8 inspections. This is an intuitive judgment call that any set smaller than 8 could randomly turn out to be odd enough to produce an unfair rating.

Chart 4-1
Method of Calculation for Jurisdictions with Less Than Ten Inspectors

# of inspectors	# inspections needed	# of items needed to be marked IN compliance in order to meet Standard 4 criteria
<4	8minimum	65 (out of 80 possible Items)
4-9	2 per inspector	4 inspectors = 65 (out of 80 possible Items) 5 inspectors = 82 (out of 100 possible Items) 6 inspectors = 99 (out of 120 possible Items) 7 inspectors = 116 (out of 140 possible Items) 8 inspectors = 133 (out of 160 possible Items) 9 inspectors = 150 (out of 180 possible Items)

Update: EXPLANATION OF THE STATISTICAL MODEL for STANDARD 4

There is a proposal to change the number of performance elements used in Standard 4, resulting in the need to update the statistical model. Previously, in large jurisdictions (jurisdictions with 10 or more inspectors), the evaluation was based on direct oversight of two inspections per inspector, with respect to 10 performance elements. However, the proposal contains 20 performance elements instead of 10.

Using the previous statistical model and assumptions, a team achieving 88 percent at each inspection would pass the evaluation 75 percent of the time. Therefore, this 88 percent level of performance was used as a simple representation of a team that is good enough that we want them to have a good chance of passing, but not so good that they would not find it advantageous to improve. But now with 20 items instead of 10, a jurisdiction with 88 percent level of performance would pass only 59 percent of the time. This would fail too many high performing jurisdictions.

In order to rectify this, for large jurisdictions (jurisdictions with 10 or more inspectors), the evaluation must now be based on direct oversight of three inspections per inspector, with respect to 20 performance elements. With the additional inspections evaluated, the 88 percent performing jurisdiction will pass 75% of the time.

Evaluation of performance of small jurisdictions

A statistical issue was to determine a reasonable standard for those jurisdictions with less than 10 inspectors. When the sample gets this small, the relative error in the estimated fractions gets so large that the “each of 20 items rule” will fail good programs too frequently. Therefore, the 88 percent level of performance at each inspection was the feature of the standard that was kept constant in designing the sample sizes for the smaller jurisdictions

In jurisdictions with less than 10 inspectors, the statistical solution is to group all of the individual ratings, disregarding the individual items. For 5 inspectors we would review $5 \times 3 = 15$ inspections, with respect to all 20 items combined. This gives 300 observations. It is not possible to make a total observation test mimic exactly a 20 item test, but the minimum passing rates will be about as stringent as the 75 percent for the 20 item test:

For 4 to 9 inspectors, conduct three joint inspections for each inspector. Chart 4-1 shows the lowest total passing score out of the complete set of combined items that would give at least a 75 percent chance of passing for a team with an 88 percent chance of getting any particular observation correct. For a team of three or less, it is recommended that extra oversight inspections be performed to produce a total of 12 inspections. This is an intuitive judgment call that any set smaller than 12 could randomly turn out to be odd enough to produce an unfair rating.

**Standard 4: Uniform Inspection
Program
Self-Assessment
Worksheet**

Chart 4-1: Method of Calculation for Jurisdictions with Less Than Ten Inspectors

# of inspectors	# inspections needed	# of items needed to be marked IN compliance in order to meet Standard 4 criteria
<4	12 minimum	200 (out of 240 possible Items)
4-9	3 per inspector	4 inspectors = 200 (out of 240 possible Items) 5 inspectors = 252 (out of 300 possible Items) 6 inspectors = 303 (out of 360 possible Items) 7 inspectors = 355 (out of 420 possible Items) 8 inspectors = 407 (out of 480 possible Items) 9 inspectors = 459 (out of 540 possible Items)

NOTE:

1. These minimum inspection program assessment criteria are comparable to the 75% IN Compliance rate for each of the ten inspection program areas for jurisdictions with 10 or more inspectors.

Example:

*For 6 inspectors, there will be 3 field visits per inspector = 18 visits
18 visits X 20 Items per visit= 360 Total Possible Items*

CONFERENCE FOR FOOD PROTECTION

CERTIFICATION OF
FOOD SAFETY REGULATION PROFESSIONALS
WORK GROUP

UNIFORM INSPECTION PROGRAM
AUDIT PILOT PROJECT REPORT

December 1, 2011

Uniform Inspection Program Audit Pilot Project Report

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Uniform Inspection Program Audit Pilot Project Report

Uniform Inspection Program Audit Pilot Project Report

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Uniform Inspection Program Audit Pilot Project Report

Executive Summary

The Certification of Food Safety Regulatory Profession (CFSRP) Work Group, originating with the 2004 Conference for Food Protection (CFP), has been working with representatives of the Food and Drug Administration to create a multi-tiered process for training and standardizing Food Safety Inspection Officers (FSIOs). The goal of this initiative is to develop a nationally recognized training and standardization process for FSIOs that can be used as a model by retail food regulatory programs to enhance the effectiveness of food establishment inspections and increase uniformity among regulatory professionals in their assessment of food safety practices in the retail food industry.

Over the past 5 years, the CFP CFSRP Work Group has used the criteria contained in the *FDA Voluntary National Retail Food Regulatory Program Standards (FDA Program Standards)*, Standard 2 – Trained Regulatory Staff to develop a comprehensive training model for regulatory retail Food Safety Inspection Officers. Jurisdictions using the CFP field training process and forms have indicated an overwhelmingly favorable experience.

Results from the follow-up interviews with jurisdictions using the Standard 2 criteria to train their retail food inspection staff indicated support for the development of an audit tool that mirrored the CFP field training process. The 2010 Conference charged the CFSRP Work Group with coordinating a pilot project to assess the appropriateness of using a customized version of the FDA Retail Food Level I Performance Audit process and forms with a limited number of jurisdictions enrolled in the *FDA Voluntary National Retail Food Regulatory Program Standards*.

The primary objective of the pilot project was to evaluate the *Uniform Inspection Program Audit* process and *Audit Worksheet* as tools for conducting the quality assurance evaluations included as part of Standard 4 – Uniform Inspection Program criteria. The Standard 4 criteria requires an assessment of each inspector's work during at least two joint on-site inspections, with a corresponding file review of at least the three most recent inspection reports of the same inspected establishment. A model template for conducting this type of field assessment is not currently provided in Standard 4. One of the intended outcomes of the pilot project was to assess the feasibility for incorporating the *Uniform Inspection Program Audit* process and *Audit Worksheet* as model template contained in an Appendix to Standard 4.

A pilot application of the *Uniform Inspection Program Audit* process and *Audit Worksheet* was conducted by 14 retail food regulatory programs between July, 2010 and June, 2011. The type and number of jurisdictions that participated in the pilot project are: State (6), County (7), and City (1). The population living in the pilot jurisdictions ranged from 50,000 to more than 500,000. The total number of retail food and foodservice establishments under permit in the pilot jurisdictions ranged from 101 to over 6,000. The pilot jurisdictions were selected from regulatory agencies enrolled in the *FDA Voluntary National Retail Food Regulatory Program Standards* that had reported meeting the training requirements described in Steps 1 through 3 of Standard 2 – Trained Regulatory Staff.

A total of 76 FSIOs were assessed using the quality assurance inspection program criteria contained in Standard 4. A total of 42 FSIOs successfully performed all 10 Program Elements during the audit process. Seventy-one percent (71%) indicated that the uniform inspection program audit process is designed to facilitate a strengths-weaknesses assessment of a regulatory jurisdiction's retail food inspection program

Uniform Inspection Program Audit Pilot Project Report

More than seventy-eight percent (78.6%) of the pilot participants agreed that the Uniform Inspection Program audit process was a valuable use of their jurisdiction's resources. Most respondents were complimentary to the process and identified it as a "good start." These same respondents, however, submitted several recommendations for enhancing the effectiveness of the audit process and audit worksheet. Some of the recommendations were specific to re-evaluating the 10 Program Elements described in Standard 4 criteria.

Key recommendations for enhancing the effectiveness of the Standard 4 include, but are not limited to:

- Aligning the 10 Program Elements described in Standard 4 with the Performance Elements and Competencies contained in the Standard 2 – *CFP Field Training Plan* for new hires or staff newly assigned to the retail food protection program.
- Providing a linear listing of the Program Elements in Standard 4 to reflect an organized flow to the inspection process.
- Providing an assessment system that differentiates between the complexity and importance of the 10 Program Elements, particularly as they are assessed during the inspection review process.
- Clarifying the Standard 4 criteria as to what qualifications an individual charged with assessing the performance of field staff should have and what type of establishments should be selected for the file and field review.
- Re-evaluating the system currently in place for determining compliance with the Standard 4 criteria. The Standards are intended to apply to the operation and management of regulatory retail food programs NOT as assessments of practitioners in the field. The current system weighted on a practitioner's ability to demonstrate the 10 Program Elements during field inspections seems to be skewed more toward an assessment of the individual rather than an evaluation of the regulatory retail food inspection program.

The CFP CFSRP Work Group has prepared two issues related to the Uniform Inspection Program Audit Pilot Project for deliberation at the April 2012 Conference for Food Protection (CFP) in Indianapolis, IN. The issues include a recommendation for the Conference to send a letter to FDA requesting review of the recommendations outlined in this pilot project report including potential revisions to the Standard 4 criteria. The FDA review process is to illicit input and feedback from the CFP Program Standards Committee.

Uniform Inspection Program Audit Pilot Project Report

Introduction

Pilot Project

A pilot program began during the biennial CFP Conference in April 2010 when jurisdictions at all levels were solicited for their participation. During the conference, a fact sheet was distributed to prospective participants with basic information regarding the project. A gap analysis was conducted of the interested jurisdictions to determine if additional solicitation was needed to attain a demographically representative sample to reflect a national composition of regulatory retail food protection programs. In May of 2010, participant jurisdictions were selected and pilot project information packages were distributed.

In June of 2010, conference calls were held with the selected jurisdictions to provide them an overview of project objectives and information regarding the goals, methodology, data collection, and other pertinent issues. The pilot project was then launched in the summer of 2010 with a total enrollment of 14 State and Local jurisdictions. Additional conference calls were held as needed throughout the project and participating jurisdictions were able to correspond as needed with the Project Managers (Ms. Lee Cornman, Ms. Susan Kendrick, and Mr. John Marcello) for answers to their questions and problem resolution.

The pilot project was completed in July 2011 and this report represents the results.

Uniform Inspection Program Audit Pilot Project – Jurisdiction Feedback Form

To facilitate data collection on the project results and use of the Audit Worksheet, a survey instrument was designed for completion by the participant jurisdictions. The survey instrument titled, *Jurisdictions Feedback of the Audit Process and Forms*, (included as Appendix A), was designed to provide a structured process for collecting and analyzing feedback on the project. Results were then tabulated using statistical scoring software and narrative comments were tabulated and analyzed by Committee members.

For purposes of this report, the project results are presented in the same format as the actual Audit Process Feedback Form with each question appearing first followed by the tabulated results depicted in bold and within parenthesis after each response variable. Additionally, a summary of the analysis of the results is provided with tables and graphics where appropriate.

Pilot Project Objectives

The primary objectives of the pilot project focused on an assessment of the Uniform Inspection Program Audit Worksheet (included with this pilot project package) as a tool for the quality assurance evaluations conducted as part of Standard 4. Companion documents that included instructions and formats for using the Uniform Inspection Audit Worksheet were also included with this pilot project package.

Pilot project participants:

- Determined the strengths and weakness of the Uniform Inspection Audit Worksheet; instructions; and guidance documents.

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- Provided feedback on the ease of use of the documents, including the instructions and format. Were jurisdictions able to use the documents independently without direct supervision or oversight?
- Determined the length of time required to use the documents and complete the audit process.
- Determined whether the audit process is an appropriate to assess the FSIO's knowledge, skills and ability when applying the competencies required during a field inspection.
- Reviewed the 10 inspection program areas and competencies that comprise the Uniform Inspection Program Audit Worksheet for omissions, additions, and items they deem to be not applicable.
- Determined whether the audit process is properly positioned as part of the Standard 4 criteria.

Uniform Inspection Program – Audit Worksheet

A significant component of the pilot project was the use of the Uniform Inspection Program – *Audit Worksheet*. This worksheet was developed during 2008 and 2009 after the CFP Certification for Food Safety Regulatory Professionals Work Group completed a comprehensive review of the field audit process used by FDA for their Consumer Safety Officers. The Uniform Inspection Program – *Audit Worksheet* was designed to be used by the jurisdictions as a quality assurance tool to measure the effectiveness of a jurisdiction's inspection program based on the performance elements and competencies identified in the Standard 2 – Trained Regulatory Staff, Field Training Plan. The use of the Uniform Inspection Program Audit provides a mechanism for regulatory jurisdictions to conduct quality assurance evaluations of their retail food protection programs while assessing the strengths and weakness within their training program for Food Safety Inspection Officers.

The data and feedback received from the pilot project jurisdictions on actual use of the Uniform Inspection Program – *Audit Worksheet* provide important insights on the strengths and weaknesses of using the Standard 4 criteria and assessment protocol as a quality assurance measurement. As a result of input received during the project, the CFP Certification for Food Safety Regulatory Professionals is submitting an issue to the 2012 Conference recommending that the Standard 4 criteria be reviewed, and revised were appropriate, to better reflect a comprehensive inspection program quality assurance protocol and measurement.

Terminology

For purposes of this report, the following terms and acronyms are defined:

Audit Worksheet – *Worksheet* used by jurisdictions during the two joint food safety inspections to assess FSIOs ability to demonstrate specific performance elements and competencies

FSIO – Food Safety Inspection Officer is an individual that has been newly hired or newly assigned to a regulatory retail food program

Uniform Inspection Program - Jurisdiction Audit Feedback Form – The survey instrument used during the pilot project to collect data and feedback from jurisdictions on the uniform inspection program audit process and forms. Terms in the narrative of the report pertaining to “survey”; “survey instrument”; and/or “survey questions” are direct references to the Jurisdiction Audit Feedback Form.

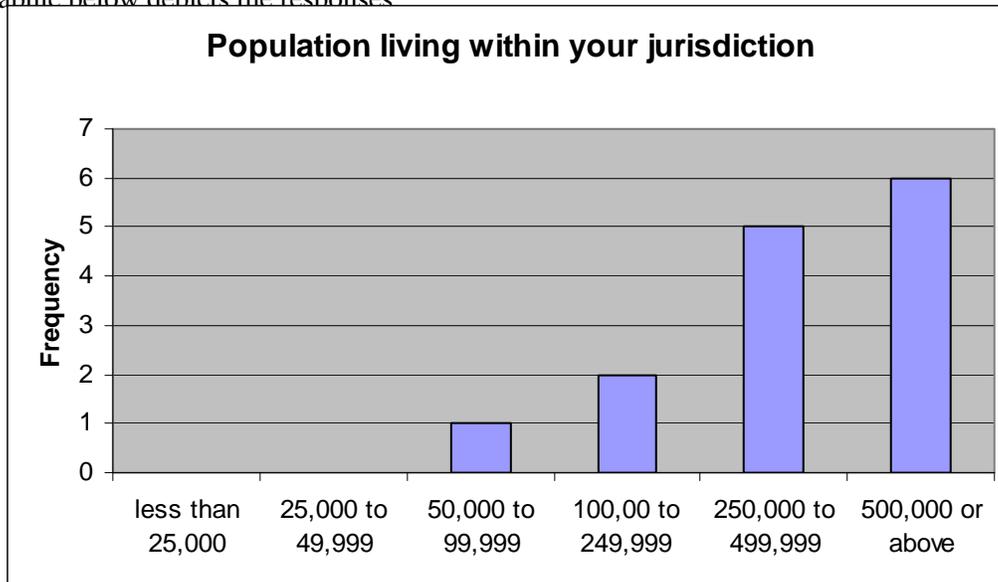
Uniform Inspection Program Audit Pilot Project Report

Section I - Demographics of Participant Jurisdictions

What is the population living within your Jurisdiction?

- A. less than 25,000 (0) B. 25,000 to 49,999 (0) C. 50,000 to 99,999 (1)
D. 100,000 to 249,999 (2) E. 250,000 to 499,999 (5) F. 500,000 or above (6)

A total of 14 jurisdictions participated in the Audit Pilot Project. The population in these jurisdictions ranged from one jurisdiction with a population of 50,000 to 99,999 to 11 jurisdictions with populations of 250,000 or higher. Of the jurisdictions responding, 43% had population sizes of 500,000 or higher. The graphic below depicts the responses.

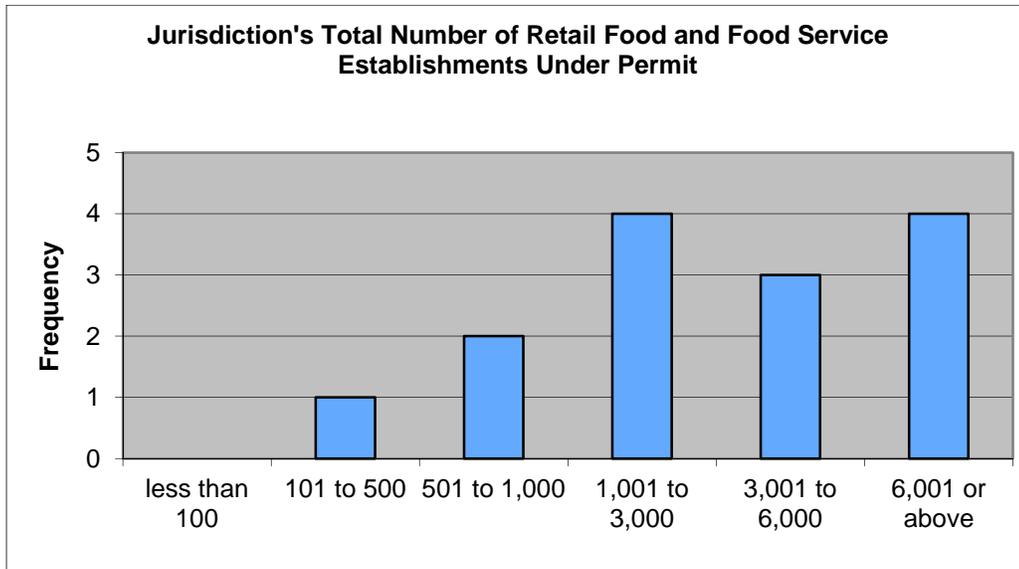


What is your Jurisdiction's total number of retail food and foodservice establishments under permit?

- A. less than 100 (0) B. 101 to 500 (1) C. 501 to 1,000 (2)
D. 1,001 to 3,000 (4) E. 3,001 to 6,000 (3) F. 6,001 or above (4)

Of the 14 jurisdictions responding, no jurisdictions had less than 100 foodservice establishments under permit, while seven reported 3,001 or more such establishments. Fifty-nine percent (59%) of the jurisdictions reported having 3,001 or more establishments under permit. Twenty-nine percent (29%) of the jurisdiction reported having 6,001 or more establishment under permit. The graphic that appears at the top of the next page depicts the responses.

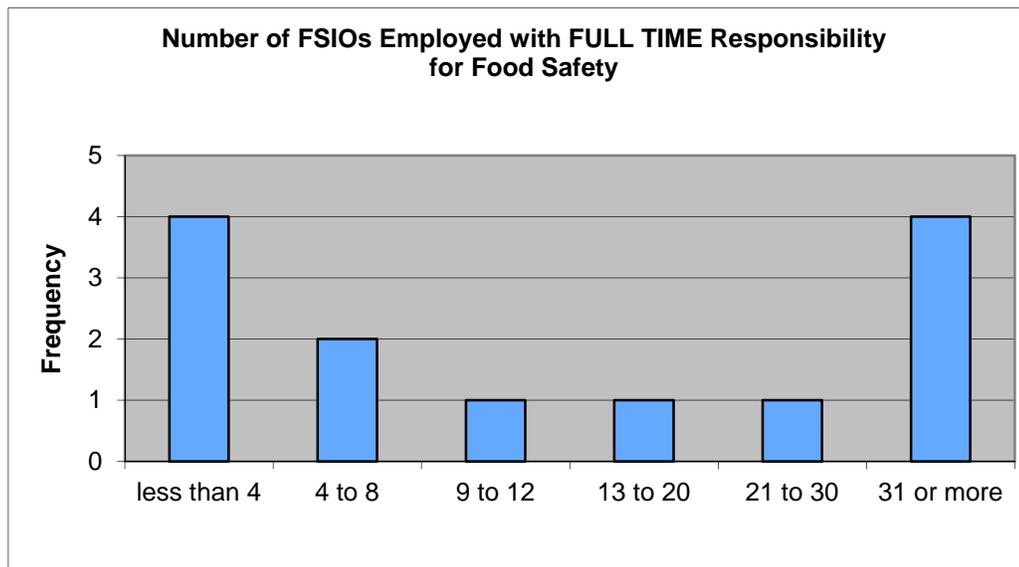
Uniform Inspection Program Audit Pilot Project Report



How many Food Safety Inspection Officers are employed by your Jurisdiction with FULL TIME (i.e., 100%) responsibility in the food safety program?

- A. less than 4 (4)
- B. 4 to 8 (2)
- C. 9 to 12 (1)
- D. 13 to 20 (1)
- E. 21 to 30 (1)
- F. 31 or more (4)
- G. No Response (1)

Of the 13 jurisdictions responding, four (31%) reported having less than 4 full-time FSIOs while four (31%) reported having 31 or more full-time FSIOs. The median number of responding jurisdictions was 9 to 12 full-time FSIOs. The chart below depicts the responses.

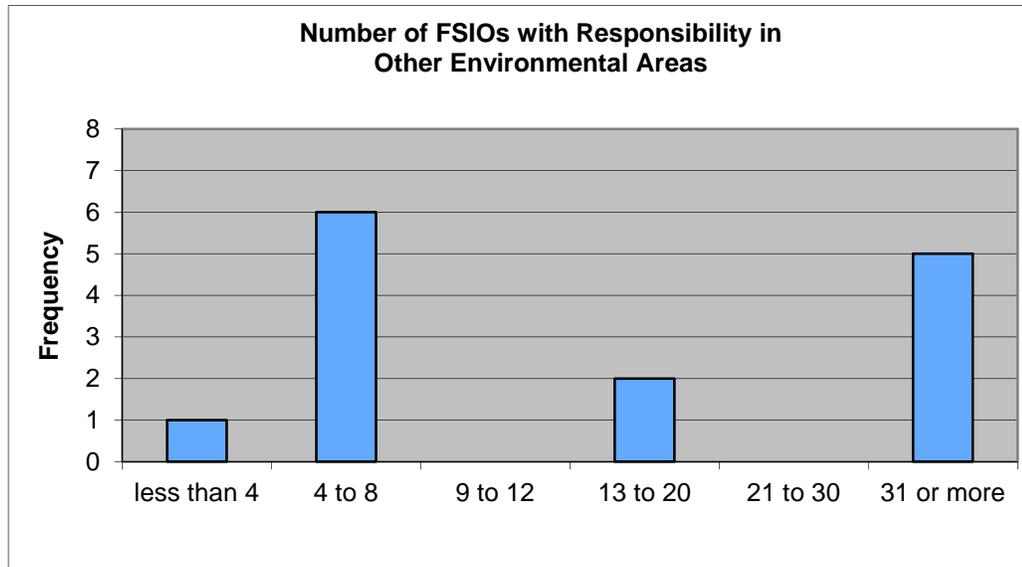


Uniform Inspection Program Audit Pilot Project Report

How many Food Safety Inspection Officers are employed by your Jurisdiction with responsibilities in other environmental health program areas in addition to their retail food protection duties?

- A. less than 4 (1) B. 4 to 8 (6) C. 9 to 12 (0)
D. 13 to 20 (2) E. 21 to 30 (0) F. 31 or more (5)

Of the 14 jurisdictions responding, the number of FSIOs with responsibilities in other environmental health program areas in addition to their retail food protection duties ranged from one jurisdiction with less than 4 FSIOs with alternate assignments to five jurisdictions (36%) having 31 or more FSIOs with alternate assignments. The graphic below depicts the responses.

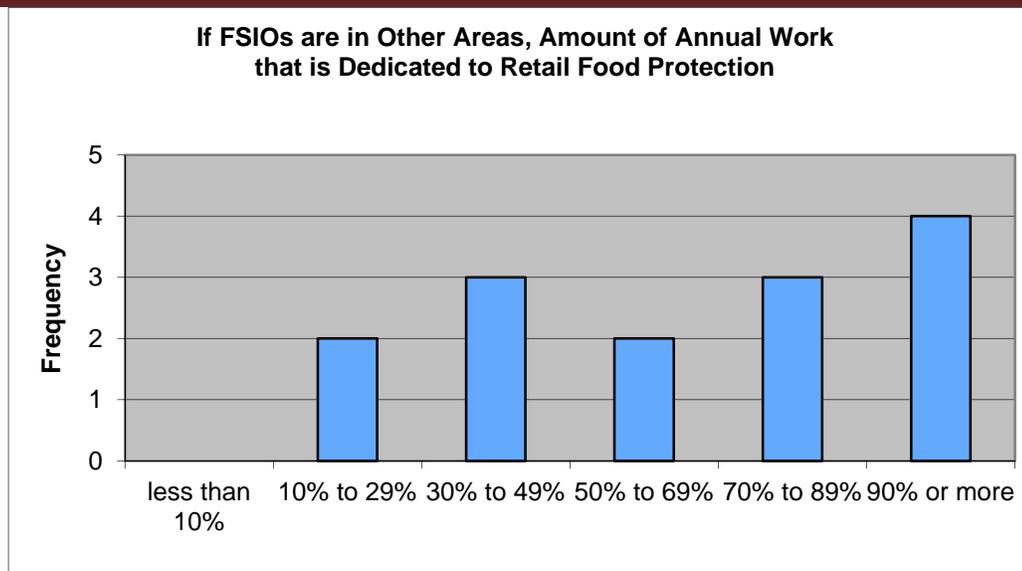


If your Food Safety Inspection Officers have responsibilities in other environmental health program areas, on average, how much of their annual work plan is dedicated to the retail food protection program?

- A. less than 10% (0) B. 10% to 29% (2) C. 30% to 49% (3)
D. 50% to 69% (2) E. 70% to 89% (3) F. 90% or more (4)

Of the 14 jurisdictions responding, two jurisdictions reported that their FSIOs dedicate, on the average, 10% to 29% of their annual work plan to the retail food program, while seven jurisdictions (50%) reported that their FSIOs dedicate 70% or more on their retail food program responsibilities. Twenty nine percent (29%) reported that their FSIOs dedicate 90% or more percent of their annual work plan to the retail food protection program. The following graphic appearing at the top of the next page depicts the response.

Uniform Inspection Program Audit Pilot Project Report



Is your Jurisdiction AWARE of the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*?

Yes (14) No (0)

All 14 jurisdictions responding reported that their jurisdiction is aware of the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*.

Is your Jurisdiction ENROLLED in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*?

Yes (14) No (0)

All 14 jurisdictions responding reported that their jurisdiction is enrolled in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*.

If enrolled in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*, has your jurisdiction MET all the Standard 2 – Trained Regulatory Staff criteria?

Yes (14) No (0)

All 14 jurisdictions responding reported that their jurisdiction meets the Standard 2 – Trained Regulatory Staff criteria contained in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*.

Does your Jurisdiction have a written field training plan that identifies the specific job performance elements and competencies a FSIO is expected to demonstrate during foodservice and retail food inspections?

Yes (14) No (0)

All 14 jurisdictions responding reported that their jurisdiction has a written field training plan that identified the specific performance elements and competencies a FSIO is expected to demonstrate during inspections of foodservice and retail food establishments.

Uniform Inspection Program Audit Pilot Project Report

If your answer to Question #9 above is YES, please identify the type of written FSIO field training plan that is in use within your jurisdiction.

Of the 14 jurisdictions responding, 12 jurisdictions (86%) indicated that they use a customized version of the CFP Field Training Plan included as an Appendix with Standard 2 – Trained Regulatory Staff.

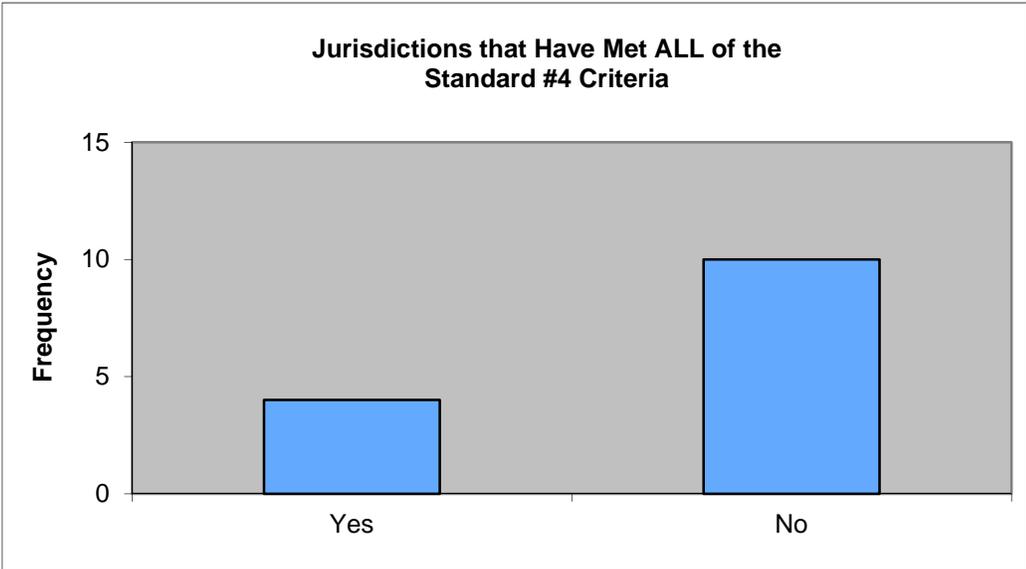
<p>A. The CFP Field Training Plan as presented in Appendix B-2, Standard #2 – Trained Regulatory Staff, <i>FDA Voluntary National Regulatory Retail Food Program Standards</i> (0)</p>	<p>C. A Field Training Plan developed in-house that meets the intent and scope of the CFP Field Training Plan (1)</p>
<p>B. A customized version of the CFP Field Training Plan, Appendix B-2, Standard #2 – Trained Regulatory Staff that is specific to our jurisdictions retail food inspection protocol (12)</p>	<p>D. Other (1)</p>
<ul style="list-style-type: none"> • We are moving from a Field Training Plan program developed in-house to a customized version of the CFP Field Training Plan. Mostly we are using a customized version. • We have written policies and procedures for staff to follow while conducting inspections. 	
<ul style="list-style-type: none"> • We have specific protocols for inspections, training and enforcement that closely emulate federal standards and include state of Michigan accreditation standards. • Our field training worksheet is almost identical to the one in Appendix B, except some sections are removed or slightly edited. For example, we don't use the section about sampling. • Our agency has added the following to the CFP Field Training Plan: 1) the FSIO completes an open-book exercise on the content of the Texas Food Establishment Rules; 2) the FSIO must complete a citation exercise on the first 25 independent inspections. • We have adopted the CFP Field Training Plan Appendix B-2 as presented and all FSIO's/Inspectors have completed the necessary training needs as specified by the Taney County Health Department, TCHD. The training involves mandatory state trainings and jurisdiction specific requirements as determined by the agency administrator. 	

If enrolled in the *FDA Voluntary National Retail Food Regulatory Program Standards*, has your Jurisdiction MET all the Standard #4 – Uniform Inspection Program criteria?

Yes (4)

No (10)

While all 14 jurisdictions reported meeting the Standard 2 – Trained Regulatory Staff criteria contained in the *FDA Draft Voluntary National Retail Food Regulatory Program Standards*, only 4 (29%) indicated they met the Standard 4 – Uniform Inspection Program criteria. The graphic appearing at the top of the next page depicts the response.



Uniform Inspection Program Audit Pilot Project Report

Section II - Guide to Uniform Inspection Program Audit - Content Evaluation

Were the instructions given in the *Guide to the Uniform Inspection Program Audit* sufficient for you to understand and implement the uniform inspection audit process in your jurisdiction?

Yes (11)

No (3)

The majority of respondents (78.6%) indicated that the instructions given in the Guide were sufficient for understanding and implementation of the audit process.

Please put an "X" in the boxes below to identify any Section(s) of the *Guide to the Uniform Inspection Program Audit* you believe needs improvement. Please provide your recommendation(s) for improving the *Guide* in the space provided for each subject area. The page number from the *Guide* for each subject area is included in parentheses. If you have no recommended changes for a specific Section of the Guide, leave the corresponding box and comment area blank.

GUIDE TO THE UNIFORM INSPECTION PROGRAM AUDIT

Preparing for Pilot Project Participation (page 1)

The write-in comments for this section are summarized below:

- Recommend clarifying that the review of the most recent three "inspection reports" are "regular" or "routine" inspections.
- The link to the Clearinghouse Q&A would not work.
- My overall comments on the document are that it's not helpful. We need a document similar to what was developed for Standard 2 that really explains the criteria for each component of the standard. This doesn't do it. We used it for about 4 staff members and found it to be too long and too cumbersome. We developed a one page summary that we used for the rest of our staff with whom we have done the joint inspections. The major item missing is the competencies, the criteria, for the ten elements--what is acceptable and what is not acceptable
- After the following statement:
"After completing the training requirements in Steps 1 through 3, Standard 2, Trained Regulatory Staff,"
List the steps 1 through 3. This gives the reader the needed information instead of having to look on another document to know what the 3 steps are. It may be helpful to describe/define "inspection quality" and the value of assessing quality via an audit process.

Purpose of the Uniform Inspection Program Audit (page 2)

The write-in comments for this section are summarized below:

- Purpose of the UIP could have been expanded and explained a little better.
- The explanation of the purpose of the Uniform Inspection Program Audit was clear and understandable.

Uniform Inspection Program Audit Pilot Project Report

Selection of Establishments (page 2)

The write-in comments for this section are summarized below:

- How to select establishments was confusing. One question that was raised was how we could ensure establishments were not selected (or guard against) because of the amount of time an inspection would take (i.e. pick the “easy” ones).
- There should be additional clarification on determining what facilities should be selected as audit locations. Go back 3-5 years in the file to establish the firm has a history that needs follow-up, since many questions address issues from follow-up on previous violations and long term compliance. For example, pick complex establishments to make sure they are representative of all the components you need to evaluate.
- What are the standard 4 criteria that are to be followed in selecting establishments for the audit?
- The highest risk category establishments should always be included in the evaluation process even if the majority of the workload in the FSIO's jurisdiction is low risk.
- Selection of establishments should be from categories 3 and 4 from 2009 FDA Food Code Annex 5, Table 1 - Risk Categorization of Food Establishments,
- More guidance, education and direction to managers to ensure that they use strategies that involve randomization which will significantly help reduce potential for bias from a statistical standpoint. This will increase the reliability of the data collected.
- List the criteria from Standard 4. This gives the reader the needed information instead of requiring the reader to look on another document.

File Review – Selected Establishments (page 2)

The write-in comments for this section are summarized below:

- Include direction to compare what has changed at the store to the file history (name, operations, menu, etc.) so the need for changes in risk category or inspection frequency are identified.
- Must all 3 inspections in the file review have been completed by the inspector who is being audited? If so, how should newer inspectors be audited? For example, if a restaurant receives one inspection per year, it may be up to 4 years before an inspector can be audited.
- File review could be more clearly defined to include all auxiliary activities related to the establishment e. g. sampling, consumer complaints etc. that may not be included in the 3 most recent inspection reports.
- There needs to be more explanation for what items of the inspection report is to be reviewed during the file review.

FSIO's Role During Joint Field Inspections (page 2)

The write-in comments for this section are summarized below:

- To expect no communication between the FSIO and the auditor is unrealistic. There will be questions asked from both parties.
- The statement "The FSIO is responsible for independently conducting the inspection while being evaluated by the auditor." gives a mixed message, as the audit isn't about evaluating the FSIO. The audit's purpose is to identify strengths and weaknesses within the training program as one means of assessing quality.

Uniform Inspection Program Audit Pilot Project Report

Uniform Inspection Auditor's Role During Joint Inspections (page 2)

The write-in comments for this section are summarized below:

- This is the hardest part of the audit program. When should the auditor step in if the FSIO is giving incorrect corrective actions or missed a potential imminent health hazard. It is very hard to watch the inspection and not give input. It really shows the value of standing back and observing what is going on in the facility as a whole and not jumping to details.
- There is no guidance included for auditor qualifications, only their role during the inspection. This can be difficult for some jurisdictions when there are union contracts, etc. There should be additional training requirements for the auditors specifically on the subject of auditing, since that will make a difference in how the audit protocol is applied and interpreted in the field.
- Please clarify whether or not the auditor should step in if the inspector misses a violation: a) during the inspection? b) at the end of the inspection, before leaving the facility, or c) not at all? Does this answer depend on the nature of the violation, e.g. a non-critical violation vs. a critical violation or a violation that involves adulteration (for example, an employee is about to serve a contaminated food item to a customer)?
- Needs to be expanded so this will not be a re-standardization. Also might list qualifications for the auditor. If the FSIO's are one's own employees then there might be a "halo effect."
- The auditor will have a role during the inspection. The auditor--that third person--will have an impact on the person in charge as well as the FSIO being audited. It needs to be acknowledged and recognized that the FSIO will think their manner of conducting an inspection is being assessed--as it is.
- Auditors need some more education in regard to their role during the inspection.
- Provide a systematic selection process for choosing establishments randomly with more specific criteria such as: establishments must have had an inspection within the last week/month/year; the establishment must be open for business for a set amount of time prior to the audit (such as 1-2 years); the inspector should have previously inspected the select establishments for a specified number of visits (for those jurisdictions with rotating work lists) prior to the audit; to name a few.
- One establishment selected for our audit had not been inspected for over one year and made it hard to track past inspection findings, compliance, and enforcement. Some other establishments selected for the audit were previously inspected by a different inspector which also made it hard to track. It seems that a lack of more specific selection criteria could possibly skew audit results.
- List the standard 4 criteria. This gives the reader the needed information instead of requiring the reader to look on another document.

Pilot Project Steps – Uniform Inspection Program Audit – Step 1 (page 2)

Only one generic comment for this section:

- This looks good

Pilot Project Steps – Uniform Inspection Program Audit – Step 2 (page 3)

Only one generic comment for this section:

- Step 2 This looks good

Uniform Inspection Program Audit Pilot Project Report

Pilot Project Steps – Uniform Inspection Program Audit – Step 3 (page 3)

The write-in comments for this section are summarized below:

- The guidance is confusing when it states "establishments used in the audit must be selected in accordance with the protocol outlined in Appendix D, Std 4". It should clearly state the "number of establishments that need to be selected" instead of just "establishments" since that appendix only addresses the statistical calculations and the number of establishments needed. The way it is currently written implies that protocol for the actual facility selection is found in Appendix D.
- The guide states that "Establishments used in the audit must be selected in accordance with the protocol outlined in Appendix D, Standard 4." This appendix does not specify how establishments should be selected. Establishments selected should be from categories 3 and 4 from 2009 FDA Food Code Annex 5, Table 1 - Risk Categorization of Food Establishments
- Step 3 looks good.

Pilot Project Steps – Uniform Inspection Program Audit – Step 4 (page 3)

The write-in comments for this section are summarized below:

- Again, the competencies for the 10 criteria are not outlined in this document, nor is the audit tool clearly defined.
- Found the Uniform Inspection Program Audit Reference Guide to be very helpful as an auditing tool for determining competencies to observe for each inspection program area. Would prefer using it not only in conjunction with this pilot project, but for future audits as well. The examples were helpful and kept the auditor on task
- Include the 10 inspection program areas listed in standard 4, so the reader doesn't have to refer to another document

Pilot Project Steps – Uniform Inspection Program Audit – Step 5 (page 3)

The write-in comments for this section are summarized below:

- Unclear on what is being looked at by the auditor during the file review. Make sure the FSIO acts on repeat violations or the establishment is acting upon their risk control plans?
- I think I understand, but not sure why the Guide says that the auditor should complete the "Audit Results Summary section of the Audit Results Summary and FSIO Training Plan Form." Why not just say that the auditor should complete the "Audit Results Summary and FSIO Training Plan Form"?
- The following sentence "The Audit Results Summary establishes a method for providing feedback to the FSIO and identifies any inspection program areas or competencies the FSIO needs additional training on." Is confusing. It gives the impression that the Audit and the Assessment of Training Needs processes have the same purpose. Because the 10 inspection program areas are broad (not linked to specific performance elements like the Assessment of Training Needs is) it may be inaccurate to identify an individual's specific training needs based upon 1 or 2 inspections where an auditor is present. The audit seems more suited to identifying areas where further policy development and/or training is needed for all (and where overall strengths are found).

Uniform Inspection Program Audit Pilot Project Report

Pilot Project Steps – Uniform Inspection Program Audit – Step 6 (page 3)

The write-in comments for this section are summarized below:

- It was not clear from the guide that for the pilot project this calculation was an optional step. Only a portion of our staff was audited to do this project, so this step was not possible. However, the step would be clear if the document was for guidance to evaluate the entire program and not just for the purpose of completing this pilot project.
- Attach the tables from Appendix D, Standard 4, so that the reader can access all needed information in one place.

Pilot Project Steps – Uniform Inspection Program Audit – Step 7 (page 3)

No comments were submitted for Step 7

Uniform Inspection Program Audit Pilot Project – Reference Documents (page 4)

Only one comment for this section:

- Add 2009 FDA Food Code as a reference document

Uniform Inspection Program Audit Pilot Project Report

Section III Audit Worksheet and Audit Reference Guide – Content Evaluation

The 10 Uniform Inspection Program Components included on the *Audit Worksheet* (and identified on page 1 of the *Audit Reference Guide*) sufficiently address inspection uniformity, inspection quality, inspection frequency, and uniform application of the regulatory jurisdictions retail food safety regulations and administrative procedures and are appropriate for all retail food program inspection staff. (Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

Strongly Disagree

1

2 (1)

3 (3)

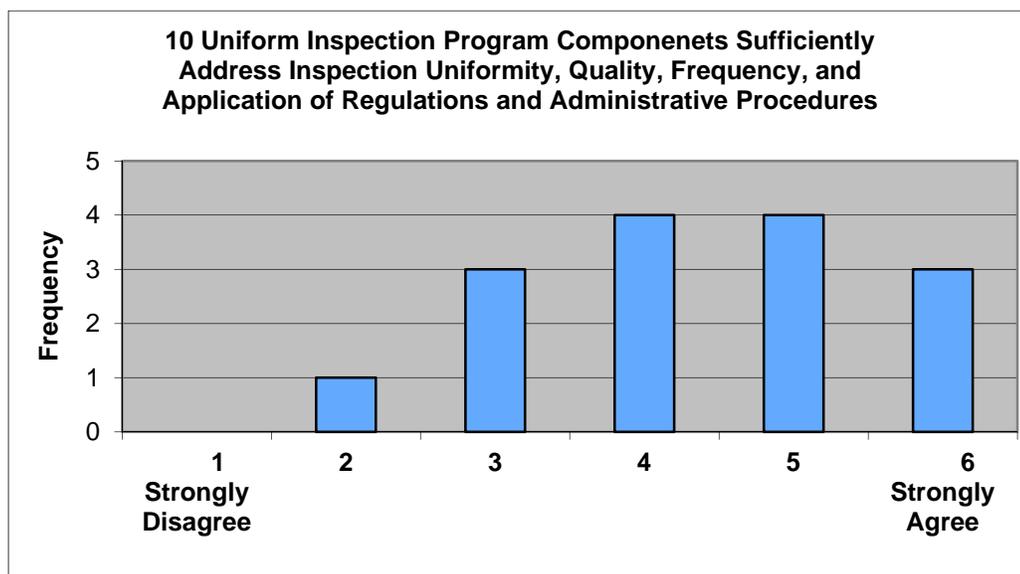
4 (3)

5 (4)

Strongly Agree

6 (3)

Responses to this statement ranged from a low of 2 to a high of 6 with a mode (most frequently selected response) of 5. The mean (average) was 4.36 and the median (midpoint) was 4.5. Half of the jurisdictions (50.0%) selected 5 or higher, agreeing that the 10 performance elements sufficiently address the knowledge and skills a FSIO needs to effectively conduct independent inspections. The graphic below depicts the responses:



Please explain the reasons used to determine this rating.

Positive comments:

- Components made sense and had a lineal path.
- The audit guide explains the worksheet well. The program works well for local health depts. in Michigan that inspect retail food service establishments. Our state accreditation requirements are closely matched to the inspection components.
- All these components are the key to performing the job effectively because they cover all the knowledge, skills and abilities that FSIO's are expected to have to be successful.
- The audit reference guide was helpful in determining what performance elements should be considered for each section of the audit form.

Uniform Inspection Program Audit Pilot Project Report

Challenges:

- It was sometimes difficult to distinguish which category to debit some of the observations because they either blended together or required double debiting because of the nature of the observation.
- Some of the points are subjective and lead to individual interpretation.
- The Audit Worksheet is all subjective; there are no objective standards set for the competencies.

Recommendations for improvement:

- It could be broken down to be more detailed, to be a bit more specific to the needs.
- I believe item #1 can be best determined by creating a checklist, then based on a percentage, the auditor notes YES or NO.
- The identified categories are all there. However, the vagueness of the questions, the order in which the questions were organized, and the performance areas/competencies that are used as examples for each question in the guide do not seem logical for the purpose of conducting a field audit. Many times, the performance area/competency listed in the Reference Guide did not seem related to the question. Also, the weight of each question (i.e. the number of inspectional performance areas/competencies that each question was supposed to represent) did not seem equal for all questions. For example, questions 1 and 2 represented 5 or more competencies while question 10 represented only 1 competency. Additionally, for remotely located staff there can be some difficulty with establishing question 10 based on program policy (we typically mail all inspection and tracking documents in once a week, not per inspection, which is difficult for the auditor to determine while still completing the worksheet for one inspection and presenting findings in a timely manner to the auditee). There also seems to be overlap between question 2 and subsequent questions that discuss documentation in the Reference Guide. Proper documentation (whether a violation in routine inspection report as repeat occurrence or with additional regulatory documentation such as sanitary notice, embargo, etc.) seems to fall under both 2 and 6. There also appears to be overlap between 2 and 4 in regards to documentation in the inspection report for the code provisions (is it there vs. is it accurate?). The documentation for 7 could also be interpreted as being under 2 as well. Items 8-10 might also be better evaluated at a program level through management of resources and follow-up instead of at the individual inspection level. Whether or not the required frequency of inspection is being met could be based on many different factors and I don't think that is captured here (resources vs. improperly assigned risk category vs. management of facility inspection schedules based on risk). Number 8 is limited to long term corrections for continued out of compliance and could be better represented as long term corrections for all out of compliance findings (as opposed to just repeat violations).
- I wish there were a good way to include inspectors' demeanor as part of this audit. For example, focusing on educating the restaurant employees and fostering an atmosphere of change (when necessary), as opposed to focusing on the enforcement of violations through use of force or intimidation.
- Found competencies #1 and #4 to be similar when completing the audit worksheet. The 10 uniform component questions were vague and need to be more specific for the auditor to follow.
- The program components provide a means to sufficiently assess inspection frequency and uniformity (across the 10 components). The 10 components do not adequately address inspection quality. Uniformity does not always equal quality. In order to promote success in long-term control of foodborne illness risk factors, the program components should include an assessment of a food program's capacity for conducting effective risk-based inspections.

Uniform Inspection Program Audit Pilot Project Report

The required minimum of two retail food establishment file reviews and joint field inspections for each FSIO is the appropriate number for completing a uniform inspection program audit

Yes (11)

No (2)

Both (1)

The majority of jurisdictions 78.6% felt that the minimum of two retail food establishment file reviews and joint field inspections for each FSIO is the appropriate number for completing the inspection program audit.

Explanations provided for the responses to the question above.

YES – the minimum of two file reviews and joint inspections are appropriate

- Agreed. Was hard for us to meet this requirement due to the time it took from other tasks.
- The first joint inspection was done incorrectly by the auditor. This is mostly because the auditor did not know how to complete the audit worksheet. Had the audit been done correctly the first time, two inspections would be enough to complete the audit.

NO – the minimum of two file reviews and joint inspection are appropriate

- We feel that only two inspections do not give the training coordinator enough information to get an accurate feedback on what is lacking in the training program. How do you determine if the presence of the auditor is causing the FSIO to be nervous and making errors in the inspection? We are not sure as to how many, but enough to build up a comfort level with the auditor to remove the anxiety. This may be something that has to be developed at the beginning with a trainee and on through a mentor program or audit program with the supervisor.
- It depends on the number of FSIO's on staff. For instance, if we have only a few FSIO's, we need to do more than just two otherwise this can lead to major statistical analysis problems like; lack of internal consistency, unreliability of the data and the validity of the data can be questionable. Increasing the minimal number of file reviews and joint field inspections across the board can take care of these three major statistical analysis problems significantly. Also, encouraging the auditor's to select facilities to be inspected on a proven methodology like randomization thereby eliminating some forms of bias that might interfere with the credibility of the data.

Both YES and NO – the minimum of two file reviews and joint inspection are appropriate

- It depends on how often an audit is conducted. I would think that 2 file reviews and inspections per FSIO every 6 months would be ideal. Less often (once per year) would be acceptable if other uniformity controls were in place, for example, requiring FSIOs to conduct joint inspections with each other every so often, so they can see their differences for themselves. We have found that this is a good way to discover questions you didn't know you even had.

Uniform Inspection Program Audit Pilot Project Report

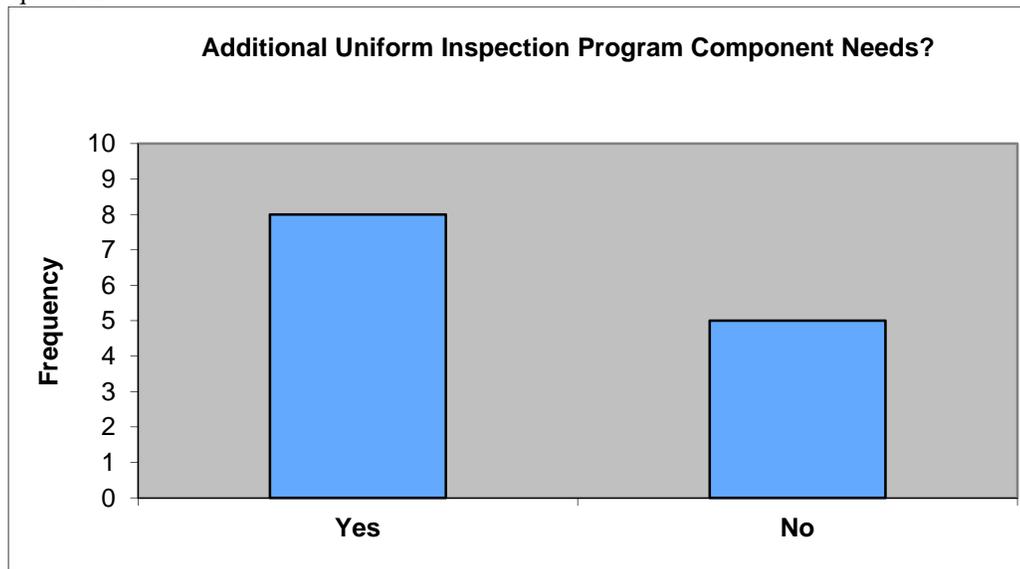
Are there additional Program Components that you believe are necessary in order to effectively conduct a uniform inspection program audit but are MISSING from the current *Audit Worksheet*?

Yes (8)

No (5)

No Response (1)

Of the 13 jurisdictions responding, eight jurisdictions (61.5%) indicated that the current Audit Worksheet did not contain all the program components that are necessary to effectively conduct an inspection program audit. The graphic below depicts the response to this question.



Please identify and describe these missing components

YES– additional program components need to be added to effectively conduct a uniform inspection program audit

- Issues directly related to scoring an inspection. Feds/State do not score inspection. This can get “sticky” when doing an audit.
- Does the FSIO verify compliance with local requirements (i.e., is the establishment properly permitted based on the local/state permit requirements and meets the jurisdiction’s requirements regarding food manager and employee food handler permit training requirements)? Perhaps this is to be included in #9.
- Some sort of weighting to make not meeting number 1 to be of greater import statistically than the other items like number 10. Maybe breaking the large section questions into multiple questions?
- The importance of determining risk factors is unquestionable. However good retail practice need to be represented in a distinct manner whether it be in a separate category or made clearer in the categories already developed.
- I was unable to find a good place to document items related to professionalism as exhibited by the FSIO. I was looking for something similar to the professionalism performance elements found in the CFP training guide.
- The program components should include an assessment of a food program's capacity for conducting effective risk-based inspections.

NO – additional program components need to be added to effectively conduct a uniform inspection program audit

(No specific comments provided on feedback form for the “NO” responses)

Uniform Inspection Program Audit Pilot Project Report

Were any of the 10 Program Components consistently difficult to assess during the uniform inspection program audit?

Yes (8)

No (4)

No Response (2)

Two-thirds (66.7%) of the 12 jurisdictions responding indicated that some of the 10 Program Components were consistently difficult to assess during the inspection program audit.

If you have identified DIFFICULT TO OBSERVE Program Component(s), what factors made them difficult to observe?

ITEMS 1, 3, 6

- Please refer to #1 of this section. Both are asking if the FSIO interpret enforcement procedures that are similar. For instance, 3 is looking at part to policies and procedures while 6 is looking at jurisdictions administrative procedures. One and the same, although the examples do give some differentiation.

ITEM 3

- Unclear – Explain what “Interpret” means or put into context.

ITEM 5

- This item could be addressed using a database and is harder when agency (local) depends on “Paper” review.
- The Audit Worksheet is vague and it is very hard to use as a standalone document. The questions do not clearly indicate or represent the performance areas/competencies that the Guide indicates. The 10 program components on the Audit Worksheet are not coordinated to flow with the normal inspection process itself. It also does not follow the same flow that the Abbreviated Field Inspection Training Worksheet has, which was used as a secondary reference when additional guidance was needed to connect observations from the audit with the proper program area/competency for documentation.
- It was difficult to assess review of past inspection findings when there were no violations present or when a different inspector previously inspected. Our files are mostly electronic.

ITEM 6

- File review may not have included any inspections that required follow up, or the previous inspections for the establishment may have been conducted by a different inspector. If the current joint inspection required a follow up, I would generally have completed my audit before the follow up inspection came due. (Perhaps I should have kept the audit "open" until after the follow up inspection, a month or so later?)
- The Audit Reference Guide gives the following examples of competencies for Item 6
 - *FSIO follows the jurisdiction’s compliance and enforcement policies and procedures regarding repeated and unresolved violations.*
 - *FSIO follows the jurisdiction’s policy in regard to disclosure of confidential information.*

There was never an opportunity to assess FSIO adherence to our policy regarding of confidential information during the audit process.

ITEMS 8 and 9

- We are still working on some of the components of the standards such as a uniform system for determining the risk category for a facility. We did not run across a situation where we had a long term control problem that could be addressed with the options listed in item 8 nor have we consistently used these options as a tool.

ITEM 9

- It’s easy to observe licensed risk category but difficult to observe FSIO confirming the license process codes used in WI match the processes the establishment is engaged in.

Uniform Inspection Program Audit Pilot Project Report

ITEMS 8 and 10

- If you are only doing two joint inspections with the FSIO, documenting long term issues may be difficult to document. On item 10 our program does this but indirectly by receiving a report from our IT department when each inspector downloads their inspections.

Were there specific Program Components that FSIOs consistently experienced DIFFICULTY with?

Yes (10)

No (4)

Please identify these by placing an “X” adjacent to the item number of the Performance Element(s) FSIOs had DIFFICULTY with. The Item number below corresponds to the same item number on the Audit Worksheet.

Audit Worksheet

Item 1 (4)

Item 2 (1)

Item 3 (1)

Item 4 (2)

Item 5 (5)

Item 6 (1)

Item 7 (1)

Item 8 (3)

Item 9 (1)

Item 10

Based on the responses above, 10 jurisdictions (71.4%) indicated there were Program Components that FSIOs had consistent difficulty with. These pilot project results appear to indicate that there are several Program Components that should be reviewed for clarification or re-assessed to address the specific comments presented in the next section.

If you have identified Program Component(s) that FSIOs experienced DIFFICULTY with, what factors contributed to their challenges

ITEM 1

- How many of the Risk Factors would an FSIO be allowed to miss? Very few FSIOs inquire about health policies and perhaps missed a food cooling in the walk-in cooler.
- There was almost always some variation between the auditor and the FSIO. If the inspector misses just one violation, or forgets to ask about food source, or fails to take a temperature of an item that was cooked, then Item 1 is marked NO. So more often than not, our FSIOs did not meet item 1.
- Inspectors did not like the change of form from critical/non-critical to in/out/not observed/not applicable. Once the form was explained while looking at an inspection, they understood it better. It is also now used as a tool to educate operators to the overall picture of food safety in their establishment.

ITEM 2

- Legibility is in the eye of the beholder--handwriting that one person can easily read may not be easily read or understood by another person.

ITEM 3

- This program component was a catch all for not following our local jurisdictions policies and procedure. It is important that we capture the specific similar problems on the notes section to determine where the actual problem lies, especially for training purposes. There are too many variables in this program component that lead to non-compliance.

Uniform Inspection Program Audit Pilot Project Report

ITEM 4

- The FSIO did not always give the violation citation on the narrative. How many times does it take before the Auditor says that the FSIO gets a "did not meet the competency?"

ITEM 5

- Our agency does not have a computer system to track inspections. FSIOs do not have files in field and makes it hard to show facility staff past practices.
- What is meant by "act on repeated or unresolved violations"? We all know that there are those violations that will be noted as a repeat violation until such time the business is sold or burns down. Or are these only the High Risk areas?
- Historically, we have placed very little emphasis on reviewing past inspections (unless following up on a particular issue, short term). We are working on this weakness, but at this time, most inspectors were marked NO for item 5.
- Some of the FSIO's did not have a copy of the previous inspection with them. I feel you could present a case that is this really necessary? If the FSIO has been in this establishment sixteen times, is the previous inspection going to help?
- Not all FSIO's acted on repeated and unresolved violations and several of them did not file their reports on a timely manner as required.

ITEM 8

- Is there a difference between Item #5 and Item #8? Seems somewhat redundant. #5 and #8 should either be combined into one, or clarify the difference intended between the two.
- FSIO's struggled with documentation of correction recommendations or long term corrective action plans for items identified as out of control either during current inspection or from consecutive inspections. WI training has not emphasized the successful use of risk control plans. Encouraging and assisting the PIC to create a risk control plan for items identified as out of control will become an opportunity for WI to eliminate this difficulty.

ITEMS 1, 4, 6, 7

- Our current database system is lacking and causes inconsistency between inspectors. This is because inspectors have the option of completing a report that assesses the risk factors and interventions. Some inspectors are good at assessing all the risk factors, some are good at assessing some of the risk factors, and one inspector does not assess them at all. Additionally, there is a lack of program policies/procedures to insure uniformity such as required inspection form completion, disclosure of confidential information, filing of reports, administrative policies, jurisdictional statutes, etc. With the lack of program policies comes the lack of requiring immediate corrective action for out-of-control risk factors and overall compliance. Our inspectors also need better training on the application of rules/regs for the manufacturing establishments.

ITEMS 8 and 9

- We are still working on some of the components of the standards such as a uniform system for determining the risk category for a facility. We did not run across a situation where we had a long term control problem that could be addressed with the options listed in item 8 nor have we consistently used these options as a tool except during standardization.

Uniform Inspection Program Audit Pilot Project Report

Do you think there are any Program Components that should be DELETED from the *Audit Worksheet*?

Yes (5)

No (8)

No Response (1)

The thirteen jurisdictional responses to this item were fairly evenly spread. Eight jurisdictions indicated that none of program component should be deleted. Those that indicated yes were asked to identify the program components that should be deleted from the audit process. Out of the 10 Program Components, only three, Items 8, 9, and 10 were identified as one that should be deleted or combined with other program components.

Please identify these by placing an "X" adjacent to the item number of the Performance Component(s) that should be DELETED. The Item number below corresponds to the same item number on the Audit Worksheet.

Audit Worksheet

Item 1

Item 2

Item 3

Item 4

Item 5

Item 6

Item 7

Item 8 (2)

Item 9 (5)

Item 10 (1)

If you have recommended that one or more Program Components be deleted, what rationale can you provide to support the recommendation?

ITEM 8

- I think it may be difficult to document what was discussed during an exit interview. I think this could be corrected by training and documenting procedures.
- I don't foresee us incorporating the risk control plans, etc. into our program in the immediate future. We are however actively working on a system to identify if a firm is in the proper risk category with the proper frequency of inspection so item 9 will be very helpful to us once our system is in place.

ITEM 9

- RISK characterization should be a separate process that is very objective (not connected to an inspection).
- Items #5 and #8 can be combined.
- These elements may not need to be deleted completely, but analyzed in a subsequent process outside of individual inspections. They do not seem of equal weight to questions 1 and 2. They might also be better analyzed on a program level as opposed to during an individual inspection, such as question 9 determining if the required inspection frequencies are being met based on risk (probably more reflective of a resource allocation issue or prioritization issue at the program level as opposed to an individual inspector choosing to review an individual facility for inspection). More pieces of the program come into play for these items so it is deserving of a review in a broader context than an individual inspection.
- I don't necessarily think Item 9 should be deleted, but it doesn't really apply to us as every establishment has the same inspection frequency (once per year). I do realize that ideally, we would base our inspection frequency on risk- but at this time, as directed by our contract with KS Dept of Agriculture, we do not consider risk.
- There is too much latitude in the current risk category worksheets that are in use.

ITEM 10

- I don't feel this would help in the assessment of a program's effectiveness.

Uniform Inspection Program Audit Pilot Project Report

The performance areas/competencies listed as examples under each Program Component on pages 2 through 4 of the *Audit Reference Guide* are helpful to conducting the uniform inspection program audit. (Please place an "X" in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

Strongly Disagree

Strongly Agree

1

2 (1)

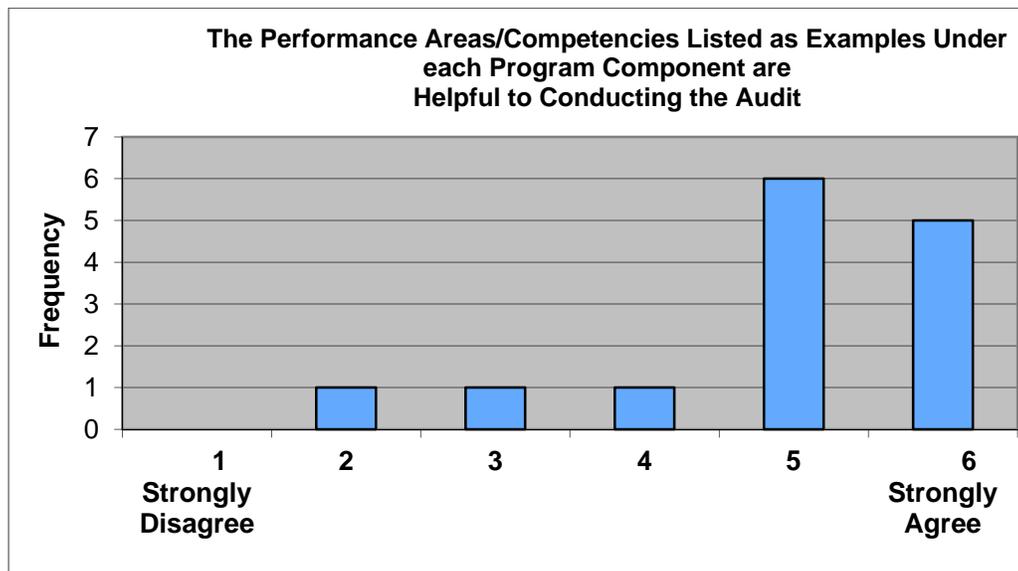
3 (1)

4 (1)

5 (6)

6 (5)

Responses to this statement ranged from a low of 2 to a high of 6 with a mode (most frequently selected response) of 5. The mean (average) was 4.92 and the median (midpoint) was 5. Eleven jurisdictions (78.8%) responded with a 5 or above indicating agreement that the performance areas/competencies listed as examples, were for the most part helpful to conducting the inspection program audit.



Please provide an explanation for your response.

- We felt this guide was very useful in navigating through the program.
- Yes, we like the detailed examples given.
- Item #1 is the most difficult one to assess and rate for our department. We currently have 27 Risk Factors and 27 Good Retail Practices. If the FSIO consistently misses one of these does the Auditor mark NO on the Audit sheet for #1?
- The audit Reference Guide is too abbreviated. Pages 2-4 help a little, but it is just too abbreviated. The performance areas/competencies listed in the Reference Guide have their own guide of associated inspection observations in the Abbreviated Field Training Reference Document (pages 7-10 of the Abbreviated Field Training Worksheet). It was difficult to use the forms (Audit Worksheet, Audit Reference Guide, Abbreviated Field Training Worksheet references) during the audit inspection because you had to jump around between 3 forms that do not follow the same pattern. This meant that the Audit Worksheet could not be completed during the audit inspection, but was completed at a later time when paging through resources and cross referencing was possible using notes from the audit inspection. The Abbreviated Field Training Reference Guide was the most helpful and the easiest to use as a reference while completing the Audit Worksheet.
- The reference guide helped with details of each audit question.

Uniform Inspection Program Audit Pilot Project Report

- Some areas may need more or better examples to help clarify the component.
- The examples are very helpful, but some could use additional clarification.
 - Item 1: Is the list of regulations all-inclusive, or should other critical violations also be considered in Item 1 (presence of pests, toxic chemical violations, plumbing problems, etc.)? Also, should Item 1 be marked NO if only one performance area is out (for example, missed checking one cooler but did check all other coolers at an inspection)? Or should we mark YES if there is substantial competency shown?
 - Item 3: Does "other regulations... prevailing statutes, regulations and/or ordinances" refer to other critical violations from the Food Code (such as presence of pests, etc.), non-critical violations in the Food Code, or violations that are not even in the food code (which for us could include verifying that employees possess Food Handler Cards, or whether or not they are in compliance with their grease interceptor pumping)?
 - Item 9: the second example (HACCP Plans and Variance documentation) doesn't seem to go with the header for Item 9 (proper risk category and required inspection frequency). But maybe that is because the intention is to base risk category on presence or absence of HACCP plans and variances (this is not the case for us)?
- The listing was very helpful and I feel that it could be expanded by offering more examples.
- Need more examples or more objective examples of what competency of the criteria means.
- This is one way to help the auditor understand the different components of each item thus ensuring that they consider all the possible problems that might be associated with each item. From a statistical standpoint, this is a way that the CFP team can ensure that all the auditors understand the parameters that they are supposed to assess and provide them with the most accurate information so that they may be able to increase the accuracy of the information that they collect from the different jurisdictions in the country. Those examples increase the specificity of the data collected.
- Could not use the audit worksheet without referring back to the reference guide. Suggest combining the audit worksheet and reference guide as one document.
- The list of examples was essential to the process.
- The examples are very helpful. They help to further define the expectation of each area. Without them the audit process would include a much higher potential for subjectivity and inconsistency.

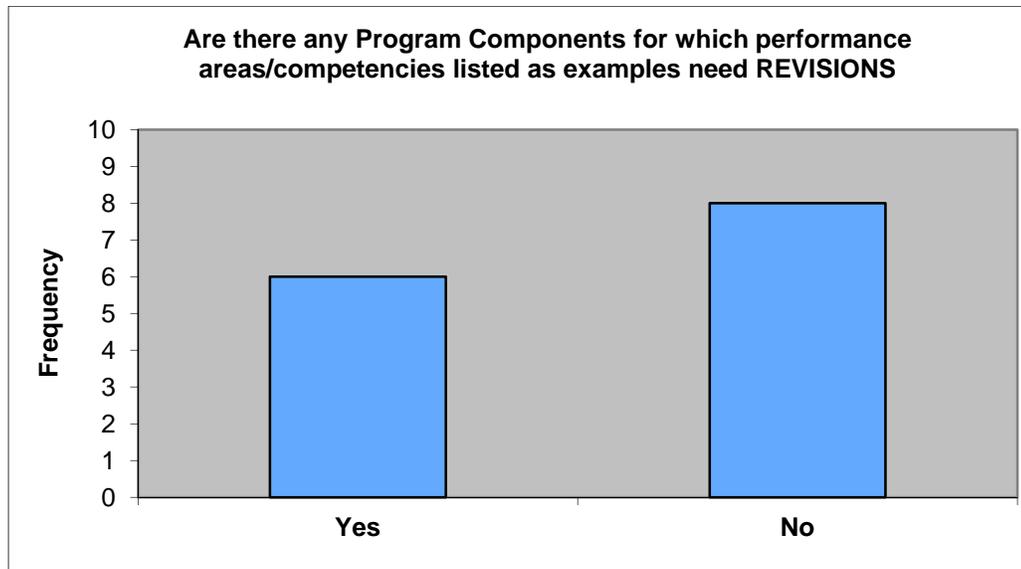
Are there any of the 10 Program Components for which the performance areas/competencies listed as examples on pages 2 through 4 of the Audit Reference Guide need REVISIONS (additions, deletions, changes)?

Yes (6)

No (8)

The responses to this item were almost evenly split with 6 jurisdictions (42.9%) indicating there were Program Components in need of revisions and 8 jurisdictions (57.1%) indicating there were NOT any Program Components in need of revisions. The graphic at the top of the next page depicts these responses.

Uniform Inspection Program Audit Pilot Project Report



Please identify these by placing an “X” next to the item number of the Program Component(s) needing REVISIONS to the examples provided on pages 2 through 4 of the *Audit Reference Guide*.

Audit Reference Guide (pages 2-4)

Item 1 (5)	Item 2 (2)	Item 3 (1)	Item 4 (1)	Item 5 (1)
Item 6	Item 7 (1)	Item 8	Item 9 (1)	Item 10 (1)

Eight of the 10 Program Components were identified by at least one jurisdiction as an area needing revision. Six Program Components were identified only once as an area needing revision. Item 1 was identified by five jurisdictions (35.7%) as a Program Component in need of revision. The comments provided in the section below shed some light on potential challenges associated with the Program Components identified as ones needing revisions.

If you identified one or more Program Component(s) needing REVISIONS, what changes would you recommend to the performance areas/competencies listed as examples?

General Comments

- Perhaps a checklist for the auditor is needed and then a percentage is used to determine if the FSIO is meeting #1.
- The reference Guide and all supporting forms (Field Training Manual, etc.) lack a review of the planning and organizing component of an inspection. In some instances, an FSIO may overemphasize one component of the verification of risk based inspection methodology while missing another component entirely. This seems to be an issue that is not captured, especially if you are not seeing any violations in the one component that is being focused on. For example, the FSIO is observed taking numerous compliant temperatures in one display case while neglecting to make observations of a product cooling. There is no direction for how many of those performance areas/competencies listed in the guide for each question need to be deficient for the entire question to be answered "No". Is it one program area/competency, the majority of those that are listed, or would it be based on the severity of which ones are noted deficient (i.e. used risk based inspection methodology vs. correctly used inspection equipment from question 1) etc.? There also is no direction on how to document when an FSIO is neglecting to anticipate opportunities to make risk based observations (i.e. 10 items are observed being cooked during inspection and only 1 cooking temperature is verified by the FSIO).

Uniform Inspection Program Audit Pilot Project Report

ITEM 1

- For Item 1, if the intention is to identify all critical violations (risk factors), a line at the bottom of the list might read "any other critical (or priority or primary) risk factors." Also please identify where non-critical (supportive, secondary, core) risk factors are to be evaluated. Also there are so many components to item 1. I would prefer to break down Item 1 into separate sections.
- Item 1...Maybe a review of how many times a certain violation is marked by an FSIO?
- Example from Item 1.

FSIO used a risk-based inspection methodology to correctly assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food. When the risk factor and/or intervention was applicable and observable during the inspection, the FSIO verified.

I recommend removing "and observable" from the last sentence. Lack of (active) managerial control of FBI risk factors can be identified via discussion even when the FSIO is unable to observe specific processes because they are not happening during the time of inspection.

Recommend changing the word "verified" to "assessed" or "evaluated"

ITEMS 2 and 4

- The differences between Item 2 and Item 4 could be better defined as they both identify documenting code references

ITEMS 2 and 7

- The differences between Item 2 and Item 7 could be better defined as they both identify documenting corrective actions.

ITEM 3

- For Item 3, it would be helpful if examples of "other regulations" were included.
- Item 3...Might offer better examples to assist the accompanying supervisor.

ITEM 5

- Item 5...As stated above, does the previous inspection a good guide or a crutch?

ITEM 9

- Item 9...Maybe a better risk evaluation and maybe some jurisdictions are hindered by funding, staffing or legal guidelines.

ITEM 10

- Item 10...I wonder if this is necessary?

Uniform Inspection Program Audit Pilot Project Report

Section IV – Audit Worksheet – Format Evaluation

The format of the *Audit Worksheet* is user-friendly. (Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

Strongly Disagree

Strongly Agree

1 (2)

2

3 (1)

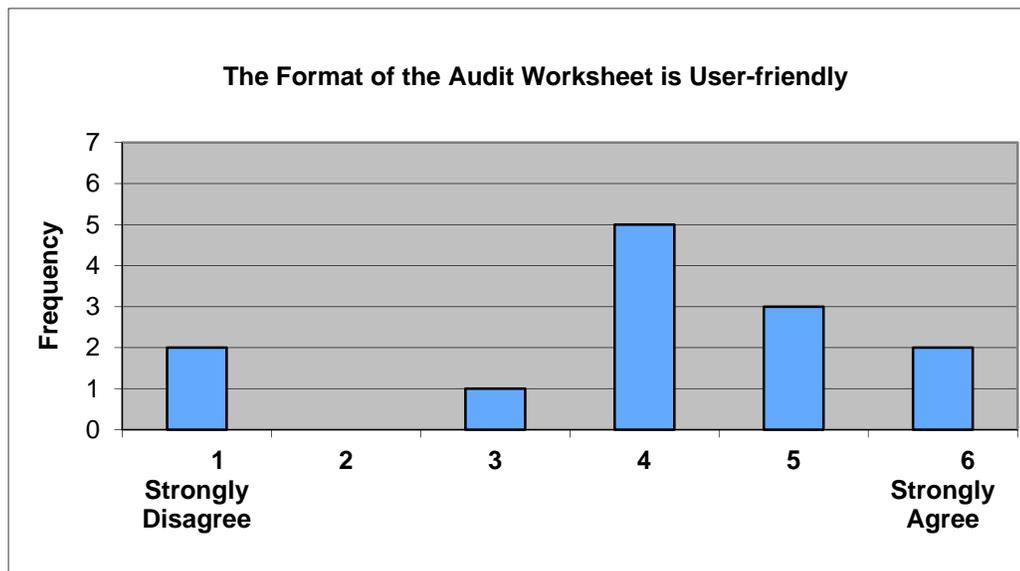
4 (5)

5 (3)

6 (2)

No Response (1)

Responses to this statement ranged from a low of 1 to a high of 6 with a mode (most frequently selected response) of 4. The mean (average) was 3.92 and the median (midpoint) was 4.0. The graphic below depicts the responses:



What improvements would you recommend?

- Try to get complete audit worksheet on one page.
- The flow could be improved by having it match the workflow in the Field Training worksheet. For those program areas/competencies listed in the Audit Reference Guide that have additional reference observations in the Field Training Reference Document, just include the Field Training Reference Document observation list to eliminated the need for cross-referencing.
- Instead of just YES and NO being the only options for each of the 10 items, I would prefer to see some sort of a scale, for example "Always, Often, Sometimes, Rarely" or a numerical scale 1-5, so that I can indicate when something is very good but has room for improvement, or needs a lot of improvement. I want to be able to differentiate between a marginal FSIO and one who did everything great, but may have just missed one or two minor items
- The format was OK but had to adapt it so I could show percentages
- Response options should not be yes and no. Recommendation is to change yes and no to exceeds, meets, needs improvement and does not meet.
- Auditor instructions should indicate that all audit conclusions are supported in the comments section of the form.

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- The audit worksheet jumps around rather than following the natural progression of an inspection e.g. reviewing the previous three reports would be one of the first thing to occur but is not referenced until Item 5. Item 9 references the confirmation of risk category and inspection frequency through file review which would come at the beginning of the process. Would conducting the risk category review during the inspection to confirm the establishment has not eliminated or added processes be a better fit for Item 9?
- We converted the 4 page worksheet to a one page worksheet.
- Combine the worksheet and reference guide. There needs to be examples for the auditor to follow.
- It would be nice to use one form to record the results of all of the audit inspections rather than having a separate form for each inspection.
- List the Performance Areas/Competencies under each Program Component

The header labels are appropriate.

Strongly Disagree

Strongly Agree

1 (2)

2 (1)

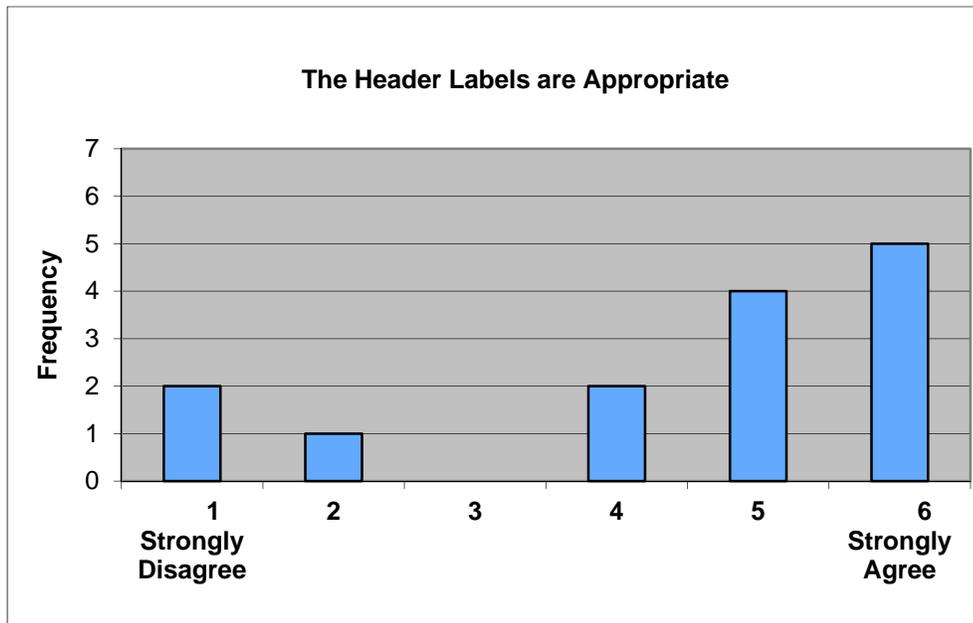
3

4 (2)

5 (4)

6 (5)

Responses to this statement ranged from a low of 1 to a high of 6 with a mode (most frequently selected response) of 6. The mean (average) was 4.43 and the median (midpoint) was 5.0. Nine jurisdictions 64.3% responded with a rating of 5 or above. The graphic below depicts the responses:



Uniform Inspection Program Audit Pilot Project Report

What improvements would you recommend?

- The audit form is too vague for questions 1 and 2 to represent the large number of program areas listed in the Audit Reference Guide and the questions are not really descriptive of those performance areas/competencies indicated in the Guide in many cases. The Audit Worksheet questions (which is what is assumed to be meant by "header labels") could be broken down to a larger number of questions or sub-questions (1a, 1b, 1c) to prevent false indications of program trends or deficiencies (for example, when question 1 may statistically indicate an overall program deficiency, when the deficiencies were actually spread in small numbers over multiple of the program areas/competencies that question 1 represents).
- I would suggest either removing the HACCP/ Variance component from item 9, or else rewording the title of #9 to clarify how this is relevant.
- Use newer Excel template.
- Rather than copying the header labels directly from Standard 4 they should be expanded to better incorporate the examples provided. During an audit we would not expect the auditor to have the examples memorized and flipping between the audit reference guide and the audit worksheet would be awkward.
- I didn't see header labels--just the competency.
- The first statement about the pre-requisite training courses could be separated more from the 10 questions - I put the information for question #1 in the wrong box the first time.

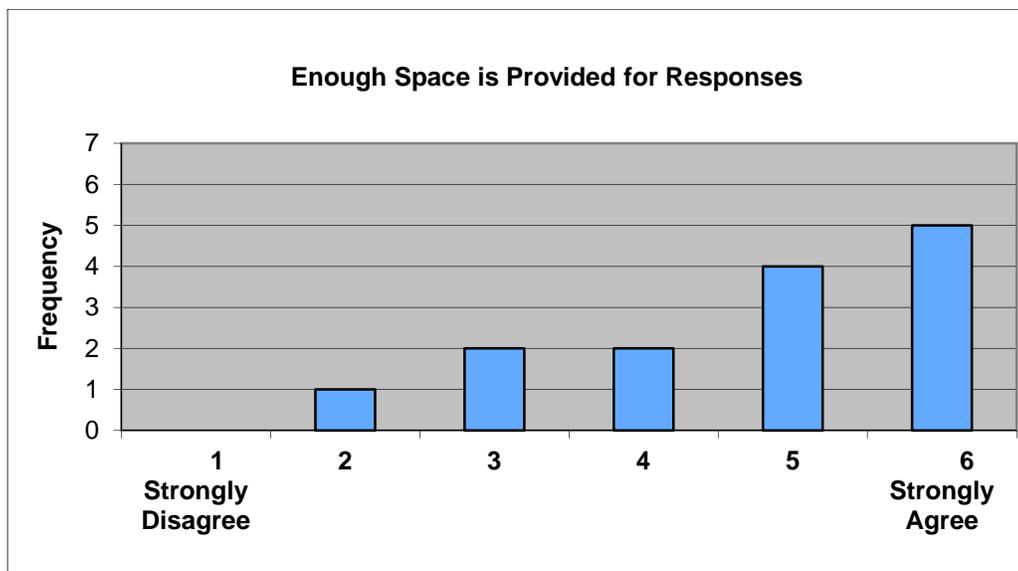
Enough space is provided for responses and comments.

Strongly Disagree

Strongly Agree

1 2 (1) 3 (2) 4 (2) 5 (4) 6 (5)

There was a large spread of responses on this item with the responses ranging from a low of 2 to a high of 6. The mode (most frequently selected response) was 6. The mean (average) was 4.71 and the median (midpoint) was 5. Sixty-four percent (64.3%) of the respondents selected 5 or higher indicating there was enough space provided for responses. The narrative comments in the next section provide additional information regarding this. The graphic below depicts the responses:



What improvements would you recommend?

Uniform Inspection Program Audit Pilot Project Report

- We thought there was too much room--as stated, we converted it to a one page table.
- More space would be better.
- Provide enough space to include the performance areas/competencies under each program area and room to make comments about the performance of the competency.

Is there any general information you believe is important that is MISSING?

Yes (3)

No (11)

The majority of the jurisdictions (78.6%) indicated there was not any general information that was missing. Those that responded "yes" were asked to elaborate and a summary of their responses is provided below.

Please identify information that needs to be ADDED.

- Grade/Scoring space
- There should also be additional guidance on review of the individual Audit Worksheets for trends in the comments (if the overall answer for meeting the category is yes, b/c only one small section was not addressed but was documented in the comments, there should be a way to capture if that same small deficiency was noted among multiple audits). This would be for a competency such as risk based methodology, where 11 different elements are verified (demo of knowledge through consumer advisory). If 1-2 elements are consistently documented as being overlooked (such as cooling and food sources), the trend would still be identified if overall question 1 was answered as "yes" for all audits.
- I would like to see clarified in the general information, how this audit form is different (or how it is to be used differently) from the field training worksheet, since so many of the components are exactly the same.

Is there any general information you believe should be DELETED?

Yes (1)

No (12)

No Response (1)

The majority of jurisdictions (92.3%) that responded felt there was NOT any general information that should be deleted. Those that responded "yes" were asked to elaborate and a summary of their responses is provided below.

Please identify information that should be DELETED.

- The question asking if the FSIO has successfully completed the pre-requisite training courses is not needed, because those FSIOs that have not completed the pre-requisites should not be eligible for auditing because they are "still in training"

Did you modify the Audit Worksheet during the Uniform Inspection Program Pilot?

Yes (4)

No (10)

The majority of the jurisdictions (71.4%) did not modify the *Audit Worksheet* during the pilot project.

Uniform Inspection Program Audit Pilot Project Report

Section V – Audit Results Summary and FSIO Training Plan (*optional form*)

The Audit Results Summary and FSIO Training Plan was included as an optional form a jurisdiction could use during the uniform inspection program audit pilot project. Did your jurisdiction decide to use the form?

Yes (3)

No (11)

Of the 14 jurisdictions, 11 (78.6) did not choose to use the optional Audit Results Summary and FSIO Training Plan during the pilot project. The following section provides some insights as to the factors that impacted the jurisdictions decision not to use the form.

What factors influenced your decision?

- A little too much paperwork. Need to simplify.
- Summarizing in that format helped me tie together information from the audits. In the initial CFP Uniform Inspection Program, I was the sole auditor, this time around there were two of us, so at a quick glance and discussion, we were able to identify areas to develop in our training program.
- Our staff is regularly "Standardized". Any incompetencies observed on routine inspections can be addressed at that time. Staff meets the training requirements of Standard 2 before they are allowed to operate independently.
- The audit results were shared with the FSIO alone and they were allowed to seek additional training with their supervisor at their own discretion. Since this was a pilot project and not all FSIO staff was audited, it was deemed to be unfair to require follow-up with the supervisor on an individual basis when a significant number of staff was not audited. The auditors reviewed general audit findings as a group to determine if trends were present (which would then be identified as program trends for supervisors to address with the entire inspection staff). However, no clear trends were identified for reporting to supervisors in this project.
- We are using the State of Michigan Field Evaluation Form which is more detailed than the federal audit form. Items are broken down into more questions for the in/out/no/na answers. Michigan used the form from the Federal Voluntary Standards to create one for all jurisdictions to use.
- Standardization performed on a yearly basis (2-2-2=6) and a Supervisor's ongoing audit provide the necessary tools to evaluate individual performances.
- Time and resources to dedicate to this.
- A lot of these issues were already instituted and already in place.
- We did not use the document with the FSIO but decided it is important to go through the exercise to evaluate the usefulness of the too.
- We decided that it was too cumbersome. I would still like to see an audit tool that more completely describes what is needed to determine if competency for the program components has been met.
- Form was simple to use and very well structured.
- During the time of this audit, our department lost its' Director. Newly assigned staff to replace the Director was also an FSIO and was part of the audit process. Essentially, there was no supervisor available to address identified competencies in need of improvement.
- Feedback to the FSIO was handled verbally and only minor corrections were needed.
- The Audit Results Summary and Training plan puts the emphasis on individual performance. This should occur in the assessment of training needs and as part of overall performance management of an employee, so that auditing can focus on identifying overall program strengths and weaknesses and improving the program overall.

Uniform Inspection Program Audit Pilot Project Report

Responses from jurisdictions that used the optional Audit Results Summary and FSIO Training Plan

It should be noted that only a minority of jurisdictions that participated in the uniform inspection program audit pilot project opted to use the Audit Results Summary and FSIO Training Plan. The following items contained on the Uniform Inspection Program – Jurisdiction Audit Feedback Form pertain to the use of that form during the pilot project. Since a low number of jurisdictions used the form, the responses presented here should be used as informational references rather than used to draw any definitive conclusions.

The Audit Result Summary and FSIO Training Plan is a useful tool for documenting the audit process and ensuring that additional training is provided to the FSIO for Program Components noted as needing improvement during the establishment file reviews and joint field inspections. (Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

<u>Strongly Disagree</u>						<u>Strongly Agree</u>
1	2	3 (2)	4 (1)	5	6 (3)	
No Response (8)						

Six (42.8%) of the 14 jurisdictions responded this item. The responses ranged from a low of 3 to a high of 6 with a mode (most frequently selected response) of 6.

What improvements would you recommend?

- Maybe developing a spreadsheet so that you can see all the results summarized in one shot.
- More examples of good practices and maybe include more in depth instructions to the supervisor on how to "score" the audit sheet. I feel that Standard 4 should be re-worked and to get individual interpretations out of the process. Many of these same issues are covered in STD 2 and Std 9.
- None

The format of the Audit Results Summary and FSIO Training Plan is user-friendly

<u>Strongly Disagree</u>						<u>Strongly Agree</u>
1	2	3 (1)	4	5 (3)	6 (2)	
No Response (8)						

Six (42.8%) of the 14 jurisdictions responded this item. The responses ranged from a low of 3 to a high of 6 with a mode (most frequently selected response) of 5.

What improvements would you recommend?

(None of the pilot jurisdictions submitted comments for this item)

Uniform Inspection Program Audit Pilot Project Report

The header labels on the *Audit Results Summary and Training Plan* are appropriate.

Strongly Disagree

1

2

3 (1)

4

5 (3)

Strongly Agree

6 (2)

No Response (8)

Six (42.8%) of the 14 jurisdictions responded this item. The responses ranged from a low of 3 to a high of 6 with a mode (most frequently selected response) of 5.

What improvements would you recommend?

(None of the pilot jurisdictions submitted comments for this item)

Enough space is provided for responses and comments on the form.

Strongly Disagree

1

2

3 (1)

4

5 (4)

Strongly Agree

6 (1)

No Response (8)

Six (42.8%) of the 14 jurisdictions responded this item. The responses ranged from a low of 3 to a high of 6 with a mode (most frequently selected response) of 5.

What improvements would you recommend?

- When completed electronically the form adjusts and we would check mark 6 (Strongly Agree).
- When completed with pen to paper there is not sufficient room on the form and we would check mark this question 1 (Strongly disagree).
- More space will be needed because we had to use an extra sheet of paper.

Is there any general information that is missing?

Yes (2)

No (4)

No Response (8)

Please identify information that needs to be ADDED.

- A date should be established for completing the required re-training. When re-training has been completed a date should be designated for a follow-up audit.
- Adding a column with a timeframe on when the specific improvement will need to be completed.

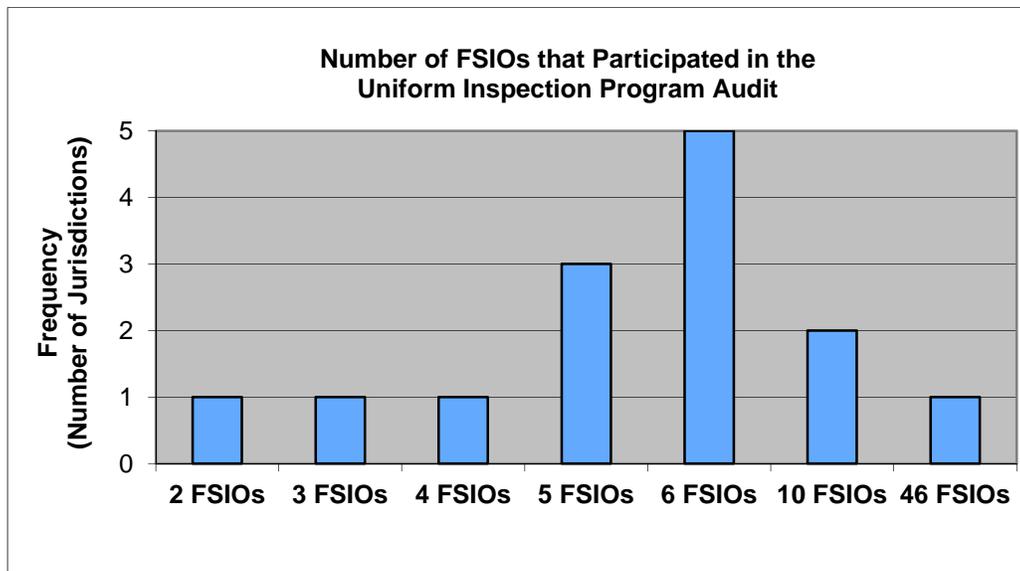
Uniform Inspection Program Audit Pilot Project Report

Section VI – Uniform Inspection Program Audit Pilot Project Results

How many FSIOs were assessed as part of the jurisdiction’s uniform inspection program audit?

- 2 - 1
- 3 - 1
- 4 - 1
- 5 - 3
- 6 - 5
- 10 - 2
- 46 - 1

A total of 76 FSIOs participated in the Uniform Inspection Program Audit Pilot Project. The number of FSIO’s from each individual jurisdiction ranged from one jurisdiction that had two FSIO participating to one jurisdiction that had 46 FSIOs participating. More jurisdictions (5) had six FSIOs participating 35.7% than any other number of FSIOs participating. The graphic below depicts the responses.

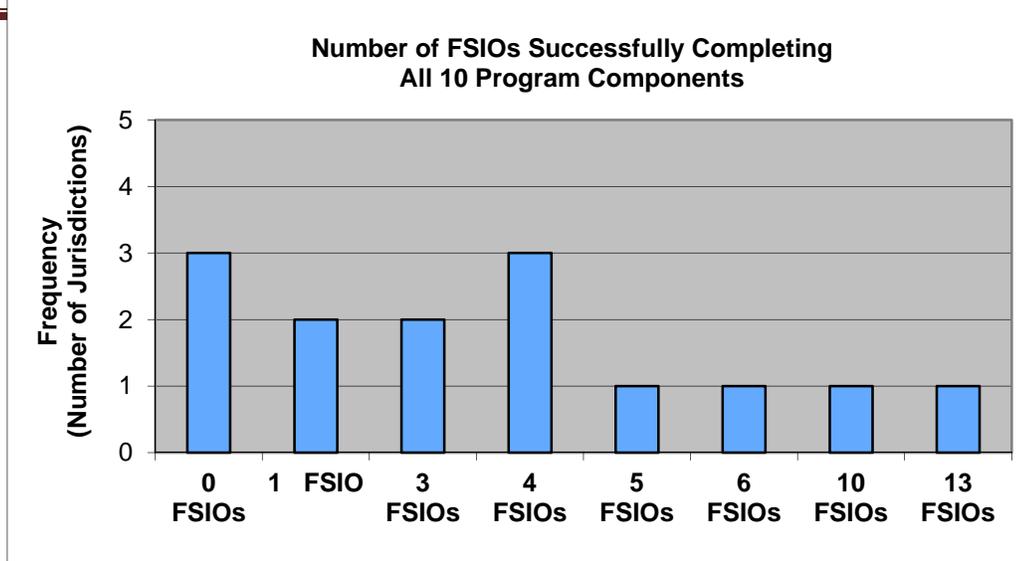


How many FSIOs successfully performed all 10 Program Components during the Audit Process?

- 0 - 3
- 1 - 2
- 3 - 2
- 4 - 3
- 5 - 1
- 6 - 1
- 10 - 1
- 13 - 1

A total of 42 FSIOs successfully performed all 10 Program Components during the audit pilot project. This represents 55.3% of the total number of FSIOs participating in the audit process. The number of FSIO’s successfully performing all 10 Program Components process ranged from zero (in 3 jurisdictions) to thirteen FSIOs in 1 jurisdiction. The graphic at the top of the next page depicts the responses.

Uniform Inspection Program Audit Pilot Project Report



Within your jurisdiction, who served as the “auditors” (individuals responsible for assessing FSIOs as part of the uniform inspection program audit)?*

A. Retail Food Program Managers (2)	D. Senior Food Safety Inspection Officers (4)
B. The Supervisors of the Food Safety Inspection Officer (3)	E. Quality Assurance/Quality Control Officers (2)
C. Training Officers (2)	F. Other – (Please described in the box provided below)

*** Total exceeds 14 because two jurisdictions listed more than one answer**

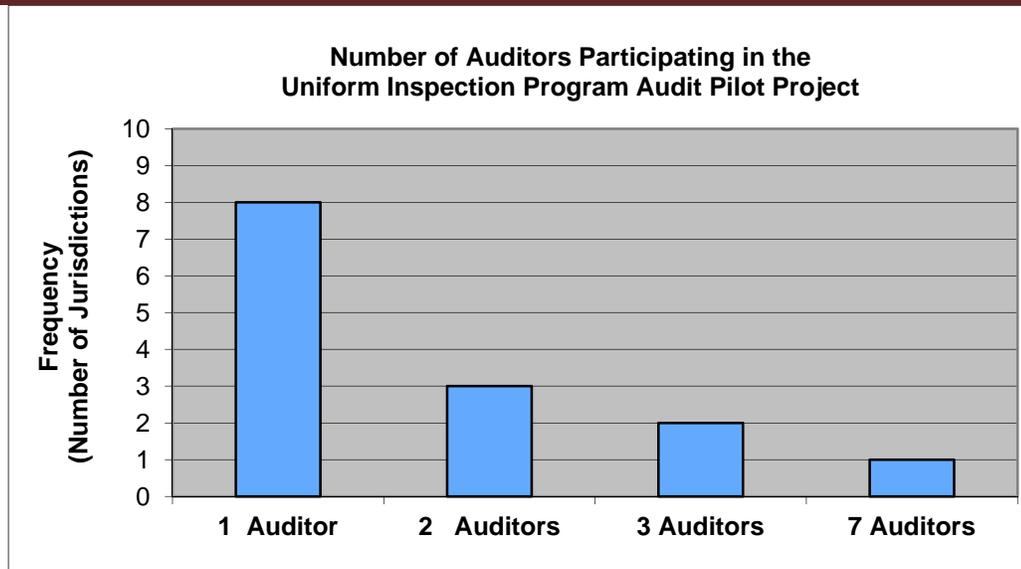
- The auditors are experience FSIOs, but not the most senior FSIOs on staff. These experienced FSIOs are also field inspection trainers as part of their job description (as are all FSIOs of that level in this program). They were chosen as auditors based on their ability to articulate their observations to the auditees. Only one auditor had completed formal auditor training designed specifically to impart skills on auditing field inspections.
- A, B, and C are all the same person (me) for our jurisdiction.
- The reason I put zero for completing all ten components was that the average was 80% and no one received a 100%
- FDA Certified Retail Standard and Evaluation Officer
- Registered Sanitarian knowledgeable with the audit process, but not manager of the program.

How many “auditors” (individuals responsible for assessing FSIOs as part of the uniform inspection program audit participated in the pilot project?

1 - 8
 2 - 3
 3 - 2
 7 - 1

A total of 27 “auditors” participated in the Pilot Project. The number of auditors participating within each jurisdiction ranged from a low of one (57.1% reported using one auditor) to a high of seven. The graphic at the top of the next page depicts the responses.

Uniform Inspection Program Audit Pilot Project Report



Was there more than one auditor per Food Safety Inspection Officer?

Yes (1)

No (13)

Only one (7%) of the 14 jurisdictions reported using more than one auditor per FSIO. In this one instance, FSIOs did not report any differences between the auditors (per the item below).

If you answered YES to the question above, did Food Safety Inspection Officers report any differences between the auditors related to how the audit was conducted?

Yes (0)

No (1)

If differences were noted, provide specific examples?

(None reported)

Uniform Inspection Program Audit Pilot Project Report

The uniform inspection program audit process is designed in such a way as to facilitate a strengths-weaknesses assessment of our jurisdiction regulatory retail food protection inspection program. (Please place an "X" in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

Strongly Disagree

1

2 (2)

3 (1)

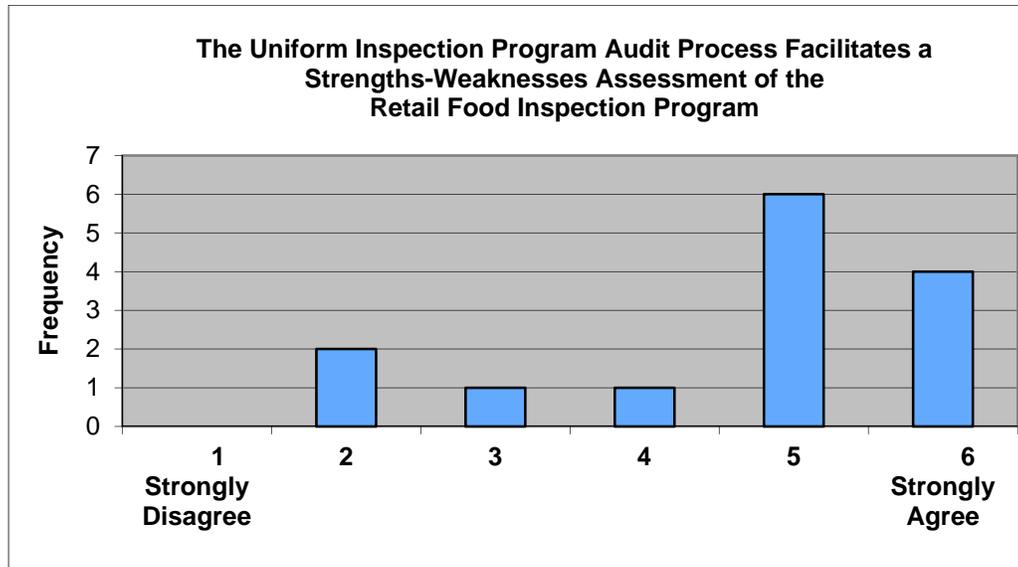
4 (1)

5 (6)

Strongly Agree

6 (4)

The responses ranged from a low of 2 to a high of 6 with a mode (most frequently selected response) of 5. The mean (average) was 4.64 and the median (midpoint) was 5. Seventy-one percent (71%) of the respondents selected 5 or higher agreeing that the Uniform Inspection Program audit process is designed in such a way as to facilitate a strengths-weaknesses assessment of a jurisdiction's regulatory retail food inspection program. The graphic below depicts the responses.



What factors influenced your decision?

- Shorten length of all forms, if possible.
- It is a very useful tool. The area of concern for me, for one is doing enough audits to get representative samples to determine what change need to done. I feel that many FSIO feel that the ATN process is a pass or fail, even when they are repeatedly told it is not. Staff gets very nervous having someone evaluate them in the field. This may be an internal problem where there has not been any type of mentorship and/ audit program in the food inspection program. Also, how/when is it determined that it is the training program or an employee's lack to follow through with the training.
- Lincoln Lancaster County Health Department is evaluated by the NE Department of Agriculture, Bureau of Dairies and Foods every 5 years. Perhaps there can be a means to incorporate their evaluation of our program into Standard 4.
- The current design of the questions on the Audit Worksheet would result in a lot of individual interpretation during application in the field that would lead to inconsistent audit reporting and subsequently misleading program audit results. Specific areas resulting in individual interpretation are the potential overlap between audit questions and with other Voluntary Program Standards that is implied by the program areas/competencies listed in the Audit Reference Guide (see Section III question 1 for additional comment). The lack of auditor qualifications and marking instructions (such as when enough non-observations or deficiencies in individual program areas/competencies would warrant a "No" as opposed to a "Yes") would also lead to inconsistent application in the field and mis-representative program reporting.

Uniform Inspection Program Audit Pilot Project Report

On average, how long did it take to complete an audit of the Pre-Inspection Establishment File Review?

Half of the participating jurisdictions indicated it took less than 30 minutes for the FSIO to conduct a Pre-Inspection Establishment File Review while the other indicated the review tool between 31 and 60 minutes. The table below summarized the responses to this question:

Average time it took a FSIO to conduct a Pre-Inspection Establishment File Review					
		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	less than 30 minutes	7	50.0	50.0	50.0
	31 - 60 minutes	7	50.0	50.0	100.0
	Other	0	0.0	0.0	100.0
	Total	14	100.0	100.0	

On average, how long did it take to complete the audit of a joint field inspection (SINGLE INSPECTION) using the Audit Worksheet (actual time in hours – including inspection, completion of the inspection report, and discussion of the inspection report with the person in charge)? Do NOT include travel time to & from the establishment.

As the table below indicates, the half of jurisdictions (n=7, 50%) indicated it took between 61 and 120 minutes (one to two hours) for an FSIO to complete a single on-site joint field inspection while using the Audit Worksheet. One jurisdiction reported it took four hours and one reported it took 5 hours.

Average time it took to complete an on-site joint field-training inspection					
		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	less than 60 minutes	0	0.0	0.0	0.0
	61 - 120 minutes	5	35.7	35.7	35.7
	121 - 180 minutes	7	50.0	50.0	85.7
	Other (see below*)	2	14.3	14.3	100.0
	*4 hours – (1)				
	*5 hours – (1)				
	Total	14	100.0	100.0	

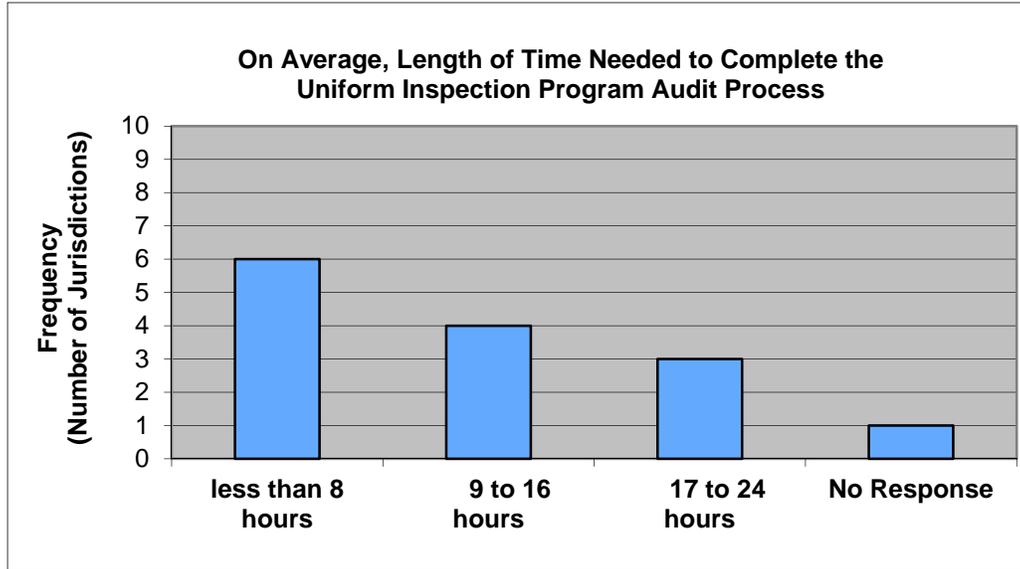
On average, how long did it take to complete the audit process for each individual FSIO? (Include the orientation process; establishment file reviews; actual inspection time; review of the audit reports with the FSIO; and completion of all inspection program audit documents/worksheets.)

The table below contains a frequency distribution of the responses regarding the average time for the FSIO to complete the audit process. The responses varied greatly from less than 8 hours to 17 - 24 hours. Ten (76.9%) of the 13 jurisdiction submitting responses indicated that the audit process was completed in less than 16 hours.

Average time for the FSIO to complete the Audit Process				
		Frequency	Percent	Cumulative Percent
Valid	less than 8 hours	6	42.9	42.9
	9 to 16 hours	4	28.6	71.5
	17 to 24 hours	3	21.4	92.9
	25 to 32 hours			
	33 to 40 hours			
	Other (see below*)			
	No Response	1	7.1	100.0
	Total	14	100.0	

Uniform Inspection Program Audit Pilot Project Report

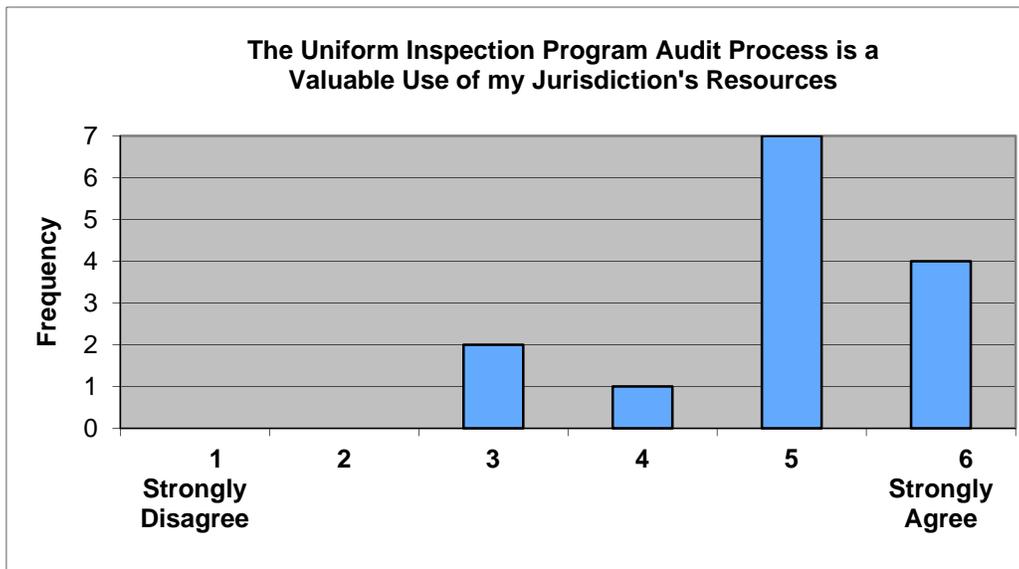
The graphic below depicts the response from the previous page pertaining to the average time needed to complete the audit process with FSIOs.



The uniform inspection program audit process is a valuable use of my Jurisdiction’s resources (e.g., time; staff; finances).

Strongly Disagree 1 2 3 (2) 4 (1) 5 (7) 6 (4) Strongly Agree

The responses ranged from a low of 3 to a high of 6. The mode (most frequently selected response) was 5. The mean (average) was 4.93 and the median (midpoint) was 5. A total of 11 (78.6%) jurisdictions selected either a 5 or 6 indicating agreement that the Uniform Inspection Program audit process was a valuable use of the Jurisdiction’s resources. The graphic below depicts the results of this item.



Uniform Inspection Program Audit Pilot Project Report

Explain, why?

- Time consuming , but in the end gave us a very good understanding of the “big picture” of our program.
- The program is very useful. Even with the limited number of FSIO's audits we were able to find some areas in the inspection program that may need reviewed or beefed up in our training program.
- Lincoln Lancaster County Health Department is evaluated by the NE Department of Agriculture, Bureau of Dairies and Foods every 5 years. Perhaps there can be a means to incorporate their evaluation of our program into Standard 4.
- For our program, there is a limited set of resources for the evaluation of field inspections. The audit process would overlap with the standardization process, which is already a challenge to complete with current resources. It seems that there needs to be more clarification to the auditor and the auditee on the difference of the audit process from the standardization process to avoid getting bogged down in an exercise of evaluating very single observation (or lack thereof) from the audit inspection. Another option may be development of a tool to link portions of the current standardization process with the audit process to reduce the resources necessary since both the program audit and standardization are necessary. An example would be to have the audit conducted by the standard (for those programs that complete standardization within the agency) and the risk based inspection marking observations from the standardization documentation could be used as support for marking on questions 1 and 4 of the Audit Worksheet.
- We already complete audits/ reviews of staff to work on uniformity for Michigan accreditation so this uniform inspection program process was not anything new and different.
- Integrated nicely with our program and availability of Quality Assurance Specialist that are strategically placed around the State to handle this type of assessment as part of their responsibilities. Program evaluation is unique as another tool assessment for how the program is running collectively and has not put a strain on our resources. Our program initially started over 3 years ago and have benefited from the results in looking at our program collectively. We are in the process of addressing one of the deficiencies found during our first 3 year audit.
- Our program has a policy that each inspector is visited by their supervisor at least twice a year. Standard four can easily be interpreted as doing a standardization. I feel Std 4 should be more distinctive. Maybe a review of the data collected from FSIO's might be more meaningful.
- We modified it and will use our modification to help with the documentation for attainment of Standard 4.
- Because we have been able to develop a quality assurance program that has helped identify deficiencies or gaps within our division. As a result of this process, we have been able to implement a program to detect and deter problems noted during the audits and file reviews thus ensuring that we are using proactive rather than reactive management strategy. Having a division quality assurance for the first time has helped the manager and supervisor identify the training needs for different employees thus helping them to become better FSIO's.
- The process really helped our department to identify our programmatic weaknesses. While we were not able to fully improve upon FSIO competencies (due to loss of supervisor), the audit was useful for planning future program goals and objectives as we move forward with new leadership.
- We need a formalized process to evaluate our program after initial training has been completed.
- With the modifications that we made and the potential for ongoing improvements to the audit process as we continue to use and refine it.

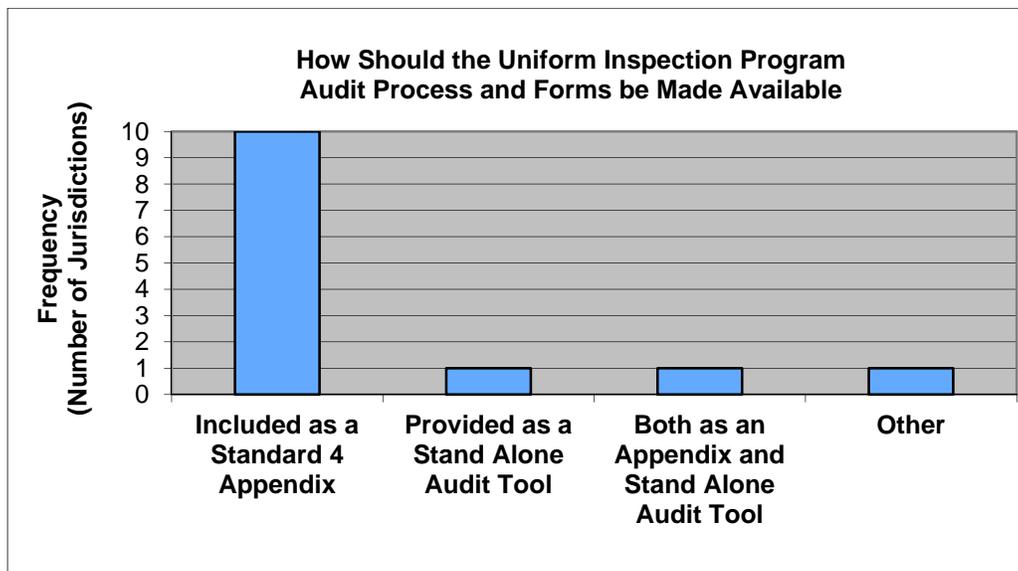
If you indicated in Question #11 that the Uniform Inspection Program Audit process was a valuable use of your

Uniform Inspection Program Audit Pilot Project Report

Jurisdiction’s resources, how should the audit documents and forms be made available to other regulatory retail food protection programs?

A. The Uniform Inspection Program Audit and Forms should be included as an example template in an Appendix to Standard 4 – Uniform Inspection Program, <i>FDA Voluntary National Retail Food Regulatory Program Standards</i> (10)	B. The Uniform Inspection Program Audit and Forms should be made available as a resource document on FDA’s web site as a stand alone piece. The audit process and forms should not be included as part of the <i>FDA’s Voluntary National Retail Food Regulatory Program Standards</i> (1)
C. Other – <i>Please describe in the box provided below</i> (1)	D. B and C (1)
No Response (1)	

Ten (76.9%) out of the 13 jurisdictions that responded indicated that the Uniform Inspection Program Audit and Forms should be included as an example template in the Appendix to Standard 4 – Uniform Inspection Program, FDA Voluntary National Retail Food Regulatory Program Standards. The graphic below depicting these results is followed by specific comments related to this item.



- Much of the ability to audit is the fact that you are auditing against a set protocol and training regime. If the program does not also work to achieve std 2 and std 3, the feedback from this audit is not useful since the variation in results may be from many different sources (training development issues, training delivery issues, individual inspector implementations issues, supervisory/management issues, etc.), thereby limiting the ability to adequately identify and/or address the root cause of the trend noted in the program audit.
- Many states that do not have accreditation standards could benefit from the use of this tool.
- I believe the documents should be made available in both formats.
- They should be available as an appendix to standard 4 for jurisdictions enrolled in VRFRPS.
- The standalone document should be made user friendly for jurisdictions not enrolled in the VRFRPS e.g. eliminate the reference to standards 2 and 4.
- Consider creating a separate document/report that specifically speaks to Quality Standards for Food Protection Programs and include this as one tool that could be used to audit/assess quality.

Uniform Inspection Program Audit Pilot Project Report

Section VII – Uniform Inspection Program Audit Pilot – Additional Comments

General Comments

- Please remember that most retail inspection programs are local. Ensure audit program is very sensitive to local pressures, etc.
- Using these forms and completing inspections with staff show Michigan evaluation of staff is on target with federal standards
- The process has been presented in a very simplified manner and I would encourage other jurisdictions to participate in this audit process using the approach outlined by the CFP committee. Managers can use this audit process as a way of identifying the problems and devising strategies to deal with them effectively. In Taney County Health Department - Environmental Services Division, we have been able to implement a quality assurance program that utilizes the 10 inspection program areas. We anticipate on conducting the onsite inspections and file reviews biannually to ensure that our workforce is effective in delivery of services to the public.
- It would be very helpful if there were sample policies/procedures available for jurisdictions to utilize and build from rather than having to start from scratch. Sample inspection reports would also be helpful as we are looking at revising ours so that the risk factors will be more routinely addressed for each inspection.

Audit Worksheet

- I find the field inspection worksheet for standard 2 to be very helpful, more so than this form. I don't really understand how this is significantly different from the standard 2 worksheet. For the first several joint inspections, I actually thought I was supposed to be using the field inspection worksheet and didn't realize that there was a separate form for the "audit." Even after realizing I was using the wrong form initially, I preferred to continue using the standard 2 worksheet in addition to the pilot project audit worksheet, since the field training worksheet gives so much more information and breaks everything down.
- I would suggest some rearranging to make things flow better. Item 5 and Item 8 seem to be very closely related and should be next to each other or combined into one item. If I were setting this sheet up, I would arrange the 10 items as follows to reflect a more linear thought process as follows (item number as it appears on the Audit Worksheet is in parenthesis):
 - (1) compliance status
 - (3) interpret and apply laws
 - (5) review past inspections
 - (8) long term control
 - (7) corrective action
 - (6) compliance & enforcement
 - (9) risk category/ inspection frequency
 - (4) proper codes
 - (2) clear report
 - (10) file reports

Uniform Inspection Program Audit Pilot Project Report

- If I were setting this sheet up, I would arrange the 10 items as follows to reflect a more linear thought. The process has been presented in a very simplified manner and I would encourage other jurisdictions to participate in this audit process using the approach outlined by the CFP committee. Managers can use this audit process as a way of identifying the problems and devising strategies to deal with them effectively. In Taney County Health Department - Environmental Services Division, we have been able to implement a quality assurance program that utilizes the 10 inspection program areas. We anticipate conducting the onsite inspections and file reviews biannually to ensure that our workforce is effective in delivery of services to the public.

Audit Reference Guides

- The "Guide" is of little assistance on helping the auditor interpreting "Yes" or "No" on the Audit worksheet item #1. There are, in our case, too many Risk Factors (27) and Good Retail Practices (27) to consider and then determine if item #1 should be a YES or NO.
- "Revised" Audit Reference Guides that were used by auditors are attached. The numbers reference the sections of the Abbreviated Field Training Worksheet Reference Documents sections. One auditor completed the Abbreviated Field Training Worksheet and then used the cross reference numbers to cut and paste comments into corresponding Audit Worksheet sections (with use of the revised Audit Reference Guide).

Uniform Inspection Program Audit Pilot Project Report

Pilot Project Findings and Conclusions

The findings and conclusions for the pilot project will be presented in two parts:

Part I – Uniform Inspection Program Audit Process and *Guides*; and

Part II – *Audit Worksheet*

Part I – Uniform Inspection Program Audit Process and Guides

A solid majority (85.7%) of the pilot participants agreed that the *Uniform Inspection Program Audit* process was a valuable use of their jurisdiction's resources. Most respondents were complimentary to the process and identified it as a "good start." In a minority opinion, two jurisdictions identified the process as time consuming with too much paperwork and a potential drain on employee and monetary resources.

The majority of respondents (78.6%, n=11) indicated that the instructions given in the *Guide to the Uniform Inspection Audit Process* were sufficient for understanding and implementing the training process. However, some very good suggestions were made for clarifying and improving several sections of the *Guide*. For example, a significant number of jurisdictions noted that the *Guide* did not contain the level of detail and step-by-step instructions that is found in the Standard 2 – Field Training Manual. Some jurisdictions recommended revisions to the content to ensure the intended use is clear and terminology remained consistent.

In addition, the responses indicated support for a recommendation to more closely align the Standard 4 Program Elements with the Standard 2 Performance Elements. This appears to be one of the underlying factors for a majority of jurisdictions indicating that Program Components were "missing" (61.5%, n=8); difficult to assess (66.7%, n=8); or difficult for the FSIO to demonstrate (71.4%, n=10). The majority of these respondents (80%, n=10) agreed that the *Uniform Inspection Program Audit* process is designed to facilitate a strengths-weaknesses assessment of the jurisdiction's retail food protection program.

A majority (57.1%, n=8) of the pilot jurisdictions only used one auditor to conduct the all assessments of FSIOs during the two joint inspections. Of the jurisdictions that used multiple auditors, only one used more than one auditor to assess an individual Food Safety Inspection Officer's performance of the 10 Program Elements. The pilot jurisdictions reported selecting their auditors from a variety of positions within their retail food inspection program including: Senior Food Safety Inspection Officers (n=4); Supervisors of the Food Safety Inspection Officer (n=3); Training Officers (n=2); Retail Food Program Managers (n=2), and Quality Assurance/Quality Control Officers (n=2).

Eleven of the pilot jurisdictions (78.6%) agreed that a minimum of two retail food establishment file reviews and joint field inspections for each FSIO is the appropriate number for completing a uniform inspection program audit. Two jurisdictions indicated that a minimum of two file reviews and field inspections were not enough. One of the primary reason cited centered on a lack of sufficient information to conduct an assessment of root causes that may be associated with gaps in the administrative process and training program supporting the retail food inspection program. Slightly over fifty five percent (55.3%, n=42) of the FSIOs successfully performed all 10 Program Elements during the audit process.

Uniform Inspection Program Audit Pilot Project Report

When the pilot jurisdictions were asked how long it took for the FSIO to complete the Uniform Inspection Program Audit process, the responses varied from less than 8 hours to 24 hours. The majority of the respondents (76.9%, n=10) indicated the average time for the FSIO to complete the audit process was less than 16 hours.

Some pilot jurisdictions encouraged revision of the Standard 4 criteria so that the 10 Program Elements reflect a more linear process and can be directly associated with Performance Elements and competencies contained in the Standard 2 – FSIO Field Training Plan. In addition, a few jurisdictions noted that the audit process intended to assess inspection program strengths and weaknesses tends to focus too much on an assessment of the FSIO’s individual performance. It was reported that inspection staff participating in the pilot project viewed the audit process as a mechanism to evaluate their own performance rather than a tool for determining program strengths-weaknesses. One jurisdiction recommended that process for determining compliance with the Standard 4 criteria be re-examined so that it more accurately reflects a quality assurance review of the inspection program rather than being solely based on the performance of staff during inspections.

Part II – Audit Worksheet

Only half the jurisdictions (50.0%, n=7) agreed that the 10 Program Elements sufficiently address inspection uniformity, inspection quality, inspection frequency, and uniform application of the regulatory jurisdiction’s retail food safety regulations and administrative procedures. A majority of the jurisdictions (78.8%, n=11), however, indicated the competencies/criteria listed as examples under each program component were helpful to the audit process. Recommendations for improving the *Audit Worksheet* included:

- Developing a comprehensive instruction guide to accompany the reference sheet similar to that provided for the Standard 2, CFP Field Training Plan;
- Organizing the 10 Program Components in a linear format to better reflect the sequence encountered during the inspection process;
- Aligning the 10 Program Elements with the Performance Elements and competencies identified in the Standard 2, CFP Field Training Plan;
- Revising the 10 Program Elements to clarify the process for assessing a complex area such as observations of risk factors versus simpler areas such as the timely filing of inspection reports and other documentation;
- Reexamining the weighting of the 10 Program Elements based on their public health significance; and
- Expanding the quality assurance assessments to include a review of other Program Elements besides the field inspections, such as an analysis of the type and frequency of out of compliance observations.

Feedback related to format of the *Audit Worksheet* varied greatly. Suggestions for improving the format included:

- Providing a numerical scale assessment rather than an all or nothing Yes / No determination for each of the Program Elements.

Uniform Inspection Program Audit Pilot Project Report

- Providing a comment section to note specific observations made of the FSIO performance for each of the Program Elements;
- Combine and streamline the various Audit Guides / Reference documents that support the use of the Audit Worksheet; and
- Providing a linear presentation of the 10 Program Elements; and
- Providing enough space to include the competencies that pertain to each of the Program Elements.

Uniform Inspection Program Audit Pilot Project Report

Pilot Jurisdictions Recommendations to the Conference

Based on the findings and conclusions from the pilot project, the following summarizes recommendations received from participating jurisdictions for enhancing the effectiveness of the *Uniform Inspection Program Audit* process, *Audit Worksheet*, and *Audit Guides*.

1. Revise the *Guide to Conducting a Uniform Inspection Program Audit*. Some changes that should be considered include:
 - Developing a more comprehensive guidance document similar to the CFP Field Training Manual contained in Standard 2 that explains the criteria for each component of the audit process;
 - Clarifying the process for selecting the establishments that are to be used for the file and field review.
 - Clarifying the parameters for what is to be included as part of the establishment file review;
 - Providing expanded guidance on the auditor's qualifications, role, and responsibilities, and.
2. The 10 Program Elements contained in Standard 4 need to be aligned with the Performance Elements and competencies identified in the Standard 2 – CFP Field Training Plan. This alignment would necessitate revisions to the *Guide to Conducting a Uniform Inspection Program Audit*, *Audit Worksheet*, and *Audit Reference Guide*.
3. The presentation of the 10 Program Elements contained in the Standard 4 criteria, the *Guide to Conducting a Uniform Inspection Program Audit*, and *Audit Worksheet* need to be presented in a linear format to reflect a logical sequence to the inspection process.
4. The information contained in the *Audit Reference Guide* should be incorporated into the *Guide to Conducting a Uniform Inspection Audit* to eliminate the need for multiple documents.
5. The weighting/assessing of each of the 10 Program Elements is not consistent. Some Program Elements, such as the one that relates to assessing risk factors, are much more complex than others, such as the timely filing of reports and documents. A more equitable, objective assessment system should be established for the audit process.
6. The Standard 2 – CFP Field Training Plan builds in the flexibility for a jurisdiction to include performance elements / competencies that are important to their program. The Standard 4 criteria and associated audit worksheet and guides are more rigid in their format. The audit process and worksheet should be designed to allow jurisdictions the flexibility for assessing inspection Program Elements that are specific to their retail food protection program.
7. The field inspection assessment conducted as part of Standard 4 seems to take an all or nothing approach. Item 1 for examples pertains to an assessment of observations of risk factors and public health interventions – eleven different categories. If an inspector fails to make an observation of just one item in this category, this Program Element is not met. This level of performance is higher than what is used for FDA Food Code Standardizations. The assessment protocol for Performance

Uniform Inspection Program Audit Pilot Project Report

Elements needs to be re-evaluated and better guidance provided as to what constitutes an effective performance measurement.

8. Some of the Program Elements are very subjective in nature and do not contain definitive performance measurements, such as producing legible reports. The Program Elements contained in Standard 4 should have defined performance measurements that are quantifiable.
9. The *Audit Worksheet* should include a comment section so that a more detailed description can be provided as to the observations made of an inspector's performance of any one of the 10 Program Elements.

Uniform Inspection Program Audit Pilot Project Report

Next Steps

The CFP CFSRP Work Group conducted conference calls to discuss the data results and feedback from pilot project jurisdictions. Based on these conference calls, the Work Group reached consensus that the pilot project contained significant recommendation pertaining to the Standard 4 – Uniform Inspection Program criteria and should be forwarded to the U.S. Food and Drug Administration (FDA). FDA provides administrative oversight of the *Voluntary National Retail Food Regulatory Program Standards* and would be the lead entity for assessing any potential changes to the Standard 4 criteria.

The CFP CFSRP Work Group has prepared two issues related to the *Uniform Inspection Program Audit Pilot Project* for deliberation at the April 2012 Conference for Food Protection in Indianapolis, IN. The first issue recommends that the Conference accept this pilot project summary report and recognize the 14 State and local jurisdictions listed in the Acknowledgements section at the beginning of this report for their contributions to the success of the pilot project and recommendations for enhancing the quality assurance component contained within Standard 4.

The second issue recommends that the Conference send a letter to FDA requesting that they:

- Review for potential revisions to the Standard 4 – Uniform Inspection Program criteria and field inspection review process, the recommendations contained in this pilot project report.
- Obtain input and feedback from the CFP Program Standards Committee as part of FDA's review of the recommendations contained in this pilot project report.

Appendices

APPENDIX A – Jurisdiction Feedback Form on the Audit Process and Forms

APPENDIX B – CFP *Guide to the Uniform Inspection Program Audit*

APPENDIX C – CFP Uniform Inspection Program *Audit Worksheet*

APPENDIX D – CFP Uniform Inspection Program *Audit Reference Guide*

APPENDIX E – CFP Uniform Inspection Program *Audit Results Summary and FSIO Training Plan*

**CONFERENCE FOR FOOD PROTECTION (CFP)
UNIFORM INSPECTION PROGRAM AUDIT
PILOT PROJECT**

JURISDICTION FEEDBACK ON THE AUDIT PROCESS AND FORMS

Name of Jurisdiction		Type <i>(place an "X" in the appropriate box)</i>		
		<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input type="checkbox"/> County
		<input type="checkbox"/> District	<input type="checkbox"/> Tribal	<input type="checkbox"/> Other Specify _____
Jurisdiction Mailing Address:			City	State
				Zip
Contact Person for the Jurisdiction		Contact Phone #	Contact Fax #	Contact E-mail Address
Report Prepared By: <i>(if different from the Contact Person for the Jurisdiction)</i>		Preparer Phone #	Preparer Fax #	Preparer E-mail Address

(Place an "X" in the space adjacent to the most appropriate response for each question)

**SECTION I
JURISDICTION DEMOGRAPHICS**

1. What is the population living within your Jurisdiction?

- A. less than 25,000 B. 25,000 to 49,999 C. 50,000 to 99,999
 D. 100,000 to 249,999 E. 250,000 to 499,999 F. 500,000 or above

2. What is your Jurisdiction’s total number of retail food and foodservice establishments under permit?

- A. less than 100 B. 101 to 500 C. 501 to 1,000
 D. 1,001 to 3,000 E. 3,001 to 6,000 F. 6,001 or above

3. How many Food Safety Inspection Officers are employed by your Jurisdiction with FULL TIME (i.e., 100%) responsibility in the food safety program?

- A. less than 4 B. 4 to 8 C. 9 to 12
 D. 13 to 20 E. 21 to 30 F. 31 or more

4. How many Food Safety Inspection Officers are employed by your Jurisdiction with responsibilities in other environmental health program areas in addition to their retail food protection duties?

- A. less than 4 B. 4 to 8 C. 9 to 12
 D. 13 to 20 E. 21 to 30 F. 31 or more

(Section I – continues on the next page)

SECTION I
JURISDICTION DEMOGRAPHICS

(Section I – continued from the previous page)

5. If your Food Safety Inspection Officers have responsibilities in other environmental health program areas, on average, how much of their annual work plan is dedicated to the retail food protection program?

- A. less than 10% B. 10% to 29% C. 30% to 49%
 D. 50% to 69% E. 70% to 89% F. 90% or more

6. Is your Jurisdiction AWARE of the FDA Voluntary National Retail Food Regulatory Program Standards?

- Yes No

7. Is your Jurisdiction ENROLLED in the FDA Voluntary National Retail Food Regulatory Program Standards?

- Yes No

8. If enrolled in the FDA Voluntary National Retail Food Regulatory Program Standards, has your jurisdiction MET all the Standard #2 – Trained Regulatory Staff criteria?

- Yes No

9. Does your Jurisdiction have a written field training plan that identifies the specific job performance elements and competencies a FSIO is expected to demonstrate during foodservice and retail food inspections?

- Yes No

10. If your answer to Question #9 above is YES, please identify the type of written FSIO field training plan that is in use within your jurisdiction.

- A. The CFP Field Training Plan as presented in Appendix B-2, Standard #2 – Trained Regulatory Staff, *FDA Voluntary National Regulatory Retail Food Program Standards* C. A Field Training Plan developed in-house that meets the intent and scope of the CFP Field Training Plan
 B. A customized version of the CFP Field Training Plan, Appendix B-2, Standard #2 – Trained Regulatory Staff that is specific to our jurisdictions retail food inspection protocol D. Other – Please describe in box provided below

11. If enrolled in the FDA Voluntary National Retail Food Regulatory Program Standards, has your Jurisdiction MET all the Standard #4 – Uniform Inspection Program criteria?

- Yes No

SECTION II
GUIDE TO THE UNIFORM INSPECTION PROGRAM AUDIT
EVALUATION OF CONTENT

(Please refer to the “Guide to the Uniform Inspection Program Audit” document when responding to the following questions)

1. Were the instructions given in the *Guide to the Uniform Inspection Program Audit* sufficient for you to understand and implement the uniform inspection audit process in your jurisdiction?

Yes No

2. Please put an “X” in the boxes below to identify any Section(s) of the *Guide to the Uniform Inspection Program Audit* you believe needs improvement. Please provide your recommendation(s) for improving the *Guide* in the space provided for each subject area. The page number from the *Guide* for each subject area is included in parentheses. If you have no recommended changes for a specific Section of the *Guide*, leave the corresponding box and comment area blank.

<input type="checkbox"/>	Preparing for Pilot Project Participation (page 1)

<input type="checkbox"/>	Purpose of the Uniform Inspection Program Audit (page 2)

The Uniform Inspection Program Audit Process

<input type="checkbox"/>	Selection of Establishments (page 2)

<input type="checkbox"/>	File Review – Selected Establishments (page 2)

(Section II – continues on the next page)

SECTION II
GUIDE TO THE UNIFORM INSPECTION PROGRAM AUDIT
EVALUATION OF CONTENT

*(Section II – continued from the previous page.
Please refer to the “Guide to the Uniform Inspection Program Audit” document
when responding to the following questions)*

The Uniform Inspection Program Audit Process (continued)

<input type="checkbox"/>	FSIO’s Role During Joint Field Inspections (page 2)

<input type="checkbox"/>	Uniform Inspection Auditor’s Role During Joint Inspections (page 2)

Pilot Project Steps – Uniform Inspection Program Audit

<input type="checkbox"/>	Step 1 (page 2)

<input type="checkbox"/>	Step 2 (page 3)

<input type="checkbox"/>	Step 3 (page 3)

(Section II – continues on the next page)

SECTION II
GUIDE TO THE UNIFORM INSPECTION PROGRAM AUDIT
EVALUATION OF CONTENT

*(Section II – continued from the previous page.
Please refer to the “Guide to the Uniform Inspection Program Audit” document
when responding to the following questions)*

Pilot Project Steps – Uniform Inspection Program Audit (continued)

<input type="checkbox"/>	Step 4 (page 3)

<input type="checkbox"/>	Step 5 (page 3)

<input type="checkbox"/>	Step 6 (page 3)

<input type="checkbox"/>	Step 7 (page 3)

<input type="checkbox"/>	Uniform Inspection Program Audit Pilot Project – Reference Documents (page 4)

(Section III – Starts on the next page)

SECTION III
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
AUDIT WORKSHEET AND AUDIT REFERENCE GUIDE
EVALUATION OF CONTENT

(Please refer to the Uniform Inspection Program Audit Worksheet and Audit Reference Guide when responding to the following questions)

1. The 10 uniform inspection Program Components included on the *Audit Worksheet* (and identified on page 1 of the *Audit Reference Guide*) sufficiently address inspection uniformity, inspection quality, inspection frequency, and uniform application of the regulatory jurisdictions retail food safety regulations and administrative procedures and are appropriate for all retail food program inspection staff. *(Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).*

Strongly Disagree

Strongly Agree

1

2

3

4

5

6

Please explain the reasons used to determine this rating.

2. The required minimum of two retail food establishment file reviews and joint field inspections for each FSIO is the appropriate number for completing a uniform inspection program audit?

Yes

No

If you answered No, how many retail food establishment file reviews and joint field inspections do you believe should be conducted with each FSIO as part of the audit process? Please explain the reason for your answer.

3. Are there additional Program Components that you believe are necessary in order to effectively conduct a uniform inspection program audit but are MISSING from the current *Audit Worksheet*?

Yes

No

Please identify and describe these MISSING Program Components.

(Section III – continues on the next page)

SECTION III
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
AUDIT WORKSHEET AND AUDIT REFERENCE GUIDE
EVALUATION OF CONTENT

*(Section III – continued from the previous page.
Please refer to the Uniform Inspection Program Audit Worksheet and Audit Reference Guide
when responding to the following questions)*

4. Were any of the 10 Program Components consistently difficult to assess during the uniform inspection program audit?

Yes No

Please identify these by placing an “X” adjacent to the **item number** that identifies any Program Component(s) that were **DIFFICULT TO OBSERVE**. The Item number below corresponds to the same item number on the Audit Worksheet.

<input type="checkbox"/> Item 1	<input type="checkbox"/> Item 3	<u>Audit Worksheet</u>	<input type="checkbox"/> Item 7	<input type="checkbox"/> Item 9
<input type="checkbox"/> Item 2	<input type="checkbox"/> Item 4	<input type="checkbox"/> Item 5	<input type="checkbox"/> Item 8	<input type="checkbox"/> Item 10
<input type="checkbox"/> Item 6				

5. If you have identified DIFFICULT TO OBSERVE Program Component(s), what factors made them difficult to observe?

6. Were there specific Program Components that FSIOs consistently experienced DIFFICULTY?

Yes No

Please identify these by placing an “X” adjacent to **the item number** of the Performance Elements(s) FSIOs had **DIFFICULTY** with. The Item number below corresponds to the same item number on the Audit Worksheet.

<input type="checkbox"/> Item 1	<input type="checkbox"/> Item 3	<u>Audit Worksheet</u>	<input type="checkbox"/> Item 7	<input type="checkbox"/> Item 9
<input type="checkbox"/> Item 2	<input type="checkbox"/> Item 4	<input type="checkbox"/> Item 5	<input type="checkbox"/> Item 8	<input type="checkbox"/> Item 10
<input type="checkbox"/> Item 6				

7. If you have identified Program Component(s) that FSIOs experienced DIFFICULTY with, what factors contributed to their challenges?

(Section III – continues on the next page)

SECTION III
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
AUDIT WORKSHEET AND AUDIT REFERENCE GUIDE
EVALUATION OF CONTENT

*(Section III – continued from the previous page.
Please refer to the Uniform Inspection Program Audit Worksheet and Audit Reference Guide
when responding to the following questions)*

8. Do you think there are any Program Components that should be DELETED from the Audit Worksheet?

Yes No

Please identify these by placing an “X” next to the item number of the Program Component(s) that should be DELETED. The Item number below corresponds to the same item number on the Audit Worksheet.

<input type="checkbox"/> Item 1	<input type="checkbox"/> Item 3	<u>Audit Worksheet</u>	<input type="checkbox"/> Item 5	<input type="checkbox"/> Item 7	<input type="checkbox"/> Item 9
<input type="checkbox"/> Item 2	<input type="checkbox"/> Item 4		<input type="checkbox"/> Item 6	<input type="checkbox"/> Item 8	<input type="checkbox"/> Item 10

9. If you recommended that one or more Program Components be deleted in Question #8, what rationale can you provide to support your recommendation?

10. The performance areas/competencies listed as examples under each Program Component on pages 2 through 4 of the *Audit Reference Guide* are helpful to conducting the uniform inspection program audit. (Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

Strongly Disagree 1 2 3 4 5 6 **Strongly Agree**

Please provide an explanation for your response.

(Section III – continues on the next page)

SECTION III
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
AUDIT WORKSHEET AND AUDIT REFERENCE GUIDE
EVALUATION OF CONTENT

*(Section III – continued from the previous page.
Please refer to the Uniform Inspection Program Audit Worksheet and Audit Reference Guide
when responding to the following questions)*

11. Are there any of the 10 Program Components for which the performance areas/competencies listed as examples on pages 2 through 4 of the *Audit Reference Guide* need REVISIONS (additions, deletions, changes)?

Yes No

Please identify these by placing an “X” next to the item number of the Program Component(s) needing REVISIONS to the examples provided on pages 2 through 4 of the *Audit Reference Guide*.

Audit Reference Guide (pages 2-4)

<input type="checkbox"/> Item 1	<input type="checkbox"/> Item 3	<input type="checkbox"/> Item 5	<input type="checkbox"/> Item 7	<input type="checkbox"/> Item 9
<input type="checkbox"/> Item 2	<input type="checkbox"/> Item 4	<input type="checkbox"/> Item 6	<input type="checkbox"/> Item 8	<input type="checkbox"/> Item 10

12. If you identified one or more Program Component(s) needing REVISIONS, what changes would you recommend to the performance areas/competencies listed as examples?

(Section IV – Starts on the next page)

SECTION IV
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
AUDIT WORKSHEET
EVALUATION OF THE WORKSHEET FORMAT

(Please refer to the Uniform Inspection Program Audit Worksheet when responding to the following questions)

1. The format of the *Audit Worksheet* is user-friendly. *(Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).*

Strongly Disagree

 1 2 3 4 5 6

Strongly Agree

What improvements would you recommend?

2. The header labels are appropriate.

Strongly Disagree

 1 2 3 4 5 6

Strongly Agree

What improvements would you recommend?

3. Enough space is provided for responses and comments.

Strongly Disagree

 1 2 3 4 5 6

Strongly Agree

What improvements would you recommend?

4. Is there any general information you believe is important that is MISSING?

Yes

No

Please identify information that needs to be ADDED.

(Section IV – continues on the next page)

SECTION IV
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
AUDIT WORKSHEET
EVALUATION OF THE WORKSHEET FORMAT

(Section IV – continued from the previous page.)

Please refer to the Uniform Inspection Program Audit Worksheet when responding to the following questions)

5. Is there any general information that should be DELETED?

Yes

No

Please identify information that should be DELETED.

6. Did you modify the *Audit Worksheet* during the Uniform Inspection Program Pilot Project?

Yes

No

If Yes, please attach a copy of your modified *Audit Worksheet*.

(Section V – Starts on the next page)

SECTION V
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
(OPTIONAL FORM)
AUDIT RESULTS SUMMARY AND FSIO TRAINING PLAN

(Please refer to the Audit Results Summary and FSIO Training Plan to respond to the following questions)

1. The *Audit Results Summary and FSIO Training Plan* was included as an optional form a jurisdiction could use during the uniform inspection program audit pilot project. Did your jurisdiction decide to use the form?

Yes No

What factors influenced your decision?

IF YOUR JURISDICTION USED THE OPTIONAL AUDIT RESULTS SUMMARY AND TRAINING PLAN – PLEASE RESPOND TO QUESTIONS 2-6. IF YOU DID NOT USE THE OPTIONAL AUDIT RESULTS AND TRAINING PLAN PROCEED TO SECTION VI

2. The *Audit Result Summary and FSIO Training Plan* is a useful tool for documenting the audit process and ensuring that additional training is provided to the FSIO for Program Components noted as needing improvement during the establishment file reviews and joint field inspections. *(Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).*

Strongly Disagree

Strongly Agree

1

2

3

4

5

6

What improvements would you recommend?

3. The format of the *Audit Results Summary and FSIO Training Plan* is user-friendly

Strongly Disagree

Strongly Agree

1

2

3

4

5

6

What improvements would you recommend?

(Section V – continues on the next page)

SECTION V
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
(OPTIONAL FORM)
AUDIT RESULTS SUMMARY AND FSIO TRAINING PLAN

(Section V – continued from the previous page.)

(Please refer to the Audit Results Summary and FSIO Training Plan to respond to the following questions)

4. The header labels on the *Audit Results Summary and Training Plan* are appropriate.

Strongly Disagree

 1 2 3 4 5 6

Strongly Agree

What improvements would you recommend?

5. Enough space is provided for responses and comments on the form.

Strongly Disagree

 1 2 3 4 5 6

Strongly Agree

What improvements would you recommend?

6. Is there any general information that is missing?

Yes

No

Please identify information that needs to be ADDED.

(Section VI – Starts on the next page)

SECTION VI
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
RESULTS SUMMARY

1. How many FSIOs were assessed as part of the jurisdiction’s uniform inspection program audit? _____

2. How many FSIOs successfully performed all 10 Program Components during the Audit Process? _____

3. Within your jurisdiction, who served as the “auditors” (individuals responsible for assessing FSIOs as part of the uniform inspection program audit)?

A. Retail Food Program Managers

B. The Supervisors of the FSIOs

C. Training Officers

D. Senior FSIOs

E. Quality Assurance/Quality Control Officers

F. Other – Please describe in box provided below

3. How many “auditors” (individuals responsible for assessing FSIOs as part of the uniform inspection program audit) participated in the Pilot Project? _____

4. Was there more than one auditor per FSIO?

Yes

No

5. If you answered YES to Question #4 , did FSIOs report any differences between the auditors related to how the audit was conducted?

Yes

No

If differences were noted, provide specific examples?

(Section VI – continues on the next page)

SECTION VI
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
RESULTS SUMMARY

(Section VI – continued from the previous page).

6. **The uniform inspection program audit process is designed in such a way as to facilitate a strengths-weaknesses assessment of our jurisdiction regulatory retail food protection inspection program.**
(Please place an “X” in the box next to the rating that reflects the level of your agreement or disagreement with this statement).

Strongly Disagree

Strongly Agree

1

2

3

4

5

6

What changes would you recommend to enhance the inspection program audit process?

7. **On average, how long did it take to complete an orientation of the Uniform Inspection Program Audit process and *Audit Worksheet* for each of the FSIOs?**

A. less than 60 minutes

B. 61 – 120 minutes

C. 121 – 180 minutes

D. Other. Please Specify

8. **On average, how long did it take to complete an audit of the Pre-Inspection Establishment File Review?**

A. less than 30 minutes

B. 31 – 60 minutes

C. Other. Please Specify

9. **On average, how long did it take to complete the audit of a joint field inspection (SINGLE INSPECTION) using the Audit Worksheet (actual time in hours – including inspection, completion of the inspection report, and discussion of the inspection report with the person in charge)? Do NOT include travel time to & from the establishment.**

A. less than 60 minutes

B. 61 – 120 minutes

C. 121 – 180 minutes

D. Other. Please Specify

10. **On average, how long did it take to complete the audit process for each individual FSIO? (Include the orientation process; establishment file reviews; actual inspection time; review of the audit reports with the FSIO; and completion of all inspection program audit documents/worksheets.)**

A. less than 8 hours

B. 9 – 16 hours

C. 17 – 24 hours

D. 25 – 32 hours

E. 33 – 40 hours

F. Other. Please Specify:

(Section VI – continues on the next page)

SECTION VI
UNIFORM INSPECTION PROGRAM AUDIT PILOT PROJECT
RESULTS SUMMARY

(Section VI – continued from the previous page).

11. The uniform inspection program audit process is a valuable use of my Jurisdiction’s resources (e.g., time; staff; finances).

Strongly Disagree

 1 2 3 4 5 6

Strongly Agree

Explain, why?

12. If you indicated in Question #11 that the Uniform Inspection Program Audit process was a valuable use of your Jurisdiction’s resources, how should the audit documents and forms be made available to other regulatory retail food protection programs?

- A.** The Uniform Inspection Program Audit and Forms should be included as an example template in an Appendix to Standard 4 – Uniform Inspection Program, *FDA Voluntary National Retail Food Regulatory Program Standards*.
- B.** The Uniform Inspection Program Audit and Forms should be made available as a resource document on FDA’s web site as a stand alone piece. The audit process and forms should not be included as part of the *FDA Voluntary National Retail Food Regulatory Program Standards*
- C.** Other – Please describe in box provided below

(Section VII – Starts on the next page)

SECTION VII
UNIFORM INSPECTION PROGRAM AUDIT
ADDITIONAL COMMENTS SECTIONS

(Provide any additional comments on any aspect of the Uniform Inspection Program Audit process or forms)

GUIDE TO THE UNIFORM INSPECTION PROGRAM AUDIT

Conference for Food Protection Uniform Inspection Program Audit Pilot Project

The Guide to the Uniform Inspection Program Audit:

- Provides the background leading up to the development of the Conference for Food Protection (CFP) Uniform Inspection Program Audit Pilot Project;
- Describes the purpose of the audit;
- Defines Food Safety Inspection Officer's (FSIO) role;
- Clarifies the auditor's role;
- Discusses food establishment selection criteria, and
- Outlines the implementation steps for the project.

Preparing for Pilot Project Participation

A work group originally assembled by the 2004 Conference has been working with representatives of the Food and Drug Administration (FDA) to create a multi-tiered process for training and standardizing FSIOs. Over the past 5 years, the work group has used the criteria contained in the *FDA Voluntary National Retail Food Regulatory Program Standards (FDA Program Standards)*, Standard 2 – Trained Regulatory Staff to develop a comprehensive training model for regulatory retail food safety inspection officers.

Jurisdiction's participating in the pilot project must implement the training criteria in Standard #2 for FSIOs newly hired or assigned to the retail food protection program. A copy of the Standard 2 criteria, including the CFP Field Training Plan is included with the CFP Pilot Project Package

After completing the training requirements in Steps 1 through 3, Standard 2, Trained Regulatory Staff, the FSIO is now eligible as a candidate for the Uniform Inspection Program Audit that is to be used in conjunction with the quality assurance criteria contained in Standard 4. Standard 4 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/enforcement procedures. It requires that an assessment review of each inspector's work be made during at least two joint on-site inspections, with a corresponding file review of at least the three most recent inspection reports. The quality assurance assessment must include a review of 10 program components that comprise the Uniform Inspection Program Audit Worksheet used to evaluate inspection uniformity, inspection quality, inspection frequency, and uniform application of the regulatory jurisdictions retail food safety regulations and administrative procedures by all inspection staff.

Jurisdiction's participating in the pilot project must follow the criteria in Standard#4 and commit to conducting at least two file reviews and joint field inspections of selected retail food

establishments with eligible FSIOs. A copy of the Standard 4 criteria is included with the CFP Pilot Project Package.

Purpose of the Uniform Inspection Program Audit

The use of the Uniform Inspection Program Audit provides a mechanism for regulatory jurisdictions to conduct quality assurance evaluations of their retail food protection programs while assessing the strengths and weakness within their training program for FSIOs.

The Uniform Inspection Program Audit Process

Selection of Establishments

Management should select the two establishments to be used for the uniform inspection program audit following the Standard 4 criteria. In all cases, the food establishments selected should reflect the work covered during the FSIO's training and provide an opportunity to assess all 10 program components identified in the Standard 4 criteria.

File Review – Selected Establishments

A file review of each of the selected establishments is to be conducted as part of the audit process in order to assess the inspection program areas and competencies that may not be observable on-site at the facility. For example, repeat violations, follow-up compliance and enforcement, and discussion and documentation of long-term corrective options may be difficult or impossible to assess without an establishment file review.

FSIO's Role During Joint Field Inspections

The FSIO is responsible for independently conducting the inspection while being evaluated by the auditor. The FSIO should refrain from asking the auditor questions pertinent to the inspection (e.g. advice, assistance), but should feel free to explain his/her actions to the auditor before and during the audit. These explanations help the auditor understand the FSIO's approach to the inspection and reduce the risk of the auditor drawing inaccurate conclusions about the FSIO's actions. If unique or unexpected circumstances are encountered during the audit, the FSIO may seek appropriate guidance from his/her supervisor (or designee) while keeping the auditor informed of these contacts.

Uniform Inspection Auditor's Role During Joint Inspections

The uniform inspection program auditor assesses the FSIO's ability to conduct an inspection using the Standard 4 criteria and plays no role in conducting the inspection. The FSIO should conduct the inspection as if the auditor were not present. The auditor needs to be as unobtrusive as possible. The auditor may ask questions of the FSIO to better understand or clarify the rationale for the candidate's actions.

Pilot Project Steps – Uniform Inspection Program Audit

NOTE: Overall responsibility for the implementation of this pilot project within each jurisdiction rests with the (State, Local, Tribal) retail food protection program management. Management may want to delegate audit responsibilities to first line

supervisors (i.e. establishment selection, audit scheduling, and completion of uniform inspection program tables contained in Appendix D, Standard 4).

Step 1 – The FSIO works with his/her first line supervisor (or designee) to complete all requirements listed in Steps 1 through 3, Standard 2 – Trained Regulatory Staff.

Step 2 – The supervisor confirms that the FSIO has completed the required Standard 2 training outlined in Step 1 above.

Step 3 – The Department Director (or designee) selects the individual(s) to conduct the uniform inspection program audits. At least two retail food establishment file reviews and joint field inspections must be completed for each eligible FSIO. Establishments used in the audit must be selected in accordance with the protocol outlined in Appendix D, Standard 4 – Uniform Inspection Program.

NOTE: Jurisdictions having less than four FSIOs will need to conduct extra inspections with each inspector in order to reach a minimum total of 8 inspections. This is necessary in order to have a sample of inspection large enough to statistically measure the uniformity of the inspection program fairly (Standard 4, Appendix D).

Step 4 – Each eligible FSIO performs a file review and field inspection with the jurisdiction’s designated auditor. During these quality assurance assessments, the jurisdiction’s designated auditor will verify that FSIO successfully demonstrates each of the desired activities and competencies for the 10 inspection program areas listed in the Standard 4 criteria. The CFP Uniform Inspection Program Audit Worksheet is completed by the auditor for each of the selected establishments. For this CFP pilot project, the Uniform Inspection Program Audit Reference Guide has been developed as an auditing tool for determining the competencies to observe for each inspection program area.

Step 5 – Upon completion of the file reviews and joint field training inspections for the selected establishments, the jurisdiction’s designated auditor completes the Audit Results Summary section of the Audit Results Summary and FSIO Training Plan Form. The Audit Results Summary establishes a method for providing feedback to the FSIO and identifies any inspection program areas or competencies the FSIO needs additional training on. The jurisdiction has the flexibility to address these additional training areas using their internal procedures and training programs. A FSIO Training Plan template is included as a tool for jurisdiction to develop a structured approach for addressing each competency the FSIO did not perform successfully during the audit process.

Step 6 – The FSIO performance results from all Uniform Inspection Audit Worksheets are used to complete the Standard 4 quality assurance assessment of the retail food protection inspection program. The jurisdiction uses the tables in Appendix D, Standard 4, to determine conformance with the uniform inspection program criteria.

- Jurisdictions with less than 10 FSIOs are to use Table D-1
- Jurisdictions with more than 10 FSIOs are to use Table D-2

Appendix D, Standard 4 provides instructions for how to use each of the tables described above.

Step 7 – The jurisdiction uses the results from the Standard 4 – Uniform Inspection Audit as one of the tools for determining the strengths and gaps within their Food Safety Inspection Officer training program. If any of the 10 uniform inspection program areas are not met, the jurisdiction may need to re-assess the training materials/methods used to prepare FSIOs for performing these inspection program competencies.

Uniform Inspection Program Audit Pilot Project - Reference Documents

- FDA Voluntary National Retail Food Regulatory Program Standards (April 2009):
 - Standard 2, Trained Regulatory Staff
 - Appendix B – Supplement to Standard 2 – Trained Regulatory Staff
 - Standard 4, Uniform Inspection Program
 - Appendix D – Supplement to Standard 4 – Uniform Inspection Program
- Guide to the Uniform Inspection Program Audit
- Uniform Inspection Program Pilot Project – Audit Worksheet
- Uniform Inspection Program Pilot Project – Audit Reference Guide
- Uniform Inspection Program Pilot Project – Audit Results Summary and FSIO Training Plan

Audit Worksheet
Conference for Food Protection
Uniform Inspection Program Audit Pilot Project

Food Safety Inspection Officer:	
Date of Audit Start:	Date of Audit End:
Jurisdiction's Auditor:	
Selected Establishment:	Permit Number:
Establishment Address:	

Uniform Inspection Program Audit Worksheet

(To be used for the two joint field inspections and file reviews conducted as part of the Standard 4 – Uniform Inspection Program quality assurance assessment)

Food Safety Inspection Officer (FSIO) has successfully completed pre-requisite training courses as specified in the *FDA Voluntary National Retail Food Regulatory Program Standards*, Standard 2 – Trained Regulatory Staff.

YES NO

COMMENTS

1. Did the Food Safety Inspection Officer (FSIO) determine and document the compliance status of each risk factor and intervention (i.e., IN compliance, OUT of Compliance, Not Observed, or Not Applicable) through observation and investigation?

YES NO

COMMENTS

2. Did the FSIO complete an inspection report that is clear, legible, concise, and accurately records findings, observations and discussion with establishment management?

YES NO

COMMENTS

3. Did the FSIO interpret and apply laws, regulations, policies and procedures correctly?

YES NO

COMMENTS

4. Did the FSIO cite the proper code provisions for CDC-identified risk factors and Food Code interventions?

YES NO

COMMENTS

5. Did the FSIO review past inspection findings and act on repeated or unresolved violations?

YES NO

COMMENTS

6. Did the FSIO follow through with compliance and enforcement procedures in accordance with the jurisdiction's administrative procedures?

YES NO

COMMENTS

7. Did the FSIO obtain and document on-site corrective action for out-of-control risk factors at the time of inspection as appropriate to the type of violation?

YES NO

COMMENTS

8. Did the FSIO document that options for the long term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurred 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.

YES NO

COMMENTS

9. Did the FSIO verify that the establishment is in the proper risk category and that the required inspection frequency is being met?

YES NO

COMMENTS

10. Does the FSIO file reports and other documents in a timely manner?

YES NO

COMMENTS

AUDIT REFERENCE GUIDE
Conference for Food Protection
Uniform Inspection Program Audit Pilot Project

Standard 4 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/enforcement procedures. It requires that an assessment review of each inspector’s work be made during at least two joint on-site inspections, with a corresponding file review of at least the three most recent inspection reports. The quality assurance assessment must include a review of 10 program components that evaluate inspection uniformity, inspection quality, inspection frequency, and uniform application of the regulatory jurisdictions retail food safety regulations and administrative procedures by all inspection staff. The quality assurance assessment is intended to assure that each inspector:

1. Determines and documents the compliance status of each risk factor and intervention (i.e., IN compliance, OUT of Compliance, Not Observed, or Not Applicable) through observation and investigation;
2. Completes an inspection report that is clear, legible, concise, and accurately records findings, observations and discussion with establishment management;
3. Interprets and applies laws, regulations, policies and procedures correctly;
4. Cites the proper code provisions for CDC-identified risk factors and Food Code interventions;
5. Reviews past inspection findings and acts on repeated or unresolved violations;
6. Follows through with compliance and enforcement;
7. Obtains and documents on-site corrective action for out-of-control risk factors at the time of inspection as appropriate to the type of violation;
8. Documents that options for the long term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurred 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;
9. Verifies that the establishment is in the proper risk category and that the required inspection frequency is being met; and
10. Files report and other documents in a timely manner

Standard 4 requires that an assessment of each inspector’s work, using the above 10 inspection program areas, be made during a least two joint on-site inspections, with a corresponding file review of the three most recent inspection reports. Retail food program inspection staff must demonstrate competency for each of the 10 Standard 4 inspection program areas. The Audit Reference Guide is designed to help clarify the competencies that correspond to each of the 10 inspection program areas identified in the Standard 4 criteria and included as part of the Uniform Inspection Program Audit Worksheet.

For each inspection program area, examples of applicable competencies from the CFP Field Training Plan are included as part of the Audit Reference Guide. The list of competencies under each inspection program area, are examples and **not** intended to be all inclusive. Should further guidance be needed, the CFP Field Training Plan contains a comprehensive listing of competencies that can be used to determine that a FSIO has successfully demonstrated the required inspection program area.

UNIFORM INSPECTION PROGRAM AREAS

11. **Did the Food Safety Inspection Officer (FSIO) determine and document the compliance status of each risk factor and intervention (i.e., IN compliance, OUT of Compliance, Not Observed, or Not Applicable) through observation and investigation?**

Examples of Performance Areas/Competencies from the Standard 2 CFP Field Training Plan:

- FSIO correctly used inspection equipment during joint inspections.
- FSIO asked questions and engages in a dialogue with person in charge/employees to obtain information relevant to inspection.
- FSIO used available means (e.g., interpreter, drawings, demonstrations, diagrams, international food safety icons) to overcome language or communication barriers.
- FSIO demonstrated proper sanitary practices as expected from a food service employee.
- FSIO used a risk-based inspection methodology to correctly assess regulations related to employee practices and management procedures essential to the safe storage, preparation, and service of food. When the risk factor and/or intervention was applicable and observable during the inspection, the FSIO verified:
 - i. Demonstration of Knowledge of the person in charge
 - ii. Approved food sources
 - iii. Food safety practices for preventing cross-contamination of ready-to-eat foods
 - iv. Food contact surfaces are cleaned and sanitized
 - v. Restriction and exclusion of ill employees
 - vi. Employee handwashing
 - vii. Cooking temperatures to destroy bacteria and parasites
 - viii. Cold holding, hot holding, cooling and reheating temperatures of foods requiring time/temperature control for safety (TCS)
 - ix. Procedures are in place when time alone is used as a microbial growth barrier
 - x. Date marking of ready-to-eat, TCS food held for more than 24 hours
 - xi. Availability of a consumer advisory for foods of animal origin served raw or undercooked

12. Did the FSIO complete an inspection report that is clear, legible, concise, and accurately records findings, observations and discussion with establishment management?

Examples of Performance Areas/Competencies from the Standard 2 CFP Field Training Plan:

- FSIO completed inspection form per jurisdiction’s administrative procedures (e.g., observations; corrective actions; public health reason; applicable code reference; compliance dates).
- FSIO included with inspection report any compliance or regulatory documents identified or cross-referenced in written statements (e.g., exhibits, attachments, sample forms, embargo forms, destruction forms, suspension notices).
- FSIO presented inspection report, and when necessary cross-referenced documents, to person in charge.
- FSIO conducted an exit interview explaining out of compliance observations and identifying corrective actions and timelines for all noted violations.
- FSIO only reported substantiated findings as violations.
- FSIO used effective communication and conflict resolution techniques to overcome inspection barriers

13. Did the FSIO interpret and apply laws, regulations, policies and procedures correctly?

Examples of Performance Areas/competencies from the Standard 2 CFP Field Training Plan:

- FSIO correctly assessed the compliance status of other regulations (not included in Item 1 above) that are included in jurisdiction’s prevailing statutes, regulations and/or ordinances.
- FSIO provided the person in charge/employees with accurate answers to inspection-related questions.

14. Did the FSIO cite the proper code provisions for CDC-identified risk factors and Food Code interventions?

Examples of Performance Areas/Competencies from the Standard 2 CFP Field Training Plan:

- FSIO has knowledge of jurisdiction’s laws, rules, and regulations required for conducting retail food/foodservice inspections.
- FSIO cited the proper code provision for CDC-identified risk factors and Food Code interventions on the written inspection report.

15. Did the FSIO review past inspection findings and act on repeated or unresolved violations?

Examples of Performance Areas/Competencies from the Standard 2 CFP Field Training Plan:

- FSIO reviewed establishment file for previous inspection reports noting documented out of compliance observations.
- FSIO reviewed establishment complaints on file.
- FSIO verified correction of out of compliance observations identified during previous inspections.

16. Did the FSIO follow through with compliance and enforcement procedures in accordance with the jurisdiction’s administrative procedures?

Examples of Performance Areas/Competencies from the Standard 2 CFP Field Training Plan:

- FSIO follows the jurisdiction’s compliance and enforcement polices and procedures regarding repeated and unresolved violations.
- FSIO follows the jurisdiction’s policy in regard to disclosure of confidential information.

17. Did the FSIO obtain and document on-site corrective action for out-of-control risk factors at the time of inspection as appropriate to the type of violation?

Examples of Performance Areas/Competencies from the Standard 2 CFP Field Training Plan:

- FSIO obtained immediate corrective action for out of compliance employee practices and management procedures essential to the safe storage, preparation, and service of food.
- FSIO documented on the written inspection report the immediate corrective action that was taken for each out-of-control risk factor.

18. Did the FSIO document that options for the long term control of risk factors were discussed with establishment managers when the same out-of-control risk factor occurred 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.

Examples of Performance Areas/Competencies:

- FSIO discussed options, included in the jurisdiction’s administrative policies, for long term control of risk factors with the person in charge in case where the out-of-control risk factor occurred on consecutive inspections.
- FSIO documented on the inspection report the long term control option agreed to by the person in charge for the identified out-of-control risk factor.

19. Did the FSIO verify that the establishment is in the proper risk category and that the required inspection frequency is being met?

Examples of Performance Areas/Competencies from the Standard 2 CFP Field Training Plan:

- FSIO reviewed establishment file to determine proper risk category and that the required inspections have been completed
- If applicable, FSIO reviewed establishment files for required HACCP Plans or documents supporting the issuance of a variance.

20. Does the FSIO file reports and other documents in a timely manner?

Examples of Performance Areas/Competencies:

- A review of the records within the establishment file indicates that the FSIO has followed the jurisdiction's administrative procedures pertaining to the filing of inspection reports and support documents.

Audit Results Summary and FSIO Training Plan

Conference for Food Protection Uniform Inspection Program Audit Pilot Project

Use of the Audit Results Summary and FSIO Training Plan

The *FDA Voluntary National Retail Food Regulatory Program Standards* (Program Standards) provide a foundation upon which a regulatory retail food protection program can build through a continuous improvement process. The CFP Uniform Inspection Program Audit Pilot Project provides a quality assurance assessment of the jurisdiction's inspection program and identifies training priorities for each Food Safety Inspection Officer (FSIO). The Audit Results Summary and FSIO Training Plan provides a method for addressing additional inspection program training needs identified during the uniform inspection program audit process.

As the title implies, the Audit Results Summary and FSIO Training Plan consists of two parts:

- PART I – Audit Results Summary
- PART II – FSIO Training Plan

Completion of each part of the form establishes a structure for ensuring that FSIOs are provided the necessary program support to address any of the competencies noted during the inspection program audit process as ones where additional training is needed.

PART I – Audit Results Summary

The jurisdiction's designated auditor completes the audit results summary, including the header information. In the header section, the auditor will indicate if the FSIO requires additional training for one or more competencies observed during the audit process.

A. No Additional Training Needs Identified During the Audit

If "NO" additional training needs have been identified, then the auditor, FSIO, and the FSIO's Supervisor sign the bottom of the summary section confirming the audit results. The original should be placed in the FSIO's Training file. The FSIO should make a copy for their records.

B. Additional Training Needs Identified During the Audit

If additional training needs were identified during the uniform inspection program audit process, the auditor checks the "YES" box in the header section. In the table below the header section, the auditor identifies the competencies from the Audit Worksheet for which the FSIO requires additional training. The auditor reviews these items with the FSIO and the FSIO's Supervisor to ensure understanding of the specific competency that is to be addressed through training. The auditor, FSIO, and the FSIO's Supervisor all sign the form at the bottom of the page confirming the audit results.

PART II – FSIO Training Plan

(NOTE: Part II is not completed unless the auditor has identified FSIO competencies (in Part I) that require additional training)

The FSIO's Supervisor meets with the FSIO to set up an appropriate training plan to address competencies in need of improvement. The jurisdiction's inspection program policies and procedures should address appropriate types of training and methods. Training could range from simply a demonstration or discussion of the proper procedures to a structured training workshop. The selected training method should provide the FSIO the knowledge, skill, and ability to perform each of the competencies the auditor earmarked for improvement. In PART II, the FSIO's Supervisor documents the agreed upon training plan. The FSIO and the FSIO's Supervisor sign indicating full understanding and commitment to the training.

The FSIO supervisor follows up to ensure that the training plan is completed per the jurisdiction's administrative procedures and time frames. The supervisor documents when the FSIO has successfully demonstrated the competencies identified in the training plan. If additional training is needed, the supervisor documents the new plan. Upon successful completion of the training plan, the FSIO, FSIO's Supervisor, and Food Program Manager sign the bottom of training plan. The original is placed in the FSIO's Training file. The FSIO retains a copy for their records.

Audit Results Summary and FSIO Training Plan
Conference for Food Protection
Uniform Inspection Program Audit Pilot Project

Date:
Food Safety Inspection Officers Name:
Jurisdiction's Auditor Name:
Date Uniform Inspection Audit Completed:
Uniform Inspection Program Audits Results indicate additional FSIO training needs: <input type="checkbox"/> YES <input type="checkbox"/> NO

If Audit Results indicate additional FSIO training is needed, complete the following table:

PART I – AUDIT RESULTS SUMMARY	
<i>Identify the specific competencies needing improvement from the Uniform Inspection Program Audit Worksheet and describe the specific performance required.</i>	
Competency:	
<i>Specific Improvement Required:</i>	
Competency:	
<i>Specific Improvement Required:</i>	
Competency:	
<i>Specific Improvement Required:</i>	
Competency:	
<i>Specific Improvement Required:</i>	
Competency:	
<i>Specific Improvement Required:</i>	
Confirmation of Audit Results Signatures	
Jurisdiction's Auditor:	Date:
FSIO:	Date:
FSIO's Supervisor:	Date:

PART II – FSIO Training Plan			
<i>Describe the training methods and instruction for addressing each competency identified in the table above.</i>			
Training Plan Agreement Signatures			
FSIO:		Date:	
FSIO's Supervisor:		Date:	
Follow-Up on FSIO Training Plan			
Follow-up Training Completion Date(s):			
<input type="checkbox"/> <i>FSIO has successfully demonstrated the competencies identified in the training plan</i>			
<input type="checkbox"/> <i>FSIO has not successfully demonstrated the competencies identified – additional training is needed</i>			
<i>The competencies where additional training is needed include:</i>			
Follow-up Review Signatures			
FSIO:		Date:	
FSIO's Supervisor:		Date:	
Food Program Manager:		Date:	