

## INSTRUCTIONS AND WORKSHEET FOR CONDUCTING A SELF-ASSESSMENT

### STANDARD 6 – COMPLIANCE AND ENFORCEMENT

#### Using the Standard 6 Establishment File Worksheet

The self-assessor should have the Standard 6 self-assessment worksheets available as a reference when reading through this guidance. The following worksheets are provided at the end of these instructions:

- *Standard 6: Self-Assessment Summary Worksheet*
- *Standard 6: Establishment File Worksheet*

The *Standard 6: Self-Assessment Summary Worksheet* is designed to provide a listing of the establishments randomly selected from the jurisdiction's inventory that were reviewed as part of the self-assessment process. This worksheet provides a summary as to whether or not the inspection file/records for each of the randomly selected establishments meet the Standard 6 criteria.

The *Standard 6: Establishment File Worksheet* provides a systematic way of collecting the compliance and enforcement history for each of the randomly selected establishments. Jurisdictions do not have to use this form. However, a jurisdiction must provide documentation of the review process. The documentation must indicate if appropriate compliance and enforcement actions were taken for out-of-control risk factors and *Food Code* interventions at each establishment randomly selected for the self-assessment.

#### STEP 1 – Assess the Elements in the Written Compliance & Enforcement Program

To meet the criteria of Standard 6, the jurisdiction must have written step-by-step procedures outlining its compliance and enforcement process. The jurisdiction should review its compliance and enforcement policies and procedures to ensure that there is clear guidance for staff. The policies and procedures should provide steps and actions to be taken when various categories of violations occur. The policies and procedures should also provide a progression of steps to be taken when violations are not corrected within regulatory or administratively established time frames.

In addition, the jurisdiction's inspection form must use the IN compliance, OUT of compliance, Not Applicable, and Not Observed conventions to record the compliance status of the foodborne illness risk factors and the public health interventions identified in the *Food Code* to meet the requirements of Standard 6.

#### STEP 2 – Assess the Effectiveness of the Compliance & Enforcement Program

~~Randomly selected establishment files will be reviewed to determine if documented violations were resolved satisfactorily in the establishment. The results of the review will be used to assess the success of the compliance and enforcement program. This section of the self-assessment process has been broken down into the following four parts:~~

Each jurisdiction shall measure the effectiveness of their compliance and enforcement program by either reviewing each inspection when a FBI Risk Factor or Public Health intervention was marked out of compliance or by using a statistical method to determine if the jurisdiction has satisfactorily resolved FBI Risk Factor and Public Health Intervention violations. The jurisdiction shall establish written procedures that:

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- Describe the compliance and enforcement review process;
- Include a review routine inspections that have at least one Foodborne Illness or Public Health Intervention Violations marked OUT of compliance. The number inspections reviewed and method of selection must provide a statistical confidence level equal to or greater than the published Standard 6 statistical model; and
- Include supporting documentation and worksheets.

If a jurisdiction does not wish to establish independent written procedures, the jurisdiction may use the method set forth in Parts I-IV.

**Part I** Determine the number of establishment files to review

**Part II** Randomly select establishment files from the jurisdiction's inventory

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**Part III** Conduct a review of each randomly selected establishment file

**Part IV** Determine the need to review additional randomly selected establishment files

**Part I -** Determine the number of establishment files to review

Jurisdictions with less than 800 total establishments must select at least 40 files for review. If a jurisdiction has less than 40 establishments in the inventory, then all files will be reviewed. Jurisdictions with 800 or more establishments must select a sample equal to 5% of the total establishments (up to a maximum of 70 files). This initial selection of sample files must be the first files reviewed.

Establishment Inventory	Number of Files to Review
Less than 800	40 establishment files
800 or more	5% of the total number of establishments (Up to a maximum of 70 files)

**Part II -** Randomly select establishment files from the jurisdiction’s inventory

Sample selection using a table of random numbers or a random number generator is preferred. This can be performed with a card file, ledger, list, or automated data system. The card file, ledger, list or automated database must be numbered or ordered in some fixed fashion so that the establishment files can be associated with the numbers selected by the random number generator.

There are many ways a jurisdiction can produce a listing of all the establishments in its inventory. The listing can be produced alphabetically; by permit number; permit date, etc. The establishment listing can be computer generated or it can be produced manually. Any method can be used as long as all the establishments are included once and only once. [The jurisdiction may exclude Food Establishments with a low risk categorization from the listing of all establishments.](#)

When randomly selecting establishments, the self-assessor must perform the following steps:

1. Record the random numbers in the order they were selected under the column “Randomly Selected Numbers” on the *Standard 6: Self-Assessment Summary Worksheet*;
2. Identify the establishment file that corresponds to the randomly selected number recorded on the *Standard 6: Self-Assessment Summary Worksheet*; and
3. Record the establishment name or identification number for each of the randomly selected numbers on the *Standard 6: Self-Assessment Summary Worksheet*.

**Part III -** Conduct a review of each randomly selected establishment file

When reviewing the compliance and enforcement history for each of the randomly selected files, the self-assessor should use a form similar to the Standard 6: Establishment File Worksheet to document their findings. This worksheet is included at the end of these instructions.

For each randomly selected establishment listed on the *Standard 6: Self Assessment Summary Worksheet*, the self-assessor must complete a separate *Standard 6: Establishment File Worksheet*.

The worksheet must document the following information:

- The name of the establishment and the permit number in the upper left hand corner of the “Establishment File Worksheet;”
- The “Start Point Inspection Date” under the heading provided. The “start-point” inspection will be the third oldest routine inspection in the establishment’s file at the time of the review if it shows a violation of one of the risk factors or public health interventions. If no risk factor or public health intervention violation is shown on that inspection, then the fourth oldest routine inspection may be used if it shows a risk factor or public health intervention violation. If no violation of a risk factor or public health intervention is documented on the third or fourth oldest routine inspection, then no “start-point” inspection exists for that establishment. Therefore, that establishment’s file “does not qualify” for the self-assessment review process. If the establishment “does not qualify,” the self-assessor must check the D.N.Q (did not qualify) box under the “Status of Reviewed File” and remove it from the review process. A substitute establishment file must be chosen using the second set of randomly selected numbers to replace this file.
- The Establishment File Worksheet lists ten foodborne illness risk factor and public health interventions along the top line. The self-assessor will record item numbers or other identifiers from its inspection form that correspond with each of the ten listed risk factors and public health intervention in the spaces provided adjacent the heading *Reference to local inspection items*.  
**Note:** The self-assessor should use the *Standard 1: Self-Assessment Worksheet for Part I - Interventions and Risk Factor Controls* to identify the jurisdiction's code requirements that correspond to the *Food Code* provisions included under each of the ten foodborne illness risk factor and intervention categories. If there is no corresponding local requirement for a particular foodborne illness risk factor or *Food Code* intervention, that item can be marked as "Not Applicable" in the *Reference Key*. Jurisdictions are not penalized under Standard 6 for items in the *Food Code* that have not been adopted.
- Using the *Start Point Inspection Violations* row of the worksheet, the self-assessor places an "X" under the appropriate foodborne illness risk factor or public health intervention headings if a violation was noted on the “start-point” inspection. The “X” must be entered under the appropriate heading even if the violations were corrected on site.
- For the purposes of the self-assessment, follow-up actions have been divided into three types:
  - *Was on-site corrective action taken?* – On-site corrective action that occurs at the time of a routinely scheduled inspection;
  - *Was follow-up corrective action taken?* – Follow-up action that occurs after the routine inspection such as re-inspection, training, risk control plans, and informal conferences;
  - *Was enforcement action taken?* – Enforcement activities such as fines permit suspension, hearings, mandated training, restriction of operations, embargo, etc.

Completion of these three items requires a complete review of the selected establishment file. To facilitate the documentation of the file review, the self-assessor may complete the table provided at the bottom of the Establishment File Worksheet. The summary table provides a

method for defining the acronyms and notations used on the worksheet to describe the type of compliance and enforcement action taken. The self-assessor must review all the documentation in the establishment file from the “start-point” inspection forward to the current date to determine if follow-up action was taken and documented for each risk factor and public health intervention that was out of compliance on the “start-point” inspection.

- The self-assessor must review the follow-up actions for each risk factor and public health intervention violation documented on the “start-point” inspection. The self-assessor must determine if the follow-up actions complied with the jurisdiction’s written procedures.
  - The self-assessor must place an “X” in the “File Meets the Standard 6 Criteria” box if:
    - The completed Worksheet shows at least one follow-up action in each column where a foodborne illness risk factor or public health intervention violation was marked on the “start-point” inspection; and
    - The jurisdiction’s written procedure was followed.
  - The self-assessor must place an “X” in the “File Does NOT Meet the Standard 6 Criteria box.” if:
    - The completed Worksheet shows that one or more of the “start-point” violations do not have at least one follow-up activity; or
    - The jurisdiction’s written procedure was not followed for one or more follow-up activities.
- When the review for each randomly selected establishment file is completed, the self-assessor must indicate his or her findings on the Self-Assessment Summary Worksheet. Under the “Status of Reviewed File” column, the self-assessor must check one of the following boxes:
  - “YES” – indicating that the reviewed file meets the Standard 6 criteria.
  - “NO” – indicating that the reviewed file does not meet the Standard 6 criteria.
  - “D.N.Q.” – indicating that the establishment file did not qualify for the assessment and a substitute file will need to be randomly selected and reviewed.

**Part IV - Determine the need to review additional randomly selected establishment files** Randomly selected establishment files should be removed from the sample only if:

- The establishment has not been in business long enough to have at least three routine inspections; or
- Files in which no risk factor or public health intervention violation was documented on the “start-point” inspection.

When an establishment file is eliminated from the initial random draw, a new establishment file must be selected using the random selection methodology used for the original sample. The *Establishment File Worksheet* contains a specific page for listing the results from the randomly selected substitute establishment files. If there is a need to identify other substitute establishment files, continue to use the randomly generated numbers in the order they appear to identify the corresponding establishments from the jurisdiction's inventory. The file number and the name of the originally selected

establishment that did not qualify for the self-assessment review process must be recorded under the first column of the “Substitute Establishment” summary worksheet. This provides a direct association between the newly selected establishment file and the one it is replacing.

**STEP 3 – Determine if the Standard 6 criteria are met**

Standard 6 requires that 80 percent of the reviewed files adhere to the jurisdiction’s written compliance and enforcement procedures. Files that “did not qualify” (D.N.Q.) for the self-assessment review are not included in the calculation for this percentage. The self-assessor must determine if 80% of the establishment files reviewed met the Standard 6 criteria.

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**Standard 6: Compliance and Enforcement  
Self-Assessment Summary Worksheet  
Establishment Files**

**Jurisdiction Name:**

Number of Files Selected	Randomly Selected Number	Name or ID of Establishment	Yes	No	Does Not Qualify	Self-Assessor's General Comments
1			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Standard 6: Compliance and Enforcement  
Self-Assessment Summary Worksheet  
Establishment Files**

**Jurisdiction Name:**

Number of Files Selected	Randomly Selected Number	Name or ID of Establishment	Yes	No	Does Not Qualify	Self-Assessor's General Comments
11			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



**Standard 6: Compliance and Enforcement  
Self-Assessment Summary Worksheet  
Establishment Files**

**Jurisdiction Name:**

Number of Files Selected	Randomly Selected Number	Name or ID of Establishment	Yes	No	Does Not Qualify	Self-Assessor's General Comments
21			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
22			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
24			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
26			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
28			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
29			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
30			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Standard 6: Compliance and Enforcement  
Self-Assessment Summary Worksheet  
Establishment Files**

**Jurisdiction Name:**

Number of Files Selected	Randomly Selected Number	Name or ID of Establishment	Yes	No	Does Not Qualify	Self-Assessor's General Comments
31			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
33			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
34			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
35			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
36			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
37			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
38			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
39			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
40			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Standard 6: Compliance and Enforcement  
Self-Assessment Summary Worksheet  
Establishment Files**

**Jurisdiction Name:**

Number of Files Selected	Randomly Selected Number	Name or ID of Establishment	Yes	No	Does Not Qualify	Self-Assessor's General Comments
41			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
42			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
43			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
44			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
45			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
46			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
47			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
48			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
49			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
50			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Standard 6: Compliance and Enforcement  
Self-Assessment Summary Worksheet  
Establishment Files**

**Jurisdiction Name:**

Number of Files Selected	Randomly Selected Number	Name or ID of Establishment	Yes	No	Does Not Qualify	Self-Assessor's General Comments
51			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
52			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
53			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
54			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
55			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
56			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
57			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
58			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
59			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
60			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Standard 6: Compliance and Enforcement  
Self-Assessment Summary Worksheet  
Establishment Files**

**Jurisdiction Name:**

Number of Files Selected	Randomly Selected Number	Name or ID of Establishment	Yes	No	Does Not Qualify	Self-Assessor's General Comments
61			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
62			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
63			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
64			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
65			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
66			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
67			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
68			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
69			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
70			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Standard 6: Compliance and Enforcement  
Self-Assessment Summary Worksheet  
Establishment Files**

**Jurisdiction Name:**

Number of Files Selected	Randomly Selected Number	Name or ID of Establishment	Yes	No	Does Not Qualify	Self-Assessor's General Comments
1			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Standard 6: Compliance and Enforcement  
Self-Assessment Summary Worksheet  
Substitute Establishment Files**

**Jurisdiction Name:**

Number of Files Selected	Randomly Selected Number	Name or ID of Establishment	Yes	No	Does Not Qualify	Self-Assessor's General Comments
11			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Standard 6: Compliance and Enforcement**

**Establishment File Worksheet**

File Number:  Establishment Name:  Permit Number:  Inspection Date (Start Point):

**Risk Factor and *Food Code* Interventions**

	Unsafe Source	Inadequate Cooking	Improper Holding Temperatures Hot & Cold	Time/Temperature Parameters not Met (Time as a Control, date marking, rapid cooling)	Bare Hand Contact with Ready-to-Eat Food	Poor Personal Hygiene	Contaminated Food Contact Surface & Equipment	Consumer Advisory (when required)	Demonstration of Knowledge by PIC	Employee Health Control system or policy implemented
Reference to local inspection items										
Start Point Inspection Violations										
Was on-site corrective action taken?										
Was follow-up corrective action taken?										
Was enforcement action taken?										

**Note:**

1. Each column in which a violation is noted must receive a yes response to one of the three questions in order for the file to pass. Additionally, written procedures must have been followed.

<b>Was the Written Procedure Followed?</b>	<b>YES</b> <input type="checkbox"/>	<b>NO</b> <input type="checkbox"/>
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**Jurisdictions definitions of acronyms and notations used to reflect follow-up action**

Acronym / Notation	Definitions	Acronym / Notation	Definitions	Acronym / Notation	Definitions

**Select One**

File Meets the Standard 6 Criteria:

File Does **NOT** Meet the Standard 6 Criteria:



