

# Conference for Food Protection Inspection Scoring Committee

Assumptions	Need to Address 1 =Little or no need, 5=Most Important					Comments
	1	2	3	4	5	
The health jurisdictions program includes inspector and industry training.		1	1	6	8	<ul style="list-style-type: none"> <li>• Would like to see more interaction with training with industry</li> <li>• Standardization is critical to the success of any inspection/grading program</li> <li>• While this is important, this does not specifically relate to the charge</li> <li>• It is important for the regulatory community and industry to have the same information and understanding of regulations</li> <li>• Standardization for health jurisdictions-the inspection staff must be trained on CDC risk factors so grades will be consistent, accurate, and meaningful.</li> <li>• Florida Statute mandates 20 CEU's for inspectors annually. Food Manager Certification has been mandated in Florida since 1992 and Food Employee Training since 1996.</li> <li>• Our agency believes training for operations is very important. We provide training as requested, but find better operations are the ones that request. We also have a large number of for profit training providers which makes our providing the training less essential</li> <li>• MA regulations require Food Inspector Training and Food Manager Certification</li> <li>• For a grading system to be successful the inspection staff must be trained on CDC risk factors so grading will be accurate and uniform.</li> </ul>
The scoring system is easy for the health inspector, the public and regulated industry to understand.				9	7	<ul style="list-style-type: none"> <li>• Online systems should be universal. Consistent scoring would help</li> <li>• There should be standardization of scoring/grading systems. Few of the systems are "apples to apples" so this is hard for industry and the general public to understand the differences</li> <li>• Ability to correct or address score needs to be included. Waiting on next scheduled routine inspection is not a good practice for anyone</li> <li>• Must be risk-based and supported by science</li> </ul>

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<p>The inspector's performance is standardized on an ongoing basis.</p>		1	1	6	8	<ul style="list-style-type: none"> <li>• Do not know. But I see inconsistent performance from jurisdiction to jurisdiction</li> <li>• On-going standardization must be a component of any program</li> <li>• Very important, but not relevant to the charge of the committee</li> <li>• Standardization of the program and scoring would go a long way in standardizing an inspectors performance.</li> <li>• Participating within FDA Program Standards should be required</li> <li>• The division currently meets FDA Standard #2 and was successfully audited in 2008</li> <li>• Not done by state here currently, but we recognize the need and work frequently with our staff in the field to monitor performance.</li> <li>• This is a challenge in MA with 351 local boards of health</li> <li>• FDA Program Standards should be required</li> </ul>
<p>The jurisdiction is using a risk based food code that requires effective control of CDC risk factors.</p>		1	1	5	9	<ul style="list-style-type: none"> <li>• LA County is a good model</li> <li>• Participation in the FDA Program Standards is an essential component</li> <li>• To make the scoring uniform, then all jurisdictions should be on the same page when completing the inspections</li> <li>• YES!</li> <li>• Current Food Code should be used and emphasized</li> <li>• The division implemented the CFP risk-based inspection form and process in 2007</li> <li>• Systems that result in low scores because floors, walls, and ceilings aren't clean don't provide the best help to citizens looking for a safe place to dine</li> <li>• MA currently adopts by reference the federal 1999 Food Code and is enrolled in the FDA Voluntary Retail Food Regulatory Program Standards</li> <li>• Should be latest version of FDA Food Code or equivalent</li> </ul>
<p>The health department regularly evaluates their inspection program results using a consistent and effective methodology.</p>			6	6	4	<ul style="list-style-type: none"> <li>• Need to have a consistent training and enforcement across jurisdictions</li> <li>• Participation in the FDA Program Standards is an essential component</li> <li>• The division has been enrolled in the FDA Program Standards since 2001 and has been successfully audited and currently meets 5 of the standards</li> <li>• Not unimportant, but not as critical once a good system is in place. It is</li> </ul>

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						<p>more critical to ensure consistency among staff at that point</p> <ul style="list-style-type: none"> <li>• This is a challenge in MA with 351 local boards of health</li> </ul>
<p>The public receives the sanitation scores in a way that allows them to make informed decisions about where they would like to eat.</p>			<p>4</p>	<p>6</p>	<p>6</p>	<ul style="list-style-type: none"> <li>• The Online system needs to be easy to use and consistent formatting</li> <li>• Public education on what a grade/score represents is an important component of a successful program</li> <li>• Any information provided to the public (internet posting) should be clear on the violation. One example that may not be clear and is frequently noted on inspections is a violation noted for vermin, when in fact it could be something as simple as needing new weather stripping versus the actual presence of vermin</li> <li>• Message must emphasize and include that some minimum level/score of food establishment means it's safe for consumers</li> <li>• The division licenses and inspects all of Florida's 45,327 restaurants. All inspection results are posted online and updated daily for the public to view</li> <li>• Otherwise it is a futile effort. But while you can educate the public on what the scores mean, they ultimately will make their own interpretations. The media can have a great deal of impact on how data is taken</li> <li>• Public education on what the score means is necessary</li> <li>• It must be clear that regardless of the score the food establishment is safe for consumers.</li> </ul>

1. Are there other relevant items that the Committee should consider?

- Yes, but there is not enough space to provide
- Electronic inspections rather than paper/pen – making the scoring process easier
- I deal with different health departments across the country, and can see the inconsistencies in enforcement, communication, training, partnership. I would like to see a more uniform system, of training, cooperation, enforcement with the ultimate result of the best and safest methods of providing food for consumption
- Whenever implementing a grading program, it is critical that objectives be established as to the purpose of the program. In addition, standardization and training is a key component to the program's success. Educating consumers as to the objectives of the grading program is also critical. The grade/score is based on a "snap shot of time" and often may not correspond to the "normal" activities of the food establishment, so it is critical that there be a process to request another inspection so that the "grade/score" doesn't become punitive.
- Assess what is included within the voluntary standards and if/what can be applied to this issue
- These are the concerns that I would like to help this committee address along with a few of the reasons why the Division of Hotels and Restaurants does not grade, rate, or otherwise subjectively quantify inspection results in its 45,327 establishments:
  - Not endorsed by CFP or FDA.
  - No peer reviewed science concluding a positive public health impact.
  - Oversimplifies a complex subject and process.
  - Ignores dynamics of foodservice environment – change for better or worse can occur within hours.
  - Ignores changes in ownership, management, and safety.
  - May not reflect true past performance – does not guarantee future performance.
  - Creates adversarial relationship diminishing effectiveness in educating operators.
  - Inspection reports are public record, available on Internet.
- I think this charge is a good one  
NC has adopted some Food Code language, but is not a Food Code state. We currently post a score that contains both a letter and numerical score. We are moving toward adoption of the 2009 Food Code by July 1, 2012. We will have a scoring mechanism in place with the 2012 adoption. I would prefer there to be a system that is better suited than the one we currently have in the works if not in place.  
Adoption of a multi-jurisdictional system would likely be more positive than having 50+ systems that vary from state to state.  
I would like to see progress on this issue.
- Massachusetts would be interested in a system that can be voluntarily adopted by individual jurisdictions.
- The objective for a grading system must be clearly identified and the outcome measurable. Is it to reduce risk factors, reduce illness, increase compliance, etc? The DPH and municipalities that participate must provide accurate inspection data to help quantify whether the grading system is achieving it's stated objective.

There must be "building blocks" in place prior to implementation or the grades will be meaningless. Very similar to what GMP's, GRP's and SOP's were to HACCP, the building blocks for a state wide grading system is having knowledgeable, trained, and standardized inspectors resulting in uniform inspections.

The grading system should acknowledge those food establishments that have a food safety system in place. That system can include, internal food safety staff, associate and manager training, written policies that control risk factors, and internal self- inspections or audits.

The grading system must be user friendly and based on sound science and CDC risk factors. No grading system should insinuate that a food establishment is not safe for customers. **All food establishments who are inspected and allowed to stay open should be considered safe.**

There should be an appeal or re-inspection process available to those that do not get a high grade. Many communities only conduct inspections once or twice a year. A poor grade that day (couple of hours during an inspection) might not be reflective of the establishment performance during the whole year. A re-inspection should be available upon request to any food establishment that request one, and that the new rating is posted.

The grading system must be legally defensible. Will the local or state health departments be liable for "unjust" loss of business due to this rating system. Posting scores or inspection reports are part of the freedom of information act, but attaching a subjective rating that might be misleading to consumers, might cause legal issues.

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- The Committee needs to keep in mind that we are talking about a potential national model. Whatever model is discussed or studied should include the element of varying jurisdiction size, population served, individual statutory language.

2. Why did you sign up for this committee and what do you hope it achieves?

- So our committee can recommend a scoring system to the conference. National scoring system would help coordinate resources appropriately
- For universal and consistent scoring mechanism
- I would like to strengthen the Food Safety program for our entire US supply chain. Effective communication and training from regulatory to industry, consistent and universal food code.
- Many states that I work with are in the process of adopting the CFP form and have a grading method already in place. It would be helpful to them to use a graded CFP form in lieu of developing their own.
- I am very interested in being involved in creating a standardized, credible, useful scoring system for food establishments. I believe this will provide tremendous value to the public as well as conscientious food service establishments.
- Grading/scoring programs continue to be implemented by regulatory agencies in numerous states. It is essential that there be a uniform inspection form that is available to these regulatory agencies so that it minimizes the potential confusion for not only consumers, but also retail food establishments.
- Started with this committee many years ago, and would like to see the process come to completeness. Would like to participate in framing the scoring of inspection reports that would be easy for the public and the user to understand
- To participate and contribute to improving systems that would be beneficial to the public, regulatory agencies, and to the industry, especially those of us who operate in several states/jurisdictions.
- Strive towards easy to understand, applicable, consistent, and reproducible solutions
- I believe this is the next continuous improvement step for those jurisdictions that have adopted the CFP/FDA risk-based inspection system and would like to see it uniformly and consistently implemented across the nation.
- Interest in scoring for Health Department Inspections to be more uniform throughout the country
- We are in the process of reviewing our food safety standards, and will be (hopefully) reviewing and revising our scoring system. We have tried unsuccessfully in the past to change our scoring system and I am interested in participating on the committee to provide input but also to see what I can learn to help us at the state level.
- Massachusetts Dept. of Public Health, Food Protection Program is in the process of revising the retail food establishment regulations and inspection report form. Implementation of a uniform food establishment grading system with both on-site posting of grades and interest of full inspection results is of interest
- Since posting of scores directly affects my business, I want to be sure it is accomplished uniformly, based on CDC risk factors by trained and standardized inspectors, so that clear and meaningful information is given to consumers
- Continuation from previous committee and inspection form committee.

3. Other comments

- I don't understand why we are asking to address items in the FDA program standards.
- Regardless of grading system, it should not insinuate the establishment is unsafe. We should consider how you can effectively communicate if a food establishment is allowed to remain open, the immediate safety is not in question