**Standard 6: Compliance and Enforcement**

**Standard Operating Procedure**

**7/7/2016**

* Who will do the assessment? Supervisor? Quality Assurance
* Frequency: Every self-assessment period (five years).

**Assessment of the Effectiveness of the Compliance and Enforcement Program:**

* Use the Self-Assessment Summary Worksheet and Establishment File Worksheet simultaneously.
  + Part I Determine the number of establishment files to review
    - Number of establishments: 2695
    - Number of files to review: 70

[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
    - Random number generator: In Microsoft Excel, type 1 to number of establishment (e.g. 1000) in column 1; Then type “=RAND()” in column 2 and expand it till the number of establishments. Now custom sort by column 2 (random numbers) and select first required number of establishments. (e.g. first 70) **(Depends on how the files are stored.)**
    - 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.
    - 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
    - Fill out the Establishment File Worksheet using following procedure.
    - **Step1:**
    - Start Point Inspection Date:
      1. This date will be the third oldest routine inspection file for the selected establishment if it shows a violation of one of the ten risk factors or public health interventions.
      2. If no risk factor or public health intervention violation is shown on that inspection, then the fourth oldest routine inspection will be used if it shows a risk factor or public health intervention violation.
      3. If no violation of a risk factor or public health intervention is documented on the third or fourth oldest routine inspection, then the file for this establishment does not qualify for the self-assessment review process.
      4. If the establishment does not qualify, the self-assessor must check the “Does Not Qualify” box in the Self-Assessment Summary Worksheet and remove the file from the review process. A substitute establishment file must be chosen using the second set of randomly selected numbers to replace this file.
    - **Step2:**
* 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 corresponding to each of the ten factors and interventions under the title “Reference to local inspection items”.
* **Step3:**
* Mark the observed violation out of ten risk factors in under the title “Start Point Inspection Violation”.
* **Step4:**
* For the violation marked, the self-assessor must select any one of the following based on the action taken.
  1. Was on-site corrective action taken? (At the time of inspection)
  2. Was follow-up corrective action taken? (During follow up inspections)
  3. Was enforcement action taken? (May include fine, permit suspension, hearing, restriction of operation, mandated training etc.)
* **Step5:**
* The self-assessor must determine if the follow-up actions complied with the agency’s written procedures.
* **Step6:**
* 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.
* **Step7:**
* The self-assessor should select 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 should select 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.
* **Step8:** Self-Assessment Summary Worksheet
* When the review for each randomly selected establishment file is completed, 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.
* “Does not qualify” – indicating that the establishment file did not qualify for the assessment and a substitute file will need to be randomly selected and reviewed.
* Documentation:

Standard 6: Self-Assessment Summary Worksheet

Standard 6: Establishment File Worksheet