

Virtual Inspections of Food Service Establishments Through Risk-Based Inspections



When conducting inspections of food service establishments, it is important that local health departments (LHDs) utilize risk-based inspection methods (RBIs) to focus on factors that are directly related to public health. The basis of RBIs is to observe behaviors, practices, and procedures that could lead to poorly-managed risk factors and to look at the whole food establishment as a system rather than individual components.

However, it may not be possible for these specific tasks of RBI methods to be reasonably conducted within a virtual setting, a challenge that many LHDs experienced during the COVID-19 pandemic. Although virtual inspections can provide an opportunity for regulatory activity to continue during a public health emergency, determining the most effective way to utilize this practice is essential.

Challenges with Virtual Inspections

REGULATORS

- » Are unable to conduct a quick walk-through prior to the inspection or set an example by washing hands and sanitizing equipment.
- » Are unable to assess smells in the establishment.
- » Have limited range of vision.

OPERATORS

- » Require a strong internet connection, which may not be present in all food service establishments. Identify steps for surveillance and response to biological and chemical water contamination.
- » Limited staffing may make it difficult for the food managers to be available for food inspection.

Despite RBI being an essential component of retail food regulation, shifting virtual inspections from a regulatory to a more assistance-oriented focus may be more beneficial to public health, especially during a public health emergency such as COVID-19. Although there are several challenges with conducting virtual inspections, they do offer an opportunity to [continue routine food safety practices during a public health emergency](#) and have the advantage of making sure that the right people are available at the time of the inspection. The goal should be to determine the appropriate situation to implement virtual inspections to maximize the effectiveness of public health measures.

Recommendations

Shift Towards an Educational Approach

- Have an open discussion in which food retail managers and operators can ask questions to gain knowledge.
- Identify and solve problems without fear of being fined for violations or documented as not complying with food safety procedures.
- Use virtual inspections to strengthen public health messaging
 - » For example, retail food regulators should ensure that the primary method of communication used (written or verbal) is understood and accessible by food service workers and should establish an open dialogue to foster partnership.
 - » Effective public health messaging should include the telling of stories that are applicable to the food service workers and show an understanding of their situation.

Risk Based Inspections

Observes behaviors, practices, and procedures that could lead to poorly-managed risk factors. Looks at the whole food establishment as a system rather than individual components.

The Centers for Disease Control and Prevention Foodborne Illness Risk Factors

- Food from unsafe sources
- Inadequate cooking
- Improper hot/cold holding temperatures
- Contaminated equipment
- Poor personal hygiene

[CHECKLIST]

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Use Food Safety Culture to Prioritize In-Person vs. Virtual Inspections

- Target food service operations that are low-risk and maintain a positive food safety culture for virtual inspections, particularly during public health emergencies.
- Limit in-person inspections to high-risk food service operations, or those that were previously determined to be out-of-compliance.
 - » It is important that high-risk operations have in-person regulatory visits, as this allows for the most direct observation of risk factors and the food service operation as a whole. High-risk operations likely do not have behaviors or practices that support a positive food safety culture, and it is therefore important to focus on these establishments even when resources are limited.
- In accordance with the U.S. Food and Drug Administration's (FDA's) *New Era of Smarter Food Safety*, educate inspectors on characteristics that indicate a facility has a strong food safety culture and determining how food safety culture can influence the frequency and structure of inspections.
- Enhanced data analytics and information gathering can be utilized to look at ways of prioritizing high-risk establishments for physical inspections.

Limited Scope Inspections focused on the following items which could be also used as a recommended checklist for virtual inspections (derived from the South Carolina Department of Health and Environmental Control):

- Hands clean and properly washed
- No bare hand contact with RTE foods / Gloves used properly
- Food obtained from approved source
- Proper Cooking temperatures
- Proper hot holding temperatures
- Proper cold holding temperatures
- Time as a public health control
- Proper cooling time and temperature
- Proper reheating procedures for hot holding
- Proper date marking and disposition
- Food-contact and non-food-contact surfaces (cleaned and sanitized)
- Thermometers and test kits provided and accurate
- Towel sanitizer solution
- Shell stock tags maintained
- Plumbing (Water/Wastewater)
- Pest Control
- Special Processes: Sushi Rice, ROP, Sous Vide, Cook, Chill, etc.

Highlights from the field featuring the South Carolina Department of Health and Environmental Control

- Used virtual inspections as a Limited Scope inspection (LSI) during an emergency period.
- LSI graded as a Pass/Fail. A retail food establishment must not have more than 3 violations, of any level, that cannot be corrected during the inspection.
- LSI was also used for educational purposes and for compliance assistance.

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