1. PURPOSE

The purpose of this policy is to provide the requirements for the inspection of a Manufacturing, Distributing, and/or Wholesale Food Firm currently regulated by the Minnesota Department of Agriculture Dairy and Food Inspection Division (MDA-DFID).

2. SCOPE

This policy applies to all Minnesota State Food Inspectors of Manufacturing, Distributing, and Wholesale Food Firms, including inspections conducted under contract with the Food and Drug Administration Inspectors are required to follow this protocol unless the inspection is not covered in the policy.

The policy does not include additional requirements for specific types of inspections such as foodborne illness investigations, complaints, licensing and sampling. This policy also does not apply to meat or dairy firms regulated under MDA-DFID who fall under the USDA or Equal-to inspection programs or the Pasteurized Milk Ordinance.

3. BACKGROUND

Minnesota Statute, 31.04, 31.08, 34A.04, 34A.12 (and any other applicable laws and regulations) provides the legal authority for Department staff to enter, inspect, copy records, take photographs and sample to determine compliance with the Minnesota laws including, but not limited to, MN Chapters 17, 28, 28A, 29, 30, 31, 31A, 32 and 34A and Agency rules promulgated there under.

This document was established using existing Dairy and Food Inspection Division policies. This protocol complies with the requirements stated in the Manufactured Food Regulatory Program Standards under Standard 3 section 3.3.b.
4. RESPONSIBILITY

**Food Program Manager** – The Food Program Manager will review all policies and procedures and issue final approval of all food program policies and procedures.

**Regulatory, Educational and Outreach Program Coordinator** – The Regulatory, Educational and Outreach Program Coordinator will ensure that all staff are trained in carrying out the responsibilities of this SOP.

**Supervisor** - The Supervisor will ensure all assigned staff in their respective program area receive the appropriate training and follow the procedures described.

**Inspector** – The Inspector will follow the procedures described as applicable to their position and notify their supervisor when the procedures cannot be followed.

5. DEFINITIONS

**FDA Contract Inspection Template**: Also referred to as the *FDA/MDA Summary of the Contract Inspection & Discussion with Management*. The Template is a form used for completing FDA contract inspections. The areas on the form include the Endorsement, Inspection Results, HACCP Plan Review and Discussion with Management Sections.

**Good Manufacturing Practices (GMP)**: a set of federal regulations 21 CFR 110 that apply to all food processors, distributors, and warehouses. They are the basis for determining whether the practices, conditions, and controls used to process, handle or store food products are safe and whether the conditions in the facility are sanitary.

**Hazard Analysis Critical Control Point (HACCP) Based Inspection**: An inspection conducted utilizing scientific knowledge and direct observation to evaluate a firm’s food handling activities including processing, storage and distribution. An inspector identifies and then assesses hazardous ‘points’ in the process, the amount of control over those hazardous points, and documentation of the hazards, process, and any monitoring conducted by the firm.

**Highly Susceptible Population**: Persons who are more likely than other people in the general population to experience foodborne disease because they are:
1) Immunocompromised: those having an impaired immune system and therefore more susceptible to foodborne pathogens; and
2) Obtaining food at a facility that provides services such as custodial care, health care, or assisted living, such as a child or adult day care center, kidney dialysis center, hospital or nursing home, or nutritional or socialization services such as a senior center or school.

**Most Responsible Person (MRP)**: Owner, operator, or agent who is present at the firm and is responsible for the operation at the time of inspection.

**Ready to Eat (RTE)**: "Ready-to-eat food" means food that is in a form that is edible without additional washing, cooking, or other preparation by the firm or the consumer to achieve food
safety and that is reasonably expected to be consumed in that form. It may receive additional preparation for palatability or aesthetic, epicurean, gastronomic, or culinary purposes.

Risk Factors: practices or procedures that pose the greatest potential for foodborne illness. Risk factors as determined by the CDC and FDA are Food Source, Inadequate Cooking, Improper Holding Temperatures, Cross Contamination, Poor Personal Hygiene, and Environmental Contamination.

Specialized Process: Foods produced under 21 CFR, parts 113 (LACF), 114 (AF), 120 (Juice), and 123 (Seafood).

6 PROCEDURE

6.1 Pre-Inspection

6.1.1 Bring the appropriate equipment and forms to the Inspection. Refer to the Food Inspection Supplies, Forms, and Equipment Checklist.

6.1.2 Insure all footwear and protective outer garments are free from contamination before entering a facility that processes or repackages food.

   a. Clean footwear and protective outer garments must be carried into the firm in sealed zip top bags.
   b. Footwear and outer garments must be cleaned and/or sanitized (as appropriate) between firms or inspection days.
   c. Follow firm’s standard procedures if they have additional hygiene requirements such as rubber boots or footbaths.

6.1.3 Review all files before going to the establishment.

   a. Determine hours and season of operation as necessary
   b. The following documentation should be noted (if present): out-of-compliance observations, repeat orders, chronic violations, second notices, complaint reports, documentation indicating a need for a HACCP Plan, document verifying the last water test, letters or court documents regarding any enforcement actions that may require follow up including warning letters, and violative sample letters or reports.
   c. For FDA Contract Inspections, review the eSAF Inspection Sheet. The eSAF Inspection Sheet must be submitted to the appropriate supervisor upon completion of the inspection.
   d. Contact supervisor or previous inspector (if available) for clarification of any information contained within the firm’s file as necessary.
6.2 Initial Interview

6.2.1 Upon entry to the facility:

a. Identify oneself, present credentials and explain the purpose of the inspection to the most responsible person.
b. Issue a Notice of Inspection (NOI) following the Notice of Inspection SOP.
c. Verify the license type, name, location address, mailing address, and fee paid are correct.
d. Determine if the firm is registered under the Bioterrorism Act. Document this information in the report. However, do not document the Bioterrorism Number. If the registration status is unknown, provide information regarding registration.

6.2.2 Consider the inspection as a refusal of inspection if the firm does not allow any of the following: entry into the facility, entry into specific facility areas, review of records, collection of samples, or photo documentation. It is also considered a refusal of inspection if the firm in uncooperative or hostile.

a. Provide the firm with the statutory authority references, such as: MS 31.04, 31.02(g), 34A.04, 34A.12; or for taking pictures, cite the IOM’s two case laws, in section 5.3.4.1.
b. Inform the firm that MDA will initiate appropriate legal action. If the firm continues to refuse, complete an inspection report stating the refusal of inspection and the details of the refusal. Then, contact a supervisor or someone else in management. Management will determine if immediate access is necessary and take appropriate action.

6.2.3 If a FDA contract inspection is being conducted, establish FDA jurisdiction by verifying products or ingredients enter into or are received via interstate commerce e.g. from a country, state, or territory other than Minnesota.

a. This information can be verified by a transportation record document, examining products or ingredients and their associated label in the firm, or by obtaining this information from the MRP.
b. Document the product, address, and name of supplier or customer on the FDA Contract Inspection Template.

6.3 Focus of Inspection

6.3.1 Determine the focus of the inspection based on the purpose of inspection (routine, complaint, licensing, sampling, etc.) and by assessing the facility.
6.3.2 A menu and product review should be done to select the highest risk foods to evaluate. Refer to the Manufacturer and Distributor Risk SOP to determine the highest risk foods.

6.3.3 Evaluate the following information to help assess the focus of the inspection:

a. Products being produced on the day of inspection.
b. Intended use of the products.
c. Time of processing of specific products.
d. Type of packaging being used.
e. Intended Storage Temperature: Ambient, Refrigeration, or Frozen.
f. Intended consumer(s) of these products: General Public or Highly Susceptible Population.
g. Potential hazards associated with the food.
h. Sanitation Practices.
i. Process/ Product flow: Raw to RTE.
j. Specialized Processes

6.3.4 Focus may be changed if a significant violation is observed.

6.3.5 Make an assessment of the overall operation even though the detailed inspection focus is on the selected product.

6.4 Walk-through activities

6.4.1 Conduct a walk-through of the facility, including a review of the exterior portion of the facility.

6.4.2 Assess the methods, facilities, and controls used in manufacturing, storage, and distribution of foods. This includes onsite facilities and vehicles owned or leased by the firm being inspected.

6.4.3 Cover each step of the process during the walk through, including: receipt of raw materials, storage of raw materials, processing product, storage of finished goods, shipment of products, and sanitary practices and conditions.

6.4.4 A flow diagram for the product or focus of inspection should be completed as a worksheet to identify each process step and the procedures completed at each step. This may include: critical factors, control points, critical control points, and process timing. If flow diagram was completed previously, verify the accuracy of the diagram and update as needed.

6.4.5 Demonstrate proper sanitary practices during the inspection. This would include following the GMP’s as well as any additional requirements the firm may have in regards to personal hygiene, safety, and sanitation.
6.4.6 Evaluate employee activities critical to safe and sanitary production and storage of food. Provisions used for assessing these activities can be found in 21 CFR, Part 110.10: disease control, cleanliness, education/training, and appropriate supervision. The following observations or assessments must be made throughout the inspection:

a. Firm’s procedure(s) regarding employee cleanliness and sanitation.

b. Flow of employee traffic: entrance(s) to the processing area, location of locker room(s) and bathrooms, locations of different work stations, raw product areas vs. finished product areas, employee movement into different processing areas, and any other areas that may affect the safe and sanitary production and storage of food.

c. Employees’ uniform and dress including but not limited to: shirts, pants, jackets, lab coats, shoes, jewelry, hairnets, gloves, and any other piece of clothing that could contribute to an unsanitary production and storage of food.

d. Employees’ actions including but not limited to: hand washing, cross contamination of food contact surfaces with nonfood contact surfaces, and good hygienic practices.

e. Documentation of employee training regarding sanitary practices.

f. Oversight and routine monitoring of proper employees practices.

6.4.7 Assess the likelihood that conditions, practices, components, and/or labeling could cause product to be adulterated or misbranded.

a. The GMP Checklist may be used as a guide to record observations connected to potential product adulterations.

b. Connect observations made to potential product adulteration. A single observation may be only “part of the story”.

c. Perform one Reconciliation Exam for facilities that receive ingredients in bulk. Bulk ingredients may be tanks, super sacks, large drums, etc. Bulk ingredients do not include 50lbs or less, multiple individual units contained on a pallet, etc. Select a bulk ingredient shipment and verify the identity, quantity, condition, and labeling. Verify the goods are the same as the shipping documents. If discrepancies are found, assess the situation and work with the firm to determine how product is used. Information may be documented in the comments sections of inspection report.

d. Observe the condition of the labeling area, labeling equipment, and conveyor equipment.

e. Evaluate labels for accurate declarations of ingredients by reviewing the formula and raw material labeling and by observing ingredients being staged and/or batched/mixed during production. Reference the Nutritional Labeling and Education Act (NLEA) for more information regarding labeling as needed.

f. Verify allergen labeling on raw materials, products in process, and finished goods.
g. Review allergen policies at the facility, possible cross contamination issues, and possible undeclared allergens.

h. The Allergen Guidance Document Form must be completed as a worksheet during the walk through if the firm processes any food with allergenic ingredients.

6.4.8 Recognize violative conditions and practices if present and record findings.

a. Observe the processing of the product selected for the inspection focus. Place emphasis on the risk factors related to the processes and controls for the specific products observed. See 21 CFR 110.80 for processing control requirements and 21 CFR 110.35 for sanitary operations.

b. Perform a HACCP based inspection which identifies hazards specific to the selected product, critical control points in the process, and potential areas for contamination or adulteration related to product handling and the processing environment. This could include: evaluation of the firm’s quality assurance program, standard operating procedures in place to address potential hazards and sanitation, and/or review controls in place to address identified hazards.

c. Written observations should record specific areas or situations that would lead to instances of actual or potential adulteration of food products.

d. Examples of Violative Conditions and Practices are: Presence of old food residue and mold on a food contact surface, employee handling RTE product with soiled hands, rodent or insect contaminated foods, non-food grade machine lubricant being used on machinery over food contact surfaces, cooler dripping condensate on food or food contact surfaces, undeclared allergens, or cumulative time/temp abuse occurring during the cooling or storage of a potentially hazardous food.

6.4.9 Distinguish between significant vs. insignificant observations and isolated incidents vs. trends.

a. Determine which observed violations are significant; those which are closely linked to public health risk and/or product adulteration.

b. Take appropriate intervention measures and/or corrective actions for each significant observation that is determined to be out of compliance. Public health risks and instances of product adulteration require immediate onsite correction of the deficiency as well as disposition for products of concern. This may require a discussion with a Food Inspection Supervisor, issuing a Sanitary Notice, or placing an embargo on products of concern.

c. Emphasis during the inspection must be placed on deficiencies related to significant violations. Insignificant violations should also
be addressed. However, they should be addressed after more significant deficiencies are discussed with the firm.

d. Examples of significant vs. insignificant observations: focusing on areas where cross contamination of cooked and raw products might occur should occur prior to addressing a food employee chewing gum and wearing nail polish, or emphasizing RTE salad processing and handling before addressing soiled non-food contact surfaces.

e. Examples of isolated incident vs. trends observations: Identify patterns in documentation over time rather than focusing on single incidences that were corrected and not repeated, observe employee handling practices across different products that create a potential for contamination and indicate deficiencies with monitoring of employee practices, identify sanitation deficiencies in similar areas of production related to facility construction or layout.

6.4.10 Review and evaluate the appropriate records along with applicable written and observed procedures for the establishment’s operations and effectively apply the information obtained during the inspection.

a. Conduct a record review after the initial or complete walk-through of the facility and document this information on the inspection report.

b. Review records since the last inspection to correlate patterns, identify items that have been addressed by the firm, and verify potential process deviations that may have occurred since the last inspection. Additional records may be needed for review based on specialized processes, risk level, or production volume. Considerations for record selection may be: reviewing consecutive days of records, records of production on/before/after holidays, at the start of a season, end of a season, etc.

c. Identify records which are applicable to the focus of the inspection either prior or during the walk through. Correlate the records reviewed to observations taken during the walk-through.

d. Discuss recall procedures with the firm. This includes: trigger for the firm to recall product, Reportable Food Registry knowledge, sources of recall information, any corrective actions taken at the firm, follow up performed with other customers if necessary, mock recall activity, and handling of recalled product.

e. Records requested may include but are not limited to: Cooking and Cooling logs, Sanitation Monitoring, Employee illness, Water Source Approval, Backflow Prevention, Control Point Records, Receiving documents, Environmental Sampling Results, Pest Control Monitoring, Finished Product Testing Results, Training Records, Documentation of Chemical Approvals especially for those used in sanitation and food processing, Packaging Material Specifications, Mock Recall Results, and/or Calibration Records. May refer to the Document/Records Request form.
6.4.11 Collect adequate evidence and documentation to support inspection observations.

a. Collect evidence to fully support observations if significant violative conditions are identified within the firm. Evidence collection will vary depending on the type of observation requiring support.

b. The following types of evidence may be collected, however are not limited to: copies of records, photographs and video, samples of finished goods, packaging, the environment, raw materials, and any other food material, and rodent/insect evidence.

c. Samples must be collected according to the applicable sampling procedures or guidance.

d. Records collected as evidence must be submitted with the Inspection Report. If the records contain proprietary or confidential information, the firm must mark the document as such.

e. Photographs should be representative of the conditions observed during the inspection and should represent the conditions observed during the inspection. The scope of the photograph should be identified through the variation of close up photographs and large encompassing views. Refer to the Digital Media SOP for handling of digital media and appropriate documentation.

f. Examples of evidence collection to support significant violative conditions could include: copies of records noting deficiencies in monitoring of critical limits, finished product with an unacceptable finished pH, damaged packaging in support of insect infestation, photographs of insanitary food contact surfaces or processing environment conditions.

6.4.12 Verify that corrections have been made to the deficiencies identified during the previous inspection.

a. Review all previously identified deficiencies during the current inspection.

b. If the previous deficiencies have not been corrected, repeat orders must be issued in the inspection report.

6.4.13 Determine if a Reinspection or Follow-up Inspection is necessary.

a. Refer to Reinspection and Follow-up Inspections SOP.

6.5 Communication and Behavior

6.5.1 Behave professionally throughout the inspection.

a. Do not discuss information regarding other firms’ businesses, processes, or practices.
b. Do not speak to other agencies’ activities or policies, including notification of inspection, work plans, inspection procedures, etc.

c. Dress appropriately for the activities.

d. Maintain a dignified, tactful, courteous, and diplomatic attitude.

e. Observe accurately and objectively.

f. See also MN Statute 43A.38 - Code of Ethics for Employees in the Executive Branch.

6.5.2 Make appropriate introductions and explain the purpose of the questions being asked to any employees interviewed during the inspection.

6.5.3 Do not sign any forms or documentation provided by the firm that limits the inspection authority and/or rights to gather evidence in any way.

a. Documents that limit inspection authority such as confidential disclosure forms, compliance with firm’s GMPs, a waiver to exempt the firm from liability should an accident occur and you are injured on the firm’s premises, letters concerning access to confidential information the firm does not want released, request for information/data you request during the inspection be put in writing, and any other forms cannot be signed.

b. Inspectors are allowed to sign in and out of the facility. However, read the document carefully to confirm the sign-in sheet does not contain any language that conflicts with this policy.

c. If a firm refuses inspection without a signature on one of the documents listed above, the investigator shall inform the firm that it will be considered a refusal of inspection and the department will initiate appropriate legal action.

d. If the firm so chooses, they may provide copies of the documents to the Minnesota Department of Agriculture (MDA) for review. The legal counsel for MDA will review the document and advise the Dairy and Food Inspection Division if an inspector may sign the document.

6.5.4 Protect the firm’s data in accordance with the Minnesota Data Practices Act. MN Statute 13.

a. Data is only available to those whose access is provided by law, department employee’s whose job reasonable requires access, or by court order.

b. When the Department of Agriculture determines no action is to be taken in an inspection or an investigation becomes inactive or closed, data collected will become public unless otherwise protected by law.

c. Refer to the Data Request/Protection SOP and MDA Data Practices Policy.

6.5.5 Individuals are not legally required to supply personal, private, or confidential data about themselves; however, such data may be subpoenaed.
An individual that supplies personal, private, or confidential information may reasonably expect the data to be used in enforcement actions.

6.5.6 Use suitable interviewing techniques.

   a. Actively engage in dialogue with the firm's owner(s) and employees.
   b. Be very specific when asking questions and requesting information from the firm.
   c. Use common language which is familiar to the firm.
   d. Note nonverbal communication such as: uneasiness, nervousness, preoccupation with other responsibilities, etc.
   e. Ask open-ended questions and ask follow-up questions to obtain the desired information.
   f. Reconcile any discrepancies in information provided by the firm.
   g. Be respectful of peoples' time during the inspection.

6.5.7 Explain findings clearly and adequately throughout the inspection.

   a. Inform the responsible person with you during the walk-through of the deficiencies at the time they are observed.
   b. Explain the public health significance associated with each deficiency.
   c. Verify the MRP understands of any deficiencies or observations. This could be done by requesting the MRP to repeat the deficiency or observation back to the inspector.
   d. Request any applicable documentation the firm may have in regards to the deficiency. The list of documents that may need to be obtained is stated in section 6.4.6.f. of this document.
   e. Clearly document deficiencies in the inspection notes for later use in the Inspection Report. The following information should be noted for each deficiency: who, what, where, when, and the amount in regards to food receipt, handling, processing, storage, and shipping.
   f. Verify the descriptions of the facility areas, pieces of equipment, processes used, etc. with the firm to help facilitate the understanding of the inspection report by the firm.
   g. Avoid giving specific recommendations for desired corrective actions. There may be many ways for the firm to comply and/or the recommendation may not achieve the desired compliance. It is appropriate to offer suitable solutions but it is the firm's responsibility to make the final decision as to the solution that will bring the firm into compliance.

6.5.8 Alert the firm’s MRP or other responsible individual during the walk-through when an immediate corrective action is required. Requiring correction on-site conveys the seriousness of the violation to the establishment. If operations are briefly stopped to address a food safety
issue, a more favorable impact on future behavior may result that might not have been achieved through discussion alone.

6.5.9 Answer questions and provide information in an appropriate manner.

a. Review the inspection report to the MRP and discuss any significant deficiencies observed.
b. Provide time and opportunity for questions or discussion from the firm related to orders issued, comments documented, etc.
c. Verify understanding of the orders, timeline, and possible appropriate actions to correct the violations.

6.5.10 Write findings accurately, clearly, and concisely on the Inspection Report and provide a copy of the document to the firm's MRP.

a. Refer to the Inspection Report Writing SOP.
b. For foods produced under 21 CFR, parts 113 (LACF), 114 (AF) and 123 (Seafood), complete the associated FDA forms. These forms are used as a checklist and not issued to the firm.
c. For FDA Contract Inspections, complete the FDA Contract Template Form. Send the Contract Template Form electronically to the appropriate supervisor.

6.6 Seafood HACCP Component

6.6.1 Inspectors leading Seafood HACCP inspections must attend and successfully complete the FDA Seafood HACCP Regulators Course (FD249).

6.6.2 Obtain and use the current issue of the Fish and Fishery Hazards and Control Guide. Be familiar with its organizational content in order to correctly identify and evaluate the hazards associated with the product and process.

6.6.3 Focus the inspection according to the highest risk activity being conducted on the day of inspection. Examples of high risk fishery products are listed below:

a. Refrigerated seafood products packed in Reduced Oxygen Packaging (ROP).
b. Cooking or pasteurization process including hot or cold smoking of fish or fishery products.
c. Scombrotxin-forming (histamine-forming) species
d. Stuffed seafood products
e. Raw and cooked ready-to-eat products
f. Aquacultured seafood (primary processor)
g. Seafood mixes - Combination of seafood products including all raw, all cooked, or a mixture of raw and cooked product

6.6.4 Records may be requested in the beginning of the inspection to allow the firm adequate time to retrieve the information. This information can be reviewed later in the inspection.

6.6.5 Determine the firm’s seafood related operations and sanitation procedures during the walk-through and develop a flow chart.

6.6.6 Conduct a Hazard Analysis during the walk through. This information can be compared to the HACCP plan after the inspection to verify any inconsistencies in the firm’s defined hazards and the inspector’s observations.

6.6.7 Once the walk through has been completed, review the firm’s HACCP plan. Verify the required components are present and confirm the hazards found in the walk through are addressed.
   a. Determine if the HACCP plan is being implemented or if the firm has the controls in place in the absence of a plan.
   b. Review the HACCP records including but not limited to: sanitation monitoring records, CCP monitoring records and documentation of corrective actions.

6.6.8 Assess the firm’s monitoring of the eight key areas of sanitation listed in seafood regulation 21 CFR, part 123.
   a. Firms may not be required to monitor all of the key sanitation areas. The inspector should determine the relevant elements and adjust the inspection accordingly.

6.6.9 Complete the FDA 3501 Inspection Form.

6.7 Juice HACCP Component

6.7.1 Inspectors leading Juice HACCP inspections must attend and successfully complete Juice HACCP and Conducting Juice Inspections Course (FD219).

6.7.2 Obtain and use the current version of the Guidance for Industry: Juice HACCP Hazards and Controls Guidance as well as the course manual and be familiar with the organizational content of both in order to correctly identify and evaluate the hazards associated with the product and process.
6.7.3 Request the records needed in the beginning of the inspection to allow the firm adequate time to retrieve the information. This information can be reviewed later in the inspection.

6.7.4 Determine the firm’s manufacturing operations and sanitation procedures by conducting a walk-through and developing a flow chart.

6.7.5 Conduct a Hazard Analysis of the firm while on the walk through. This information can be compared to the HACCP plan after the inspection to verify any inconsistencies in the firm’s defined hazards and the inspector’s observations.

6.7.6 Once the walk through has been completed, review the firm’s HACCP plan. Verify the required components are present and confirm the hazards found in the walk through are addressed:

   a. Determine if the HACCP plan is being implemented or if the firm’s has the controls in place in the absence of a plan.
   b. Review the HACCP records including but not limited to: sanitation monitoring records and documentation of violations.
   c. Assess the firm’s monitoring of the eight key GMP areas of sanitation listed in the Juice HACCP regulation 21 CFR part 120.
   d. Firms may not be required to monitor all of the key GMP areas. The inspector should determine the relevant elements and adjust the inspection accordingly.

6.8 Acidified Foods Inspections

6.8.1 Inspectors leading Acidified Foods inspections must attend and successfully complete Conducting Acidified Foods Inspections Course (FD202).

6.8.2 Refer to MDA’s current Acidified Foods Inspection Program Guidance.

6.8.3 Request the records needed in the beginning of the inspection to allow the firm adequate time to retrieve the information. This information can be reviewed later in the inspection.

6.8.4 Complete Form FDA 3511-2 “FDA Acidified Food Inspection Report” for each inspection conducted and submit with the inspection report.

6.9 Low Acid Canned Foods (LACF) Inspections

6.9.1 Inspectors leading Low Acid Canned Foods inspections must attend and successfully complete Conducting Low Acid Canned Food Inspections (FD 203).
6.9.2 Refer to MDA’s current LACF Inspection Program Guidance and the current year Canning Program Work Plan.

6.9.3 Request the records needed in the beginning of the inspection to allow the firm adequate time to retrieve the information. This information can be reviewed later in the inspection.

6.9.4 Complete FDA Form 3511 “FDA LACF Inspection Report” for each inspection conducted and submit with the inspection report.

6 RELATED DOCUMENTS (includes References, Attachments):

Allergen Guidance Document  
Acidified Foods Guidance Document  
Bioterrorism Records Document  
Canning Inspection Program Guidance  
Current Year Canning Program Work Plan  
Digital Media SOP  
Food Inspection Supplies, Forms, Equipment Check List  
GMP Checklist  
Inspection forms (blank, retail comments and retail checklist), inspection memos  
Inspection Report Writing SOP  
Manufacturer and Distributor Risk SOP  
Notice of Inspection SOP  
Documents/Records Guidance  
Sampling Guidance

7 EQUIPMENT/MATERIALS NEEDED

Inspection equipment listing (training materials or evaluation listing)

8 SAFETY

All MDA employees must follow the personal protective equipment requirements and field safety guidelines outlined in the initial and annual Food Inspector safety training. Never enter an area or perform any job task that you think will result in injury or illness. If you do identify any unsafe conditions – STOP the inspection immediately and consult with the facility management or your supervisor regarding a corrective action for the hazard(s). Lastly, stick to the specific focus of your position and as always – THINK SAFETY!

Food inspection staff must follow the Verbal and Physical Assault of State Agriculture Inspectors Policy. If the firm’s operators have a history of hostile behavior, speak with your supervisor before conducting inspection.

Before performing an inspection, ask firm about any physical or chemical safety issues in the firm. If the inspector has concerns about in-facility safety, please contact supervisor.
9 CIRCULATION

This document is circulated to the following: food inspection staff, food inspection supervisors, compliance officers, compliance supervisor, food program manager, compliance program manager, support staff, data management unit supervisor and the division director.

10 APPROVAL/DOCUMENT HISTORY

<table>
<thead>
<tr>
<th>Version #</th>
<th>Status (I, R)</th>
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<tr>
<td>1</td>
<td>I</td>
<td>Initial Policy Drafting.</td>
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Approved By: ___________________________ Date: ___________________________

Approved By: ___________________________ Date: ___________________________

I = Initial document; R = Revised document