Minnesota Department of Agriculture
Food and Feed Safety Division

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Title: **Standardization of Retail Inspection Staff**	

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1. PURPOSE

This procedure describes the process used by the Minnesota Department of Agriculture (MDA) Food and Feed Safety Division (FFSD) to standardize inspection staff within the Retail Food Program and within the agencies that are under the current delegation agreement. Standardization of inspection staff is conducted to promote uniformity of regulatory food inspections throughout the State of Minnesota.

2. SCOPE

This procedure describes the process to be used in evaluating the standardization candidates' understanding and application of the Minnesota Food Code provisions during inspections of retail food establishments. This procedure applies to the standardization of MDA inspection staff by MDA Standards, as well as joint standardization of delegated agency staff performed by MDA and the Minnesota Department of Health (MDH). MDA and MDH will coordinate the division of inspections and required performance criteria (HACCP plan review, Risk Control Plan, and Process Flows) during joint standardization of delegated agency staff.

3. BACKGROUND

Standard 2 of the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS) requires that staff conducting inspections within the Retail Food Program satisfactorily complete four joint inspections with a "training standard" within 18 months of employment or assignment to the program. The application of the standardization procedure will ensure that the candidate recognizes foodborne illness risk factors and interventions and good retail practices. The procedure will confirm that the candidate can achieve practical and immediate correction of Out of Compliance foodborne illness risk factors during the inspection, can effectively communicate with the establishment's staff, can understand and apply Hazard Analysis Critical Control Point (HACCP) principles, and use necessary inspection equipment during a risk-based inspection. MDA will use a scoring structure based on four (4) inspections for initial standardization. The reduction from eight (8) initial standardization (FDA) inspections to four (MDA) would apply only to state and local field staff that are <u>not</u> responsible for Standardizing any other staff personnel. In keeping the "per establishment" disagreement number and the percentage for the

overall average criteria (from all inspections combined) the same as the FDA criteria for 8 inspections, the total number of disagreements allowed over four inspections is cut in half.

4. RESPONSIBILITY

Retail Food Program Manager – The Retail Food Program Manager will provide guidance during the termination of a standardization exercise.

Training Coordinator (TC)/Training and Standards Administrator (TSA) – The Training Coordinator/Training and Standards Administrator will establish due dates for a candidate's initial standardization and re-standardization based upon hire date; enter inspection facility and date information into SharePoint; and issue the final certificate of completion and letter to the candidate.

Food Inspector/Candidate – The Food Inspector/Candidate will propose facilities and dates for standardization inspections to the Standard; conduct a pre-standardization inspection as needed; conduct standardization inspections; complete all applicable reports and supporting documentation for each inspection; schedule follow-up meetings with the Standard to review inspection reports and documents; and upload completed documentation to SharePoint.

FDA SFSIO/SFSIO (Standard) – The Standard will determine the eligibility of the candidate; review facilities and inspection dates proposed by the Candidate; send a confirmation email to the Candidate outlining facilities and inspection dates; complete applicable reports; review reports and supporting documents with the Candidate; score the Candidate's reports and supporting documents for each inspection and determine if the performance criteria were met; terminate a standardization exercise as needed; and sign the letter and certificate of completion at the end of the standardization exercise.

5. DEFINITIONS

Candidate - A candidate is the person whose performance is being evaluated during the standardization process. This person may be: an individual who has successfully completed the eligibility requirements for initial standardization; a standardized individual who has maintained the requirements for restandardization.

Certificate – A certificate is the official document issued to an individual that has successfully completed the standardization process.

Complex food preparation – Complex food preparation is a process wherein multiple steps are involved in the preparation of a food item, i.e., food is stored, prepared, cooked, cooled, reheated, hot held, and served.

Critical Control Point (CCP) – A critical control point is a point or procedure in a specific food system where loss of control may result in an unacceptable health risk.

Critical Limit (CL) – A critical limit is the maximum or minimum value to which a physical, biological, or chemical parameter must be controlled to minimize the risk that the identified food safety hazard may occur.

Disagreement – A disagreement is an instance when a candidate incorrectly marks the IN/OUT/NA/NO status of an item on the inspection report. A disagreement may also occur when a candidate fails to make an observation.

FDA Standardized Food Safety Inspection Officer (FDA SFSIO) – A FDA SFSIO is a representative of the Minnesota Department of Agriculture (MDA) who has been standardized and certified by the FDA as having satisfactorily demonstrated competence to interpret and apply the provisions of the FDA Food Code. These individuals may standardize MDA supervisors or inspectors and senior staff from delegated agencies.

Foodborne Illness Risk Factors – Foodborne illness risk factors are practices or procedures which are most frequently identified by epidemiologic investigation as a cause of foodborne illness or injury, specifically: improper holding temperatures; inadequate cooking; contaminated equipment; unsafe or unapproved source; and poor personal hygiene.

Good Retail Practices (GRP) – Good retail practices are preventive measures that include practices and procedures which effectively control the introduction of pathogens, chemicals, and physical objects into food. Good Retail Practices are prerequisites to instituting a HACCP Plan or Risk Control Plan.

Interventions - An intervention is a preventive measure identified in the FDA Food Code to protect consumer health. The interventions are: management's demonstration of knowledge; employee health controls; controlling hands as a vehicle of contamination; time -temperature parameters for controlling pathogens; and consumer advisory.

Hazard Analysis Critical Control Point (HACCP) Plan: "HACCP plan" means a written document that delineates the formal procedures for following the hazard analysis critical control point principles developed by the National Advisory Committee on Microbiological Criteria for Foods.

HACCP Principles – HACCP Principles are the 7 principles of the Hazard Analysis and Critical Control Point System which are the following: conduct a hazard analysis; identify the CCPs in the process; establish critical limits for preventive measures associated with each identified CCP; establish CCP monitoring requirements; establish corrective action to be taken when monitoring indicates that there is a deviation from the established critical limit; establish procedures for verification that the HACCP system is working correctly; and establish effective recordkeeping procedures that document the HACCP system.

Regulatory Authority – Regulatory authority means MDA or the delegated agency having jurisdiction over food establishments.

Risk-based inspection – A risk-based inspection is a food establishment inspection approach that utilizes the technical skills and attributes related to foodborne illness risk factors and interventions, good retail practices, application of HACCP, inspection equipment, and communications as specified, with particular emphasis on interventions and foodborne illness risk factors.

Risk Control Plan – A risk control plan is a mutually agreed upon written plan (between the candidate and the management of the food establishment) that describes a management system for control of foodborne disease risk factors. The plan delineates necessary records, responsible personnel, what needs to be controlled, and how it will be controlled.

Standard – A standard is an individual (FDA SFSIO or SFSIO) who is conducting the evaluation portion of the standardization exercise.

Standardization – Standardization is the process whereby a candidate demonstrates the knowledge and skills to satisfy requirements of the standardization exercise as outlined in this procedure.

Standardized Food Safety Inspector (SFSI) – A standardized food safety inspector is an individual who has been standardized by SFSIO. These individuals are not authorized to standardize others.

Standardized Food Safety Inspection Officer (SFSIO) - A standardized food safety inspection officer is a MDA retail inspection staff member who has been standardized and certified by the FDA Standardized Food Safety Inspection Officer (FDA SFSIO). These individuals are responsible for standardizing their staff or others within their own agency. SFSIO are not authorized to standardize individuals from other agencies.

Swing (S) – A swing is used in scoring the inspection report to describe a disagreement when a candidate fails to make an observation, but had an opportunity to do so.

6. PROCEDURES

6.1 Determine Eligibility of the Candidate

FDA SFSIO/SFSIO (Standard)

6.1.1. Determine eligibility of candidate (SFSI) for initial standardization based on the following criteria:

a. Be routinely engaged in food protection program work; and

b. Have successfully completed the required Food Safety Training (including pre- and post-inspection curriculum); and

c. Have successfully completed 25 Independent Field Inspections (or a reduced number of inspections, based on previous experience and demonstrated competencies, that have been approved by the Supervisor, Training Coordinator, and Retail Food Program Manager).

d. For delegated agency inspection staff, an application will be completed for the proposed candidate and submitted to MDA and MDH for approval to determine eligibility.

6.1.2. Determine eligibility of candidate for becoming a SFSIO based on the following criteria:

a. Meets criteria outlined in 6.1.1; and

b. Have job responsibility for conducting food safety training and/or standardization of other regulatory personnel; and

c. Be a Registered Environmental Health Specialist in the state of Minnesota; and

d. Successful completion of initial standardization by MDA or MDH.

d. For delegated agency inspection staff, an application will be completed for the proposed candidate and submitted to MDA and MDH for approval to determine eligibility.

Training Coordinator (TC)

6.1.3. Establish due dates for candidate's initial standardization and re-standardization based upon hire date and include in the candidate's training plan.

a. The due date for initial standardization shall be within 18 months of the hire date.

b. The due date for re-standardization shall be within 3 years after initial standardization is completed.

6.1.4. Verify the eligibility of the candidate for standardization based upon completion of the required Food Safety Training.

6.2 Select Establishments for Inspections

Candidate

6.2.1 Refer to Table 1 for the number of inspections to be completed and the timeframe based upon the type of certification (for FDA SFSIO Standardization, refer to the current version of *FDA Procedures for Standardization of Retail Food Safety Inspection Officers*):

Table 1: Summary of Number of Inspections and Timeframe

	Inspector		**SFSIO**	
	Number of Inspections	**Timeline**	**Number of Inspections**	**Timeline**
Initial	4	Within 18 months of employment – to be completed within a period of one month, not to exceed three months.	8	Within a period of one month, not to exceed three months.
Re-standardization[1]	4	Every 3 years after initial standardization.	6	Every 3 years after initial standardization.

[1] Inspections for re-standardization may begin after a 1 (one) year waiting period from initial standardization. Inspections may be spaced throughout the following 2 (two) year period to continually assess risk-based inspection work.

6.2.2 Select food establishments to be used for standardization inspections using Table 2 for guidance:

Table 2: Summary of Inspection Options

Inspection Type/Options	Comments/ Notes	Required/ Optional	Inspector	SFSIO
Complex Deli or Restaurant (Chain or Independent Grocery Store)	Complex preparation including cooking, cooling, and reheating for hot holding involves many TCS foods. Variety of processes require hot and cold holding of TCS food.	At least 1 required	At least 1 inspection but up to 2 inspections - preferred one chain and one independent during both initial and re-certification	Up to 5 – independent or chain grocery stores for both initial and re-certification with at least 1 being an independent store
Meat & Seafood Facility/Department	Should serve both raw and ready to eat foods preferably include shellstock	At least 1 required	At least 1 inspection during both initial and re-certification	Up to 3 inspections during both initial and re-certification at least 1 should have shellstock
HACCP Establishment	Sushi rice, smoking/curing, Shellstock tank or ROP	At least 1 required	At least 1 inspection during both initial and re-certification	At least 1 inspection during both initial and re-certification
High-Risk Complex Convenience Store	Most products are prepared/cooked and served immediately. May involve hot and cold holding of TCS foods after preparation or cooking. Complex preparation of TCS foods requiring cooking, cooling, and reheating for hot holding is limited to only a few TCS foods.	Optional (this type of facility may be used when limited inspection types (deli, grocery stores, etc.) are available)	Up to 1 inspection during both initial and re-certification	Up to 1 inspection during both initial and re-certification

6.2.3 Email list of selected food establishments to the Standard, along with proposed inspection dates, for approval prior to notifying the Training Coordinator.

6.2.4 Email the Training Coordinator the list of establishments and inspection dates once determined.

TC/Training and Standards Administrator

6.2.5 Enter inspection dates and establishment information into the SharePoint form.

FDA SFSIO/SFSIO (Standard)

6.2.6 Upon receiving the SharePoint notifications of food establishments and inspection dates, send an email to the Candidate using the *Standardization Email Template* to confirm scheduling of the standardization inspections.

6.3 Conduct Inspections

Candidate

6.3.1 Conduct, as needed, a "pre-standardization" inspection with an inspector who has recently been standardized prior to conducting the first inspection with the assigned Standard. This inspector shall be chosen in consultation with the candidate's supervisor. The "pre-standardization" inspection is as a way for the candidate to become familiar with the standardization inspection process and the applicable documents.

Candidate and FDA SFSIO/SFSIO (Standard)

6.3.2 Conduct the standardization inspections as outlined in the *Appendix 20.06 - Conducting Standardization Inspections* and within the timeframes noted in Table 1.

6.3.3 Determine if the inspection will be regulatory or non-regulatory prior to the inspection. This determination will be at the discretion of the candidate and standard, but the following can be considered when making this determination:

a. For non-regulatory inspections:

i. the facility is not due for a routine inspection,

ii. facility size inhibits completion of a regulatory inspection within the timeframe,

iii. discussion between the candidate and standard reveals that the inspection will be non-regulatory

b. For regulatory inspections:

i. the facility is due for a routine inspection,

ii. facility size allows for a full regulatory inspection within the timeframe,

iii. discussion between the candidate and standard reveals that the inspection will be regulatory (for candidates being restandardized, regulatory inspections can count towards the retail field audit requirement found in Standard 4 of the VNRFRPS as long as the standard is not the candidate's direct supervisor)

6.4 Complete Inspection Report

Candidate

6.4.1 Complete the *Minnesota Standardization Inspection Report* prior to the next inspection, based on observations and data collected during the inspection, unless conducting a second inspection the same day. The candidate must record the status of all items on the report form, rather than addressing only those items in violation at the time of the inspection. Items must be marked as either in compliance (IN), out of compliance (OUT), not observed (NO), or not applicable (NA). The correct Minnesota Rule must be cited for all items out of compliance.

FDA SFSIO/SFSIO (Standard)

6.4.2 Complete the *Minnesota Standardization Inspection Report* prior to the next inspection, unless conducting a second inspection on the same day.

6.5 Compare Findings

Candidate

6.5.1 Schedule follow-up meeting with the training standard to compare inspection reports within 2 (two) business days of the inspection. The follow-up meeting will take place prior to the next inspection.

FDA SFSIO/SFSIO (Standard)

6.5.2 Discuss and review the candidate and standard's interpretations and marking of the inspection report during the follow-up meeting. Also review flow charts, *HACCP Worksheet and Verification Form*, and risk control plan as applicable to the inspection.

6.6 Score Inspection Documents

FDA SFSIO/SFSIO (Standard)

6.6.1 Score the candidate's inspection report and other applicable documents at the conclusion of the follow-up meeting. For joint standardization of delegated agencies, schedule a meeting with the MDH Standard to coordinate the scoring of the candidate. Use Table 3 to determine performance:

Table 3: Performance Area Standards for Standardization

Performance Area	Level of Agreement
Risk-Based Inspections	**Initial Standardization** ▪ Minimum of 80% or no more than 10 disagreements out of a total of 51 items in any one establishment. ▪ In a minimum of four (4) completed inspections for inspector standardization or eight (8) completed inspections for standard standardization, an average score of 90%. **Restandardization:** Same criteria for a minimum of four (4) inspections for inspector standardization and six (6) for a training standard.
Good Retail Practices	**Initial Standardization:** ▪ Minimum of 80% or no more than five (5) disagreements out of a total of 28 items in any one (1) establishment. ▪ In a minimum of four (4) completed inspections for inspector standardization or eight (8) completed inspections for standard standardization, an average score of 85%. **Restandardization:** Same criteria for a minimum of four (4) inspections for inspector standardization and six (6) for a training standard.
Application of HACCP Principles	**Three (3) Process Flow Charts:** ▪ Maximum of two (2) errors or omissions ▪ Rated "satisfactory" or "needs improvement."

	One HACCP Plan Verification: • HACCP Worksheet and Verification form need to be completed ▪ Agreement on at least eight (8) out of the nine (9) answers on Chart #2 of the *FDA Field Manual*(ANNEX 4, Section 2) ▪ Rated "satisfactory" or "needs improvement." **One Risk Control Plan** ▪ Accurately list seven elements of a risk control plan ▪ Rated "satisfactory" or "needs improvement."
Inspection Equipment	▪ Candidate has equipment from the *essential* equipment list ▪ Candidate demonstrates knowledge and use of *essential* equipment Rated "satisfactory" or "needs improvement."
Communications	Observations of : ▪ Introductions to Person-In-Charge ▪ Fact finding questions through interview with Person-In-Charge ▪ Candidate setting an example ▪ Exit conference with Person-In-Charge. Rated "satisfactory" or "needs improvement."

6.6.2 Determine if candidate will continue the standardization process based on the score/outcome of the each inspection.

6.6.3 Retain copies of the inspection reports and related documents (Risk Control Plan, Process Flow Charts, and HACCP Worksheets) for each standardization inspection.

6.6.4 Determine overall performance of the candidate at the conclusion of all standardization inspections using criteria outlined in Table 3.

6.7 Document Control

Candidate

6.7.1 Upload the completed *Minnesota Standardization Inspection Reports* and all applicable documents from the inspection (Risk Control Plan, Process Flow Charts, HACCP Worksheets) to the SharePoint form related to the inspection after the follow-up meeting is complete.

FDA SFSIO/SFSIO (Standard)

6.7.2 For joint standardization of delegated agency staff, the standard will obtain copies of the inspection reports and applicable documents from the candidate and upload to SharePoint.

Training Coordinator

6.7.3 Obtain the documentation related to each standardization inspection from the SharePoint form and save to the standardization SharePoint site.

6.8 Termination of Field Exercise

FDA SFSIO/SFSIO (Standard)

6.8.1 The standard may terminate the standardization exercise at any point during the initial or re-standardization inspections because of the candidate's inability to meet (or the likelihood of not meeting) the performance criteria. The standard will review the reasons for termination with the candidate, the candidate's supervisor, and the Retail Food Program Manager. The standard will document the results of the field exercise, with the reasons for termination exercise, following termination of the standardization procedure and email to the Training Coordinator, Candidate's supervisor (if not the standard), and the Retail Food Program Manager.

Training Coordinator

6.8.2 Save the termination notice and applicable documentation to the standardization SharePoint site.

6.9 Issue Certificate

FDA SFSIO/SFSIO (Standard)

6.9.1 Determine if the candidate has successfully completed the standardization process based on the average score achieved during the standardization inspections as outlined in Table 3.

6.9.2 Create and sign the certificate of completion and email to the Training Coordinator. If the certificate is for a delegated agency staff member, obtain the signature of the MDH Standard who conducted the joint standardization prior to emailing to the Training Coordinator.

Training Coordinator

6.9.3 Issue the final certificate of completion and letter to the candidate and the Standard within 2 weeks of receiving the required documentation.

6.9.4 Save the certificate of completion to the Learning Management System.

7. RELATED DOCUMENTS (includes References, Attachments)

Appendix 20.06 – Conducting Standardization Inspections
Code Reference Sheet
Complex Food Preparation Flow Chart
Cook Serve Food Preparation Flow Chart
FDA Procedures for Standardization of Retail Food Safety Inspection Officers
Food Code Standardization Score Form
HACCP Plan Verification Summary
HACCP Plan Verification Worksheet
Joint Certificate for Delegated Agency Standardized Food Inspection MDH-MDA
Joint Completion Letter for Delegated Agency Standardized Food Inspection MDH-MDA
MDA Standardization Certificate of Completion
MDA Standardization Completion Letter
MDH-MDA Delegated Agency Standardization Agreement
MDH-MDA Standardization Application Form
Minnesota Standardization Inspection Report

MN Marking Instructions
Prep Serve Food Preparation Flow Chart
Risk Control Plan
Standardization Email Template
Temperature Recording Table

8. EQUIPMENT/MATERIALS NEEDED

See Appendix 6.0 – Conducting Standardization Inspections for list of equipment needed.

9. 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. 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, contact supervisor. 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 also 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.

10. CIRCULATION

This document is circulated to the following: Retail Food Inspection staff, Retail Food Inspection Supervisors, Training Coordinator, Training and Standards Administrator, Division Director, and the Retail Food Program Manager. A standing version of this procedure is located in the Food Program SOP Library.

11. APPROVAL/DOCUMENT HISTORY

Document History		
Version #	**Status (I, R)**	**Change History**
1	**I**	**Initial Policy Drafting.**

Jeff Luedeman Digitally signed by jeff.luedeman@state.mn.us Date: 2016.07.01 14:31:09 -05'00'	07/01/2016
Approved By:	**Date**
Approved By:	**Date**

I = Initial document; R = Revised document