

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

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Version #: 1	Effective Date: 08/26/2016
Title: Retail Establishment File Audit SOP	

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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) for the periodic review of Retail Establishment Inspection files. The audit is conducted to verify that appropriate field compliance actions are taken correctly when out-of-control risk factors or code interventions are recorded during routine inspections.

**2. SCOPE**

This procedure applies to the audit of retail food inspection files to ensure compliance with FFSD field inspection, report writing, and field compliance procedures. The audit may pertain to inspection reports completed for routine inspections, reinspections or follow-up inspections for retail food facilities inspected under MDA authority. This procedure does not apply to manufactured or wholesale food inspection reports. Refer to *FOOD.60.12 – Enforcement Case Audit SOP* for the audit of enforcement procedures.

**3. BACKGROUND**

Standard 6 of the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS) requires that compliance and enforcement activities result in follow-up actions for out-of-control risk factors and timely correction of code violations. Proper use, completion, and submission of inspection reports are key components in assuring those purposes are adequately and consistently being met in the Retail Food Program. Auditing establishment files can help to identify where deficiencies exist within the current system as well assist in the initiation of corrective actions which are necessary when deficiencies are identified.

**4. RESPONSIBILITY**

**Business and Quality Management Unit Supervisor** – The Business and Quality Management Supervisor will assist with auditing and provide oversight as necessary.

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**Retail Food Program Manager** – The Retail Food Program Manager will assist in determining corrective actions when program-related deficiencies are noted.

**Electronic Systems Coordinator** – The Electronic Systems Coordinator will produce the list of active high- and medium-risk retail facilities in USA Food Safety (USAFS); export the list to Microsoft Excel; and run a random number generator to produce a randomly chosen list of facilities to be audited.

**Compliance Supervisor** - The Compliance Supervisor will assist in determining corrective actions when program-related deficiencies are noted.

**Food Inspection Supervisor** - The Supervisor will assist the Retail Food Program Manager in determining corrective actions when deficiencies are noted.

**Qualified Establishment File Auditor (Auditor)/Food Standards Coordinator** – The Auditor will review the list of randomly selected establishment files; gather files for review; determine if the files qualify for auditing; audit files; and record findings on the *Establishment File Worksheet* and the *Appendix 6.0-Performance Factor Rating for Establishment File Audit*.

## 5. DEFINITIONS

**Enforcement Activities:** Enforcement activities are informal or formal actions taken to achieve compliance with regulations outside of an inspection. These actions include, but are not limited to, Letters of Information, Warning Letters, Administrative Meetings, issuance of penalties, or other court actions.

**Field Compliance Activities:** Field compliance activities are actions performed during an inspection to achieve compliance with regulations. These actions include, but are not limited to, correction on site, reinspections, embargo, and sanitary notice.

**Qualified Establishment File Auditor (Auditor):** A qualified establishment file auditor is someone who has completed the most current training on the following SOPs:

- a) FOOD.30.02 – Reinspection SOP
- b) FOOD.30.05 - Inspection Report Writing SOP
- c) FOOD.30.20 – Inspection Protocol-Retail Food SOP
- d) FOOD.30.27 – Field Compliance Actions SOP
- e) FOOD.60.10 – Enforcement Trigger and Initial Assessment SOP

**“Start Point” Inspection:** A “start-point” inspection is the third oldest routine inspection in the establishment’s file at the time of review. The “start-point” inspection must show a violation of the risk factor or public health interventions. If no risk factor or public health intervention violations are noted in the third oldest routine inspection, the fourth oldest report may be used.

## 6. PROCEDURES

### 6.1. Select Retail Establishment Files for Review

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Electronic Systems Coordinator

- 6.1.1.** Generate list of active and on-hold high- and medium-risk retail facilities that have been in business for at least 5 years in USA Food Safety (USAFS) and export to Microsoft Excel.
- 6.1.2.** Assign a number to each facility (ranging from 1 to the last facility listed) in the Excel spreadsheet.
- 6.1.3.** Use the RANDBETWEEN function in Excel and generate random numbers within the range used in 6.1.2.
- 6.1.4.** Use Microsoft Access to pull out the first 200 facilities based on the random numbers generated in 6.1.3.
- 6.1.5.** Compile the list of 200 randomly selected facilities and email to the Food Standards Coordinator.

Food Standards Coordinator/Auditor

- 6.1.6.** Request a list of active and on-hold high- and medium-risk retail facilities that have been in business for at least 5 years in USA Food Safety (USAFS) from the Electronic Systems Coordinator at least once every 60 months.
  - 6.1.7.** Save list of randomly selected facilities with the name *Retail Establishment Files (Year)* to the VNRFPS SharePoint site. Enter the year for which the list was pulled in the naming convention.
  - 6.1.8.** Review list of facilities and gather copies of inspection reports from the establishment files from USAFS or from the paper file for the first 70 facilities on the list.
  - 6.1.9.** Determine if the first 70 files qualify for review based on the following:
    - a. At least 3 routine inspections have occurred at the facility; and
    - b. A risk factor or public health intervention order is documented on the “start-point” inspection.
    - c. If the file does not meet these criteria, it does not qualify for an audit. Document on the *Retail Establishment File (Year)* list if the file “Does Not Qualify”.
  - 6.1.10.** Continue the process of determining if files qualify for auditing until 70 qualified files are obtained.
- 6.2. Complete the *Establishment File Worksheet* – Food Standards Coordinator/Auditor**



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**6.4.2.** Enter comments into the *Appendix 6.0 – Performance Rating for Establishment File Audit* regarding improvements needed to follow procedures at the close of the meeting.

**6.5. Documentation – Food Standards Coordinator Role**

**6.5.1.** Retain all Worksheets and documentation related to the establishment file audits and corrective actions in an electronic file.

**7. RELATED DOCUMENTS (includes References, Attachments)**

FOOD.30.05 - Inspection Report Writing  
FOOD.30.02 – Reinspection SOP  
FOOD.30.20 – Inspection Protocol-Retail Food SOP  
FOOD.30.27 – Field Compliance Actions SOP  
FOOD.60.10 – Enforcement Trigger and Initial Assessment SOP  
USAFS Guides

**8. EQUIPMENT/MATERIALS NEEDED**

N/A

**9. SAFETY**

N/A

**10. CIRCULATION**

This policy will be circulated to the following individuals: the Retail Food Program Manager, Retail Food Program Supervisors, Compliance Supervisor, Compliance Officers, Business and Quality Management Unit Supervisor, and the Food Standards Coordinator. A standing version will be stored electronically on the FFSD server.

**11. APPROVAL/DOCUMENT HISTORY**

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