MPR 1
Plan Review

Materials necessary for auditing the MPR

- Plan review log book or tracking system
- Facility files selected for the review
- Department's program policy manual

Sample Selection:

- Use "Annex 6 - Office Sample Size Chart" to determine the number of records for review. The maximum sample size is ten.
- Follow "Annex 5 - Approved Random Sampling Methods" guide to select the sample.
- Using the logbook, randomly select the records for review for establishments that have been constructed, altered, converted, or remodeled since the last review cycle. If possible, do not select facilities that were reviewed using the April 28, 2003 memo for pre-existing food service establishments. Limit the sample to only those establishments for which the plans review process has been fully completed.

Program Indicators:

- Does the department review complete sets of plans and specifications?
  a. Application form/transmittal letter
  b. Completed worksheet
  c. Menu
  d. Standard Operating Procedures (SOP)*
  e. Layout (plans), including scaled drawings**
  f. Equipment specifications or equivalent information such as make and model number.
  g. A copy of the pre-opening evaluation report is in the file.
  h. The evaluation report has a notation to indicate the establishment is approved to operate.
  i. The evaluation report verifies that there were no Priority or Priority Foundation violations present prior to opening

*Acceptable SOP Documentation:
1. A notation on the plan review checklist to indicate either:
   - SOPs have been submitted in compliance with the requirements of the Food Code; or
   - SOPs are not required (construction does not affect operation – i.e. new walk-in cooler). OR
2. When SOPs are reviewed just prior to opening, notations on the pre-opening EVALUATION report to indicate that SOPs have been submitted in compliance with the requirements of the Food Code have been established. OR
3. Use of the "SOP Cover Sheet" which was designed to document SOP review.

Actual SOP documents do not have to be maintained in the plan review file, since they may consist of CDs, videos, etc., or an office may maintain a copy of a chain's SOPs in a central file.

**Scaled drawings mean either:
1. Drawings that are proportional between two sets of dimensions (i.e. 1/4 inch of the drawing = 1 foot of the actual object); or
2. All objects on the drawing are proportional in size to each other. Dimensions are included.
   - Is the plan review process properly documented?
     a. Use of a plan review checklist.

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b. Calculations to show what is needed and what is proposed for hot water, dry storage, and refrigerated storage for all establishments, including documentation of approval for less than the required calculations, engineering documentation, or other justification for approval.

c. Applicant is informed in writing of any deficiencies. All identified deficiencies are addressed in writing, email or a documented phone call or on revised plans.

d. Plan approval letter is in the file that includes a description of the scope of the project, and references a unique identifier (I.E.: date) marked on the approved plans and specifications. See MDARD "Model Plan Review Approval" letter for an example.

An establishment file will be considered to meet the standard when 80% of the program indicators reviewed are met. The evaluation may be terminated when 40% of the files selected for review indicate the MPR is "Not Met."

How to judge compliance with MPR 1

- **Met** – 80% of the establishment files evaluated indicate that the department reviews complete sets of plans and properly documents the plan review process.
- **Not Met** – Overall, the plan review process does not assure complete sets of plans and the plan review process are poorly documented (give specific examples and percentages).

Tips for passing MPR 1

- If plan review training is necessary, contact your Michigan Department of Agriculture and rural Development (MDARD) Plan Review Specialist. Use MDARD's plan review manual, checklist, calculators, and other plan review form letters and materials.
- Organize the records to be audited. Arrange the files in chronological order. Fasten the material together so that it cannot fall out of the file and become disorganized. Discard materials that were either not required to be submitted or used during the review.
- Review the MDARD's "Sanitarian Training Module on Plan Review."
- Conduct quality control evaluations of selected completed plan reviews.

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MPR 2

Evaluation Frequency

Materials necessary for auditing the MPR

- MDARD print-out of licensed establishments
- Local health department files
- Local health department database (optional)

Sample Selection

- This sample of fixed food service establishments is used to evaluate MPRs 2, 4, 5, 6, 7, and 8.
- Use "Annex 6 - Office Sample Size Chart" to determine the number of establishments for review.
- Follow "Annex 5 - Approved Random Sampling Methods" guide to select the sample from the MDARD licensing print out.
- Where there are multiple offices, a proportional sample should be selected to reflect the percentage of establishments regulated by each individual office (i.e. 35% of the establishments are located in County A and 65% are in County B).
- From the sample selected, pick a subset of establishments for field review that meet the criteria for MPR 2.
- If possible, make certain the sample includes at least one (1) mobile food service establishment, one (1) Special Transitory Food Unit, and one (1) Vending file.
- Obtain the folder for each of the establishments in the sample.

Program Indicators

- Discussion: Not all of the establishments in the sample require the same number of evaluations. Variations may be due to the fact that some establishments may have either opened or closed during the three year review period. Some may be seasonal operations. Some may have been evaluated shortly before the review period thus pushing the first evaluation 6 months back into the review period. Some may be using the Risked Based Evaluation Schedule (see MDARD memo dated November 13, 2008.) The evaluation must take these factors into consideration.
- Evaluation Method (Example for facilities using a 6-month evaluation schedule.): Determine the number of evaluations that were required and actually conducted during the three year review period. Start with the first evaluation in the review period.
- Examples:
  a. Regular fixed: Count forward from the first evaluation in the review period in six-month intervals. At each interval, determine if an evaluation has been made. Allow one extra month grace period. Determine the percentage of evaluations that were made at the required intervals for each folder.

     Example folder for Bill's Burgers
     Accreditation period: February 10, 2003 – February 10, 2006
     First Evaluation :   April 20, 2003
     Next routine: November 15, 2003 (ok < 7 months)
     Next routine: May 10, 2004
     Next routine   Missed – no evaluations
     Next routine: April 30, 2005
     Next routine: November 13, 2005 (ok, < 7 months from last evaluation)
     Number of required Evaluations = 6
     Number of evaluations conducted at proper frequency = 5

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Percentage of evaluations: = 83%

    b.   <u>Seasonal fixed and low risk establishments:</u> Determine if one evaluation was made during each operating season in the review period. (NOTE- Seasonal establishments have no set inspection schedule, and can be done any time throughout the operating season. If an RBE Schedule is used, the facility must be inspected on the established routine schedule. A seasonal fixed operation that is established under an RBE schedule to be evaluated every 12 months would need to show a frequency of every 12 months, not to exceed 13 months.) Determine the percentage of evaluations that were made at the required interval for each establishment.

        Example folder for Seasonal Fixed: Clarkston Dairy Fill
        Accreditation Period: February 10, 2003 – February 10, 2006
        Operating period: May - October
        First evaluations in period: May 20, 2003
        Next routine: August 30, 2004
        Next routine: September 30, 2005
        Next routine: No evaluation (OK- not due until October 2006)
        Number of evaluations due = 3
        Number of evaluations conducted at proper frequency = 3
        Percentage of evaluations = 100%

    c.   <u>Vending:</u> One-third of each operator's vending machine locations are required to be evaluated each year. Every vending machine location must be evaluated over a three-year period. Since only one file will be evaluated during this review, a log of all vending locations, showing inspection dates, will be reviewed to demonstrate that inspections are done within the three-year period.

How to judge compliance with MPR 2

- Evaluation frequency based upon Food Law, Section 3123
- An individual establishment will be considered to meet evaluation frequency when 80% of the required routine evaluations have been made (i.e. six evaluations required; five evaluations conducted).
- **Met** – 80% of the establishments in the sample meet evaluation frequency. Example: 22 establishments in sample, 18 establishments are required to meet evaluation frequency.
- **Met with Conditions** – Less than 80% of the establishments in the sample meet evaluation frequency; however, at least 80% of the total number of evaluations required for all of the establishments in the sample have been conducted. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – Less than 80% of the establishments meet evaluation frequency requirements. Less than 80% of the total number of evaluations required for all of the establishments in the sample have been conducted.

EVALUATION FREQUENCY USING A RISKED BASED EVALUATION SCHEDULE

A local health department may utilize an optional MDA "Risk Based Evaluation Schedule." For those agencies, evaluation frequencies will be audited utilizing that schedule. See Risked Based Evaluation Schedule, MDA memo dated November 13, 2008.

Tips for Passing MPR 2

- Arrange files in chronological order.
- Schedule routine evaluations to be conducted one month prior to the next evaluation due date. This will allow a 60-day window for meeting the MPR.

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- Plan ahead. Each local health department has the option of using a Risk Based Evaluation Schedule to manage their program more effectively. If a facility is on a reduced evaluation schedule, have the new schedule clearly designated so the auditor can determine frequency compliance. (Example: marked in the file or in a database, etc.)

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MPR 3
Temporary Food Service Establishment Evaluations

Materials necessary for auditing the MPR

- Local health department temporary food service establishment files (licenses and evaluations) for the three- year review time period.

Sample Selection

- Use the "Annex 6 – Office Sample Size Chart" to determine the number of records for review.
- Use "Annex 5 – Approved Random Sampling Methods" to select the sample.
- Use the total number of temporary food service establishment licenses issued over the past three years as the basis for determining sample size. (The annual number of licenses may be located on the MDARD Annual Report. Use this number and multiply by three to obtain the number of licenses over the three-year review period.)
- Where there are multiple offices, a proportional sample should be selected to reflect the percentage of establishments regulated by each individual office (i.e. 35% of the establishments are located in County A and 65% are in County B).
- Select a proportional amount for each year reviewed.

Program Indicators

- Determine if the local health department has conducted an operational evaluation of each temporary food service establishment prior to licensure.
- Determine if the temporary food establishment application sections of page one: Applicant/Business Contact Information, Public Event Information, and the Food column of the table on page two are completed. Determine if all fields of the license form have been completed with the evaluation date, the date the license was approved, and the sanitarian's signature. Determine if Appendix A of the application form when used has been completed.
- Determine if a temporary food service license was issued with unresolved Priority or Priority Foundation violations.

An individual licensing record would not be considered to meet the standards if any one of the above conditions is observed.

How to judge compliance with MPR 3

- **Met** – At least 80% of the licensing records in the sample meet the standards.
- **Met with Conditions** – Overall, operational evaluations are being properly conducted and there are no unresolved critical violations in at least 80% of the records in the sample; however, there are some occasional recordkeeping problems that tip the scale below the 80% cut-off. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – Less than 80% of the licensing records in the sample meet the standards.

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Tips for passing MPR 3

- Conduct an operational evaluation of all temporary food service establishments prior to licensure.
- Use the MDARD "Food Service Establishment Evaluation Report," form (FI-214).
- Review the application, license, and evaluation reports to make certain they are complete and accurate.
- Do not make notes on evaluation reports that resemble violations (i.e. hold all cold foods at 41°F and below). Use "Fact Sheets," "Temporary Food Establishment Operations Checklist," etc., to convey educational information.
- All Priority or Priority Foundation violations must be corrected before issuing a Temporary Food Establishment License.
- Conduct quality assurance reviews of the completed licenses and evaluation.

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MPR 4
Evaluation Procedures

Materials necessary for auditing the MPR

- The materials and sample used to evaluate MPRs 2 and 3 are used to evaluate MPR 4.

Program Indicators

- Determine if the Local Health Department uses an evaluation report form approved by the MDARD.
- Administrative information about the establishment's legal identity, address, and other information is entered on the evaluation report form.
- The report findings properly document and identify Priority, Priority Foundation, and Core violations.
- The evaluation report summarizes the findings relative to compliance with the law.
- The report is legible.
- The report conveys a clear message.
- The narrative clearly states the violations observed and necessary corrections.
- Timeframes for correcting Priority, Priority Foundation, and Core violations are specified.
- The evaluation report is signed and dated by the sanitarian.
- The evaluation report is signed by an establishment representative.

(Note: The pre-opening inspection that is marked "Approved to Open" is considered to be a routine inspection.)

An establishment folder will be considered to meet the standard when 80% of the evaluation records reviewed meet all of the above concerns (i.e. five out of six evaluation reports meet all of the standards).

How to judge compliance with MPR 4

- **Met** – 80% of the establishments in the sample meet the standard.
- **Met with Conditions** –Priority, Priority Foundation, and Core violations are being properly identified in 80% of the establishments. Approved evaluation report forms are used; however, occasional clerical omissions bring the compliance rate slightly below 80%. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – Less than 80% of the establishments in the sample meet the standard.

Tips for passing MPR 4

- Use an approved computer generated evaluation report writing system.
- Use the MDARD evaluation report form.
- Develop an in-house quality assurance system whereby a supervisor or trainer reviews reports periodically.
- Do not write phrases on the report such as "OK" and "Corrected at time of evaluation" for Priority, Priority Foundation, and Core violations. Document the specific action that has been taken to correct the Priority, Priority Foundation, and Core violations.

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MPR 5
Demonstration of staff Field Review

Materials necessary for auditing the MPR

# inspectors per agency	Establishments visited per agency
1-2	Minimum of 2 inspections
3-6	4 inspections
7+	75% of inspectors, max of 12 inspections

- Show demonstration of risk-based evaluations by a variety of program staff; when possible, each establishment visit must be with a different inspector. A maximum of one standardized trainer who is currently conducting routine inspections may be used.
- A list of all staff doing routine inspections shall be provided to MDARD prior to the audit. The list of inspectors going out with MDARD will be provided to the local health department on the Friday prior to the audit. MDARD will use a random number generator to choose the inspectors being evaluated, and MDARD will also chose the establishments by random numbers. Only high risk facilities (Z) will be chosen for this review.
- Demonstrate that Risk Factors and Good Retail Practices in the establishments are correctly identified and resolved.

How to judge compliance with MPR 5

- **Met** – 80-100% department compliance with risk based evaluation methodology.
- **Met with Conditions** – 70-79% department compliance with risk based evaluation methodology.
- **Not Met** –Less than 70% department compliance with risk based evaluation methodology.

Tips for passing MPR 5

- Make certain staff is appropriately trained to conduct risk based evaluations.
- Have inspectors document observed violations whether corrected at time of evaluation or not.
- Conduct internal quality assurance audits to make certain that staff is properly identifying intervention and risk factor violations and good retail practice violations.

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Section II: Food Service

MPR 6
Records

Materials necessary for auditing the MPR/Sample Selection

- The materials and sample used to evaluate MPRs 1- 4 and 7-12 are used to evaluate MPR 6.

Program Indicators

- Records are maintained in accordance with "Annex 3 – Excerpt from the Michigan Department of Health & Human Services (MDHHS) General Schedule #7."
- The local health department staff is able to retrieve the records necessary for the audit.
- Applications and licenses are processed in accordance with law. Complete application information includes:
  a. The date of issuance.
  b. The date(s) of operational inspections for Special Transitory Food Units.
  c. Signatures (approved electronic signatures are acceptable) of the operator and signature of a person designated by the department and/or their assignees are provided.
  d. Pre-opening evaluation report is dated either before or on the same day the license is signed.

How to judge compliance with MPR 6

- **Met** –80% of overall records are in compliance
- **Met with Conditions** - 70-79% of compliance overall record keeping.
- **Not Met** –Less than 70% of compliance in recording keeping.

Tips for passing MPR 6

- Assign one person the responsibility for maintaining the filing system.
- Use "out-cards" when removing records from the filing system.
- Do not hold licensing materials. Process them immediately. Follow the enforcement procedure if there are problems preventing licensure.

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MPR 7
Enforcement

Materials necessary for auditing the MPR

- Copy of the local health department's enforcement policy.
- The records and sample used to evaluate MPR 4.

Program Indicators

- Determine if the enforcement policy affords notice and opportunity for a hearing equivalent to the Administrative Procedures Act, Act 306 P.A.1969.
- The policy is compatible with Chapter 8 of the 2009 Food Code, and the Michigan Food Law.
- Determine if the department's policy has enforcement procedures for addressing unauthorized construction, operating without a license, imminent health hazards, continuous or recurring Priority and Priority Foundation violations.
- Verify if the policy has been adopted and signed by the Health Officer or designee.
- Review the past three years of evaluation reports from the sample of establishments to determine if the department's enforcement policy is being followed. An individual establishment folder will be considered to be in compliance when the appropriate action specified in the enforcement policy is taken to eliminate (see MDARD's "Model Enforcement Policy" for definitions):
    o Operation without a license.
    o Imminent health hazards.
    o Continuous Priority, Priority Foundation and Core violations.
    o Recurring Priority and Priority Foundation violations.

- Construction is not allowed prior to plan approval.
- Stop work orders and other enforcement actions are taken when construction related problems are observed.

How to judge compliance with MPR 7

- **Met** – At least 80% of the establishment folders reviewed indicate the enforcement policy is being followed and plan review records indicate that when the department learns that construction is occurring prior to plan approval, appropriate action is taken. An enforcement policy that meets the evaluation criteria has been adopted.
- **Met with Conditions** – An enforcement policy that meets the evaluation criteria has been adopted. At least 80% of the establishment folders indicate the enforcement policy is being followed; however, there is at least one example of a significant lack of enforcement action that could have public health consequences. Overall the department is taking action to prevent construction prior to plan approval, but there are one or two technical aspects that need to be addressed. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – Less than 80% of the establishment folders indicate the enforcement policy is being followed. An enforcement policy that meets the evaluation criteria has not been adopted.

Tips for passing MPR 7

- Use MDARD's "Model Enforcement Policy."
- Make certain that the model has been adopted by the health officer or designee. The mere presence of a draft of MDARD's model policy in a folder is not sufficient.
- Conduct routine quality assurance reviews to make certain staff are following the enforcement policy.

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MPR 8
Follow-up Evaluation

Materials necessary for auditing the MPR/ sample selection

- The materials and samples used to evaluate MPR 4 are used to evaluate this MPR.

Program Indicator

- A follow-up evaluation shall be conducted by a local health department, preferably within 10 calendar days, but no later than 30 calendar days, to confirm correction of all previously identified Priority and Priority Foundation violations
- Information about the corrective action is described on the evaluation report. This includes violations that are corrected at the time of evaluation. For evaluations that do not require an onsite follow-up review see MDARD memo dated 2-19-10
- A separate report form is used to record the results of the follow-up evaluation.
- An individual establishment will be considered to meet the standard when 80% of the follow-up evaluations are conducted within 30 calendar days.
- If not more than 2 Priority Foundation item violations are noted and the director determines that the violations are not a risk to food safety, the director may confirm correction of the priority foundation item violations at the next routine evaluation.

How to judge compliance with MPR 8.

- **Met** - at least 80% of the establishments in the sample meet the standard.
- **Not met** - less than 80% of the establishments in the sample meet the standard.

Tips for passing MPR 8

- Create a tracking system to assure that follow-up evaluations are conducted.

Section II: Food Service

Enforcement

MPR 9
License Limitations

Materials necessary for auditing the MPR

- Local health department policy manual
- Local health department list of establishments having licenses limited during the review period.

Sample Selection

- Ask the local health department for a list of establishments having a license limitation issued during the review period.

Program Indicators

- Determine if the reasons for limiting a license are in accordance with the Food Law:
  a. The site, facility, sewage disposal system, equipment, water supply, or the food supply's protection, storage, preparation, display, service, or transportation facilities are not adequate to accommodate the proposed or existing menu or otherwise adequate to protect public health.
  b. Food establishment personnel are not practicing proper food storage, preparation, handling, display, service, or transportation.
- Determine if proper notice of the limitations have been provided to the applicant along with an opportunity for an administrative hearing.
- Determine if the license application is appropriately completed to indicate the establishment has a limited license.

How to judge compliance with MPR 9

Note: It is unlikely that many licenses will have been limited over the three (3) year review cycle; therefore, a percentage allowance is not feasible.

- **Met** – The department issues limited licenses in accordance with the Food Law.
- **Met with Conditions** – Overall the department issues limited licenses in accordance with the Food Law, but there are some minor deviations that need attention. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – The department does not issue limited licenses in accordance with the Food Law.

Tips for passing MPR 9

- Develop a form letter for issuing limited licenses that includes legal notice requirements.
- Develop an internal review procedure that promotes uniformity.

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MPR 10
Variances

Materials necessary for auditing the MPR

- Local health department policy manual.
- Local health department list of variances evaluated during the review period.

Sample Selection

- Ask the local health department for a list of establishments having been issued a variance during the review period.

Program Indicators

- Determine if variances are required for specialized processing methods as required by Section 3-502.11 of the Food Code.
- Determine if the applicant's variance request is maintained in the file.
- Determine if the applicant has provided a statement of the proposed variance of the Food Code citing relevant code section numbers, an analysis of the rationale for how the public health hazards addressed by relevant code sections will be alternately addressed by the proposal, and a HACCP plan if required.
- Determine if the department has a formal procedure for issuing variances.
- Determine if staff is following the department's procedures.

How to judge compliance with MPR 10

Note: It is unlikely that many variances will have been issued over the three-year review cycle; therefore, a percentage allowance is not feasible.

- **Met** – The department issues variances in accordance with the Food Code.
- **Met with Conditions**– Overall the department issues variances in accordance with the Food Code but there are some minor deviations that need attention. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – The department does not issue variances in accordance with the Food Code.

Tips for passing MPR 10

- Develop in-house procedures for issuing variances.
- Form an internal review procedure that promotes uniformity.

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MPR 11

Consumer Complaint Investigation (non-foodborne illness)

Materials necessary for auditing the MPR

- Local health department complaint tracking system
- Selected complaint files
- Local health department policy manual

Sample Selection

- Use "Annex 6 - Office Sample Size Chart" to determine the number of records for review.
- Follow "Annex 5 - Approved Random Sampling Methods" guide to select the sample from the complaint tracking system.
- Use the total number of complaints received over the past three years as the basis for determining sample size.

Program Indicators

- Determine if a consumer complaint tracking system has been created.
- Determine if consumer complaint investigations are initiated within 5 working days.
- Determine if the findings (a brief notation that explains the results and conclusions of the investigation) are noted either in the logbook or on the filed complaint record.

How to Judge Compliance with MPR 11

- **Met** – The department maintains a consumer complaint tracking system. At least 80% of the records reviewed indicate the department initiates complaint investigations within five working days and documents the findings.
- **Met with Conditions** - The department maintains a consumer complaint tracking system. At least 80% of the records reviewed indicate the department initiates investigations within five working days, but there are some minor documentation problems. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – The department does not maintain a complaint log book and/or less than 80% of the records reviewed indicate the department initiates complaint investigations within five working days, and/or the department does not document the findings.

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MPR 12
Staff Training and Qualifications-- Technical Training

Materials Necessary for Auditing the MPR

- Training files for every new employee hired or assigned to the food service program during the last review period

Sample Selection

- The training record for each employee is reviewed.

Program Indicator
- Determine if the training record indicates each individual has completed training in the six designated skill areas:
  a. Public health principles.
  b. Communication skills.
  c. Microbiology.
  d. Epidemiology.
  e. Food Law, Food Code, related policies.
  f. HACCP) within 12 months of being assigned to the program. Employees that are not fully assigned to the food program or part time employees have 18 months to complete training.

- The local health department's judgment as to the completeness and complexity of the training for each skill area must be documented.
- Documentation of previous training or evaluations performed under a training plan by the Director of a new sanitarian that has completed training at another local health department or has similar experience.

Note: Employees only involved in the evaluation of specialty food service establishments are not included in the evaluation for MPR 12.

How to Judge Compliance with MPR 12

- **Met** – The training record for each employee indicates that training has been completed in the six designated skill areas within 12 months from the date of being assigned to the program. Employees that are not fully assigned to the food program or part time employees have completed training in18 months.
- **Met with Conditions** - The training record for each employee indicates that training has been completed in the six designated skill areas, but the training period exceeded 12 months for full time employees or 18 months for the employees that are not fully assigned to the food program. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – Either training records are not maintained or the records indicate that training has not been completed in the six designated skill areas.

Tips for Passing MPR 12

- Completion of recommended ORA U. curriculum or equivalent courses.
- To assess the technical training of a newly hired / newly assigned food inspector, use the Technical Training section of the MDARD: FOOD PROGRAM TRAINING NEWLY HIRED / NEWLY ASSIGNED FOOD PROGRAM INSPECTORS: (Can be found in Resources for Regulators / Training http://www.michigan.gov/mdard/0,4610,7-125-50772_50775_51204---,00.html)
- To assess the technical training of a Previously Trained / Experienced Inspector, use the Technical Training Requirements section of the MDA: FOOD PROGRAM TRAINING - Assessing the Risk Based Inspection Skills of a Previously Trained / Experienced Inspector (Can be found in Resources for Regulators / Training / http://www.michigan.gov/mdard/0,4610,7-125-50772_50775_51204---,00.html)

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MPR 13
Fixed Food Service Evaluation Skills

Materials Necessary for Auditing the MPR

- Training files for every new employee hired or assigned to the food service program during the last review period.

Sample Selection

- The training record for each employee is reviewed.

Program Indicator

- Determine if the training record indicates if 25 joint evaluations, 25 independent evaluations under the review of the trainer (either on-site or paperwork review), and 5 evaluation inspections have been conducted with the standardized trainer within 12 months of employment or assignment to the food program. Employees that are not fully assigned to the food program or part time employees have 18 months to complete training. Employees only involved in the evaluation of specialty food service establishments are exempt.
- Documentation of previous training or evaluations performed under a training plan by the Director of a new sanitarian that has completed training at another local health department or has similar experience.

How to Judge Compliance with MPR 13

- **Met** - The training record for each employee with no previous applicable experience indicates 25 joint evaluations with the standardized trainer, 25 independent evaluations under the review of the standardized trainer, and five evaluation inspections have been conducted with the standardized trainer within 12 months of employment or assignment to the food program. Employees not fully assigned to the food program have completed the training in 18 months.
- **Met with Conditions** – The training record for each employee indicates 25 joint evaluations, 25 independent evaluations under the review of the trainer, and five evaluation inspections have been conducted with the standardized trainer, but there is evidence that independent evaluations were being conducted prior to the completion of training. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met".
- **Not Met** – Either training records are not maintained or the records indicate 25 joint evaluations, 25 independent evaluations, and five evaluation inspections have not been completed within 12 months of employment or assignment to the food program, and the employee is conducting independent evaluations. For employees not fully assigned to the food program, training was not completed within 18 months of employment or assignment to the food program, and the employee is conducting independent evaluations.

Tips for Meeting MPR 13

- A training assessment is recommended for a sanitarian new to a department who has become qualified and experienced while working in another local health department. The assessment should consist of a document review of the inspector's credentials as well as a field skill review. A training plan should be developed based on the review. To assess the training of a newly hired / newly assigned food inspector, use the Fixed Food Service Evaluation Skills Training section of the MDARD: FOOD PROGRAM TRAINING - NEWLY HIRED / NEWLY ASSIGNED FOOD PROGRAM INSPECTORS: (Can be found in Resources for Regulators / Training / http://www.michigan.gov/mdard/0,4610,7-125-50772_50775_51204---,00.html)
- To assess training of a Previously Trained / Experienced Inspector, use the Fixed Food Service Evaluation Skills Training Requirements section of the MDARD: FOOD PROGRAM TRAINING - Assessing the Risk Based Inspection Skills of a Previously Trained / Experienced Inspector: (Can be found in Resources for Regulators / Training / http://www.michigan.gov/mdard/0,4610,7-125-50772_50775_51204---,00.html)

For technical assistance, please contact Sean Dunleavy at 517-243-8895 or dunleavys@michigan.gov

Section II: Food Service

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MPR 14
Specialty Food Service Evaluation Skills

Materials Necessary for Auditing the MPR

- Supervisor endorsement for every newly assigned employee to the specialty food service program. Employees include those who may be occasionally asked to evaluate specialty food service establishments (temporary, Special Transitory Food Unit, vending, mobile).

Sample Selection

- Supervisor endorsement for each employee is reviewed.

Program Indicators

- Determine if the supervisor has endorsed all employees who evaluate specialty food service establishments (mobile, vending, STFU, temporary) as having knowledge of the Food Law, Food Code, public health principles, and communication skills. Each employee must be endorsed for each type of specialty food service facility they evaluate. Automatic endorsement is received when an employee has met the requirements of MPR 12 and 13.

How to Judge Compliance with MPR 14

- **Met** – Supervisor endorsement for each newly assigned employee involved in the evaluation of specialty food service establishments is completed before conducting independent evaluations.
- **Met with Conditions** - The supervisor endorsement for each newly assigned employee involved in the evaluation of specialty food service establishments is completed, but a newly assigned employee conducted independent evaluations prior to supervisor endorsement. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – Supervisor did not evaluate and endorse a newly assigned inspector before conducting independent evaluations for each type of assigned establishment.

Tips for meeting MPR 14

- Develop a formal written training plan for employees occasionally assigned to various aspects of the program.
- Maintain a training folder for each employee.

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MPR 15
Foodborne Illness Investigations- Timely Response

Materials Necessary for Auditing the MPR

- Local health department foodborne illness investigation policy manual
- Complaint log or tracking system
- MDARD list of local health department foodborne illness investigation reports
- Foodborne illness investigation records generated since the last accreditation review

Sample

- A maximum random sample of 10 foodborne illness investigation records for the review period will be evaluated.

Program Indicators

- Determine if foodborne illness complaint investigations are initiated within 24 hours. "Initiated" includes the initial contact, phone calls, file reviews, etc., made by the person responsible for conducting the investigation.
- Determine if the local health department has submitted a copy of the final written report to MDARD within 90 days after the investigation has been completed.

How to Evaluate Compliance with MPR 15

- **Met** – At least 80% of the foodborne illness investigations records reviewed contain all of the following elements: a) all foodborne illness complaint investigations are initiated within 24 hours, and b) all final written reports are submitted to MDARD within 90 days of investigation completion.
- **Met with Conditions** – Compliance with the above 70% of the time. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – Compliance with the above less than 70% of the time.

Section II: Food Service

MPR 16
Foodborne Illness Investigation Procedures

Materials Necessary for Auditing the MPR

- Local health department foodborne illness investigation policy manual
- Complaint log or tracking system
- Documentation of complaint log/tracking system reviews
- MDARD list of local health department foodborne illness investigation reports
- Foodborne illness investigation records generated since the last accreditation review

Sample

- A maximum random sample of 10 foodborne illness investigation records for the review period will be evaluated.

Program Indicators

- Determine if the complaint log or tracking system is systematically reviewed to determine if isolated complaints may indicate the occurrence of a foodborne illness outbreak.
- Determine if the department has and follows standard operating procedures for foodborne disease surveillance and investigating foodborne illness outbreaks that include:
    a. A description of the foodborne illness investigation team and the duties of each member.
    b. Identify the frequency for reviewing the complaint log or tracking system for trends, who will review it, and how the reviews will be documented.
    c. Outline the methods used to communicate foodborne illness information with local health department employees, other governmental agencies, and organizations.
- Determine if the department uses procedures consistent with those contained in "Procedures to Investigate a Foodborne Illness," 5th edition, published by the International Association for Food Protection.
- Determine if the department is using the proper forms for investigating foodborne illness complaints.
- Determine if the department follows MDARD's February 3, 2006 memo, titled: "Foodborne Illness Reporting and Documentation for Minimum Program Requirement Compliance."

How to Evaluate Compliance with MPR 16

- **Met** – Standard operating procedures that meet MPR 16 are in place and are followed.
- **Met with Conditions** – Overall the department has and follows standard operating procedures that meet MPR16, however, some minor exceptions need to be addressed. This indicator will be required to be met at the next scheduled accreditation evaluation. Failure to meet this indicator will result in a "Not Met."
- **Not Met** – Written operating procedures that meet MPR 16 have not been provided and/or the procedures outlined in MPR 16 for investigating foodborne illness outbreaks are not being followed.

Tips for Passing MPR 15 and 16

- Recommend completion of Basic online F.I.R.S.T. training available through MITRAIN.
- Staff conducting foodborne illness investigations should periodically review "Procedures to Investigate Foodborne Illness, 6th edition".
- Assemble the foodborne illness investigation team at least once annually to review procedures.
- Contact local governmental agencies and organizations at least annually to review foodborne illness reporting and investigation responsibilities. Be certain to include local hospitals and the medical community in the policy.

For technical assistance, please contact Sean Dunleavy at 517-243-8895 or dunleavys@michigan.gov

Section II: Food Service

Important Factor 1
Industry and Community Relations (Equivalent to FDA Retail Standard 7)

Important Factor 1a - Industry Education Outreach

Materials Necessary for Auditing Important Factor 1

- Evidence of educational outreach to industry and community groups.
- Completion of the attached forms is recommended.
- Educational Outreach
    a. Outreach encompasses industry and consumer groups as well as media and elected officials.
    b. Outreach efforts may include industry recognition programs, web sites, newsletters, *Fight BAC!™* campaigns, food safety month activities, food worker training, school-based activities, customer surveys or other activities that increase awareness of the risk factors, and control methods to prevent foodborne illness.
    c. Outreach activities may also include posting inspection information on a web site or in the press.

Met –Agency participation in at least one activity listed under program indicator (educational outreach) annually is sufficient to meet this standard

Tips for meeting important factor 1a

- Place food safety information on the department's web site.
- Food safety training provided to the industry

OR

Important Factor 1b - Community Relations

Materials Necessary for Auditing Important Factor 1b

- Documentation to provide evidence of annual surveys or meetings held with industry and community for the purpose of soliciting food service program related recommendations and feedback.

Program Indicators
- Community and Consumer Interaction
    a. The jurisdiction sponsors or actively participates in meetings such as food safety task forces, advisory boards, or advisory committees.
    b. These forums shall present information on food safety, food safety strategies, and interventions to control risk factors.
    c. Offers of participation must be extended to industry and consumer representatives.
- Outcome
    a. The desired outcome of this standard is enhanced communication with industry and consumers through forums designed to solicit input to improve the food safety program.
    b. A further outcome is the reduction of risk factors through educational outreach and cooperative efforts with stakeholders.

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- Documentation
    a. Quality records needed for this standard reflect activities over the most recent three-year period and include:
        1. Minutes, agendas or other records that forums were conducted.
        2. For formal, recurring meetings, such documents as bylaws, charters, membership criteria and lists, frequency of meetings, roles, etc.
        3. Documentation of performed actions or activities designed with input from industry and consumers to improve the control of risk factors.
        4. Documentation of food safety educational efforts. Statements of policies and procedures may suffice if activities are continuous, and documenting multiple incidents would be cumbersome, i.e., recognition provided to establishments with exemplary records or an on-going web site.

How to Evaluate Compliance with Important Factor I

- **Met** –Agency participation in at least one activity listed under program indicator for Important Factor 1b (industry and community relations) annually is sufficient to meet this standard.

Tips for meeting Important Factor 1

- Example: Hold an annual meeting with a school or school district in your jurisdiction (industry involvement); invite the parent / teacher organization (community involvement); and discuss food safety and interventions to control risk factors.
- Place food safety information on the department's web site.

Note: Special comments will be added if a LHD meets both Important Factor 1a and 1b.

Section II: Food Service

Important Factor II
Continuing Education and Training

Materials Necessary for Auditing Important Factor II

- Certificates earned from the successful completion of course elements of the uniform curriculum.
- Contact hour certificates for continuing education.
- Other employee training records.

Program Indicators

- Each employee conducting inspections accumulates 20 contact hours of continuing education every 36 months after the initial training (18 months) is completed. The candidate qualifies for one contact hour for each hour's participation in any of the following activities:
    a. Attendance at regional seminars / technical conferences.
    b. Professional symposiums / college courses.
    c. Workshops.
    d. Food-related training provided by government agencies.

- The number of contact hours of training can be pro-rated for employees who have been on the job less than the 36-month Review Period. Employees who have limited food service responsibilities (i.e. inspect only temporary food service, vending, or seasonal food service) are not obligated to meet Important Factor II requirements.

How to Determine Compliance with Important Factor II

- **Met** – Every employee assigned to the food service program has received at least 20 contact hours of training every 36 months after the initial training (18 months) is completed.

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Important Factor III
Program Support

Materials Necessary for Auditing Important Factor III

- The total number of full time employees (FTE) assigned to the food service program.
- The total number of licensed food service establishments.

Comment

- Important Factor III is derived from the U.S. Food and Drug Administration "National Recommended Retail Food Regulatory Program Standards; Standard 8 – Program Support and Resources." The FDA Standard 8 requires a staffing level of one FTE devoted to the food program for every 280 to 320 evaluations performed. Evaluations for the purpose of this calculation include routine evaluations, re-evaluations, complaint investigations, outbreak investigations, follow-up evaluations, risk assessment reviews, process reviews, variance process reviews, and other direct establishment contact time such as on-site training.
- An average workload figure of 150 establishments per FTE, with two evaluations per year, was originally recommended in the "1976 Food Service Sanitation Manual." Annex 4 of the Food Code since 1993, has included a recommendation that 8 to 10 hours be allocated for each establishment per year to include all of the activities reflected here in the definition of an evaluation. The range of 280 to 320 broadly defined evaluations per FTE is consistent with the previous recommendations.
- The 2003 Accreditation Tool standard indicated a staffing level of 125 to 225 establishments per FTE met the "Important Factor V – Program Support and Resources" standard.

Program Indicators

- Determine the actual number of FTEs assigned to the food service program.
- Determine the number of FTEs needed to evaluate all annually licensed food service establishments (except temporary food service establishments).
  a. Recommended number of FTEs: Divide the total number of licensed establishments by 150.
  b. Minimum number of FTEs: Divide the total number of licensed establishments by 225.

- Determine the average number of FTEs required to evaluate temporary food service establishments. Divide the total number of temporary food service licenses issued per year by 300.
- Determine if the department is on a Risk Based Inspection Schedule.

How to Determine Compliance with Important Factor III

- **Met** – The actual number of FTEs assigned to the food service program meets or exceeds the calculated minimum number of FTEs required. (Minimum number FTEs for annually licensed establishments plus average number for temporary food service establishments.)

Section II: Food Service

Important Factor IV
Quality Assurance Program

Materials Necessary for Auditing Important Factor IV

- Local health department quality assurance written procedures.
- Employee training and quality control records.

Program Indicators

- Determine if:
    a. A written procedure has been developed that describes the jurisdiction's quality assurance program and includes a description of the actions that will be implemented if the review identifies deficiencies in quality or consistency.
    b. The quality assurance program includes a review of a least 15 evaluation reports for each sanitarian and/or an equivalent sample of foodborne illness investigation records every 36 months.
    c. Every employee assigned to the food service program has completed at least 3 joint evaluations with the standardized trainer every 36 months.
    d. The quality assurance program assures that evaluation reports are accurate and properly completed, regulatory requirements are properly interpreted, variances are properly documented, the enforcement policy is followed, foodborne illness investigations are properly conducted, and foodborne illness reports are properly completed.

How to determine compliance with Important Factor IV

- **Met** – A written quality assurance program has been developed. A quality assurance review is conducted at least once every 36 months. At least 15 evaluation reports for each sanitarian's food evaluation and/or foodborne illness investigation records have been reviewed. Every employee assigned to the food service program has completed at least 3 joint evaluations with the trainer every 36 months.

Section II: Food Service

Annex 1 - Corrective Plan of Action

A corrective plan of action (CPA) is expected from a local health department for each MPR indicator that has been found "Not Met" during the evaluation. The accreditation program procedure requires the original CPA to be submitted to the accreditation administrative staff. To expedite review and acceptance by the MDA, local health departments are encouraged to send a copy directly to the MDA as soon as the CPA is completed.

Deadline for Submission
The Accreditation Program Protocols and Policies 2002 states, "local health departments must submit corrective plans of action to the Accreditation Program within two months of their on-site review." For more information on the Accreditation Program Protocols and Policies, see http://www.acreditation.localhealth.net/.

1. **Content**
   - For each "Not Met" MPR, the written corrective plan of action must include:
     a. A statement summarizing the problem (i.e. 45% of the food service establishments are presently being evaluated at the required frequency).
     b. A statement summarizing the standard (i.e. all food service establishments are required to be evaluated once every six months).
     c. A detailed plan for correcting the problem, including the names of the individuals responsible for each task, training needs, time lines, etc.
     d. A procedure for monitoring the plan to make certain the plan is being carried out as intended.
     e. A description of the corrective action that will be taken if the plan is not followed.
     f. A method for evaluating results and for basing a request to the MDA to conduct an on-site follow-up to verify that the plan has worked.

2. **Follow-up Review**
   - Within no less than 90 days and no longer than one year of the accreditation review, the local health department must submit a written request for the MDA to conduct a follow-up review to demonstrate compliance with the "Not Met" indicators. A minimum of 90 days of continuous compliance is required for the indicator to be found "Met."

Section II: Food Service

Copy of Form Found On the MPHI Accreditation Site for Completion of CPA

Instructions and Guidance:
➤ Please send any additional materials to accompany this Corrective Plan of Action directly to the reviewer(s) whom performed the applicable section review.
➤ If local health department staff need assistance in developing Corrective Plan(s) of Action please contact the applicable section reviewer(s).
➤ The Corrective Plan(s) of Action must be submitted by the local health department within 60 days of the last day of the On-site Review.
➤ Follow-up action on the Corrective Plan(s) of Action must take place within 365 days of the last day of the On-site Review.
➤ In order to complete the Corrective Plan of Action submission process, the health officer must login to the Web Reporting Module using their health officer account. Once logged in, the health officer may make any final edits necessary to the form and then publish the form by checking the 'Publish' box and clicking the 'Save' button.

Date:

Local Health Dept Name: _____

Your Name: * _____

Title: * _____

Local Health Department Staff Responsible for Implementing Corrective Plan of Action

Name: *

Title: * _____

Phone: * * _____

Fax: * * _____

Indicator Not Met

Indicator Description: _____

Corrective Plan of Action (be specific and include details)
Describe Corrective Plan of Action:* *

Projected Completion Date: _____

Please explain how the Corrective Plan of Action will correct the deficiency:* *

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Section II: Food Service

Corrective Plan of Action (CPA) (be specific and include details):
Describe CPA
Include projected completion date of CPA
Explain how the proposed CPA will correct the deficiency

Are there additional materials accompanying this CPA:

○　　　◉
Yes　　No

Electronic Signature:*

_____
NOTICE: By placing your name in this box, you agree that this plan has been reviewed and approved by appropriate administrative staff, including your Health Officer.

☑　Publish

[Save]

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Section II: Food Service

Element 1 (problem summary): The accreditation review determined that 70% of restaurants reviewed had consumer advisory violations and 60% of restaurants reviewed had date marking violations. Indicator 2.8 guidance states that no violation category can be identified in the field review in more than 40% of the establishments visited.

Element 3 (detailed plan):
a. Within seven days of the MDA's acceptance of the CPA, the Environmental Health (EH) Director will convene a staff meeting for the five staff involved in routine evaluations of food establishments. This meeting will discuss and begin implementation of the CPA.
b. The agency has just completed sending each food establishment: a consumer advisory pamphlet; an MDA date marking fact sheet; and a cover letter outlining the problem, explaining the need for increased attention to these two areas by operators, explaining the public health reasons for these requirements, and advising operators of the increased focus on these areas during upcoming evaluations. In addition, copies of these documents will be carried by inspectors during routine evaluations for distribution as needed.
c. Within 20 days of acceptance of the CPA, the agency standardized trainer will conduct a four-hour, office-based training on date marking and consumer advisory requirements. The training will involve sanitarians completing practical exercises to improve skills in problem areas. Our MDA area consultant will be asked to review the training curriculum in advance.
d. The agency standardized trainer will initially conduct three joint evaluations with each sanitarian within the first 30 days after completion of office training to assure that the date marking and consumer advisory requirements are being applied properly and uniformly. The joint visits will be made to the same types of facilities that were visited during the MDA review.
e. Staff will cite violations observed during routine evaluations for date marking and consumer advisories, inform establishments, in writing, of requirements for correction and conduct follow-ups as necessary to assure compliance.
f. Enforcement action according to the agency enforcement policy will be conducted against establishments which fail to correct date marking and consumer advisory violations. In summary, the enforcement steps are: If a violation is noted on two routine evaluations and corrected each time or if a violation is not corrected after the first follow-up evaluation, the sanitarian will work with the PIC to develop and implement a RISK CONTROL PLAN. Should the risk control plan not be effective in gaining long-term compliance, an office conference will be held as the first step in progressive enforcement.
g. A follow-up mailing to licensed establishments will be made after the MDAs next review to advise (and hopefully praise) industry of the success of their efforts. This follow-up will be incorporated into the department's food safety newsletter sent approximately twice per year.

Element 4 (monitoring procedure):
A. An office quality assurance review will be conducted by the EH Director and standardized trainer. Files for full-service establishments will be selected for review. The review will determine that consumer advisory and date marking violations are properly documented and corrected.
B. A trend analysis will be conducted to determine the percentage of facilities receiving violations for the two problem areas, to determine consistency between staff, determine violation percentages for full service facilities as compared to the MDA evaluation report and track trends over time.
C. The agency standardized trainer will initially conduct a minimum of one joint evaluation with each sanitarian approximately 90 days after completion of the previous joint evaluations to assure that the date marking and consumer advisory requirements are being applied properly and uniformly. The joint visits will be made to the same types of facilities that were visited during the MDA review.

Element 5 (correction if plan not followed): Additional training will be provided for specific staff as needed, based on the monitoring plan results.

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Section II: Food Service

Element 6 (Method for verification): Once the office and field reviews determine that the plan has been successful in reducing the level of violation for the problem areas in full service facilities to less than 20%, and within the one year follow-up deadline, an MDA revisit will be requested.

Section II: Food Service

Annex 2 - Moot Point Principle

The Principle
The principle applies when an MPR deficiency has been detected by the local health department during a review cycle through the normal quality assurance process, action has been taken to correct the deficiency, and there is no likelihood that the deficiency will recur.

Application
The MPR in question is considered to be "Met" providing the following elements are documented and demonstrated:
The deficiency has been completely corrected and in place for at least 12 months prior to the evaluation.
The deficiency is not likely to recur.

Example showing when a moot point principle is applicable: Concrete steps have been taken to prevent recurrence.

Problem: Evaluations were not being conducted at the proper frequency.
Solution: One additional sanitarian was assigned to the program. A computer tracking system has been installed. Computer generated reports are routinely evaluated by management. Corrective action is taken as needed. Evaluations are now being conducted at the proper frequency.

Example showing when a moot point principle is not applicable: Improvements are noticed but concrete action to prevent recurrence is not documented.

Problem: Evaluations were not being conducted at the proper frequency.
Solution: Evaluation frequency was satisfactory during the 12-month period prior to the review. There is no documented management oversight system or other improvements to explain why the change occurred and why the problem will not recur.

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Annex 3 – Excerpt from MDHHS General Schedule #7

Record Type	Minimum Retention Period (Years)
Evaluation Reports	CR + 5
License Applications	CR + 5
Annual Food Service Establishment Licenses	CR + 5
Routine Correspondence	CR + 3
Temporary Food Establishment Licenses	CR + 3
Legal Documents	CR + 10
Enforcement Actions	CR + 10
Food Outbreak Investigations	CR + 5
Water Supply Information	PERM – May destroy after 3 years if the establishment is connected to municipal water
Sewage Disposal Information	PERM – May destroy after 3 years if the establishment is connected to municipal sewer
Construction Plans & Specifications	5
Permanently closed establishment Plans and Specifications	3
Consumer Complaints	CR + 3

CR = Creation
PERM = Permanent

Reference: Michigan Food Law 2000, as amended Section 3121(2), (3), (4)

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Section II: Food Service

Annex 4 - Procedure for Conducting Accreditation Re-evaluations of Local Health Departments

Purpose
To determine if a local health department has met the minimum program requirements (MPRs) that were found to be "Not Met" during the initial accreditation evaluation.

Background
The Michigan Local Public Health Accreditation Program requires a local health department to request a re-evaluation for all MPRs that were found to be "Not Met" between 90 days and one year of the accreditation review. Failure to request a re-evaluation within one year will result in "Not Accredited" status.

Re-evaluation to Determine Compliance Using Option 1 or 2

Option 1   MDA will follow the Policy/Procedure and Evaluation described below to evaluate the MRP as Met / Not Met / Met with Conditions

Option 2   OFFICE: With the use of Option 2, the only time MDA would do an accreditation revisit would be if the CPA put in place and evaluated after at least 90 days by the local health department was not effective.

FIELD: Since a self-assessment is not done by the local health department for Option 2 (QA should show field compliance) the local health department staff is evaluated during the accreditation visit. If MPR 7 or 8 receives a Not Met, a CPA and revisit are required. This would entail the MDA auditor to accompany and re-evaluate all staff who participated in the Option 2 field review.

Policy/Procedure
- The re-evaluation will assess only those MPRs found to be "Not Met" during the initial evaluation.
- The re-evaluation will encompass the time period beginning with the implementation of the CPA.
- For review of office MPRs: "Annex 6 - Office Sample Size Chart" and "Annex 5 - Approved Random Sampling Methods" guide will be used. Files selected for review will be limited to those reflecting work performed under the CPA. The re-evaluation may intentionally include previously reviewed records and establishments in order to assess progress.
- For review of Field MPRs: Facilities chosen for the initial accreditation review, that did not meet the requirements during the initial assessment, will be again assessed for compliance.

Evaluation
MDA will review the following:
- The deficiencies found in the original evaluation
- The CPA
- The action taken to resolve the deficiencies
- Results of the action

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Section II: Food Service

How to Judge Compliance

- **Met** - The program indicator meets the definition of "Met" in the MPR Indicator Guide used during the original evaluation.
- **Met with Conditions** - Substantial progress has been made. Continued implementation of the CPA will reasonably result in compliance.
- **Not Met** - Not in compliance without a reasonable expectation of being in compliance in the near future.

Exit Interview
An exit interview will be conducted with the appropriate management staff.

Notification
MDA will enter the results of the re-evaluation into the MPHI accreditation website.

Waiver of On-Site Review
The MDA may waive the on-site review if it is possible to determine compliance from documentation submitted to MDA.

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Section II: Food Service

Annex 5 - Approved Random Sampling Methods

Random number sampling introduces less bias than any other sampling method available. The objective is that every item on the list being used has an equal chance of being selected. For accreditation, the MDA uses a simple random sampling method to draw all samples. The MDA may place criteria on certain samples, thereby rejecting the selected document or file as not meeting predefined criteria, and then randomly selecting another, until one is drawn that meets the criteria.

See the Self-Assessment Guidance Document for examples.

To use a random selection method, it is necessary to have a list of the items to be selected from (i.e. licensed establishment list, plan review log, complaint log, etc.)

Method #1: Random number generating calculator, computer software, or hard copy random number table.

Select random numbers between the minimum and maximum number from the list being used. For example, you have a list of 175 fixed food service establishments, and you want to select five establishments from the list.

Use the calculator, software, or random number table to select five random numbers from 1 to 175. Should the same number be generated twice, reject the duplicate and select another random number. For example, let's say the numbers selected are: 32, 86, 12, 143, and 106. You would then count from the beginning of the establishment list and choose the 12th, 32nd, 86th, 106th, and 143rd establishments.

Method #2: Select every Kth facility

Select random numbers between the minimum and maximum number from the list being used. For example, you have a list of 175 fixed food service establishments, and you want to select five establishments from the list.

1. Number the list, starting with 1.
2. Have another individual select a number from 1-175 (the selected number may include 1 and 175). Let's say 40 is selected. Use the selected number 40 as the starting point.
3. Divide the total number of establishments 175 by the sample size 5. [175/5 = 35.] This means that every 35th establishment file will be selected for review.
4. Now find the 40th establishment from the beginning of the list. This is the first file that will be reviewed. Next count forward 35 establishments to find the second file to be reviewed. Continue until five establishment files have been selected. When you reach the end of the list, continue counting from the beginning. You should have selected the following establishments: 40, 75, 110, 145, and 5. Should you need to select more than five, start over with #2 above to avoid selecting items previously selected.

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Section II: Food Service

Annex 6 – Office Sample Size Chart

Determine the number of food establishments licensed, plan reviews conducted, temporary licenses issued, complaints investigated, etc., that a sample is to be drawn from. Find that number under population size, and then find the number of files to be reviewed under sample size.

Population Size	Sample Size (n)*
4	3
5	4
6-7	5
8-9	6
10-13	7
14-16	9
17-19	10
20-23	11
24-27	12
28-32	13
33-39	14
40-47	15
48-58	16
59-73	17
74-94	18
95-129	19
130-192	20
193-340	21
341-1154	22
1155 +	23

Annex 7 – Computer Records
This Annex has been removed for Cycle 6.

For technical assistance, please contact Sean Dunleavy at 517-243-8895 or dunleavys@michigan.gov

Section II: Food Service

Annex 8 - Accreditation Review Document Summary

The following are the typical documents needed by food service program reviewers that must be available during a review.

MDA Provided Documents
- ❑ Licensed facility list to draw samples from and lists of files randomly selected for review.
- ❑ Log of foodborne illness reports submitted to MDA.
- ❑ Field and office review worksheets.

Local Health Department Provided Documents
- ❑ For Evaluation of Minimum Program Requirements (MPRs)
- ❑ Documentation relating to moot point principle. See MPR Indicator Guide, Cycle 5, Annex 2.
- ❑ Plan Review Log.
- ❑ Plans review files selected for review (all documents and plans relating to review). List of specific files selected will be provided during review.
- ❑ Establishment file for plans selected (pre-opening evaluation and license are needed).
- ❑ Establishment files selected for review (complete and current file, may include, fixed, mobile, STFU, vending, etc.). List of specific files selected will be provided during review.
- ❑ Temporary licenses and evaluations for review period.
- ❑ List of establishments having their licenses limited during review period. Enough information should be on this list to allow these files to be retrieved and reviewed, if requested.
- ❑ List of variances evaluated during review period. Enough information should be on this list to allow these files to be retrieved and reviewed, if requested.
- ❑ Consumer food complaint log and selected complaint files.
- ❑ Foodborne illness complaint log and selected complaint and outbreak investigation files.
- ❑ IAFP 5th edition "Procedures to Investigate Foodborne Illness."
- ❑ Training files for every new employee hired or assigned to the food program since the last accreditation visit. Employees include those who may be occasionally asked to evaluate specialty food service establishments (temporary, STFU, vending, mobile).
- ❑ Policy and procedure documents relating to:
  - o plan review (including forms used)
  - o conducting evaluations and preparing evaluation reports
  - o licensing, including license limitations
  - o enforcement, including documentation of policy adoption (by whom and date adopted)
  - o variances
  - o consumer complaint investigation
  - o foodborne illness complaint and outbreak investigation
  - o vending evaluation frequency

For Evaluation of Important Factors
- ❑ I - Documentation - quality records needed for this standard reflect activities over the most recent three-year period and include:
  - o Minutes, agendas or other records that forums were conducted,
  - o For formal, recurring meetings, such documents as by- laws, charters, membership criteria and lists, frequency of meetings, roles, etc.,
  - o Documentation of performed actions or activities designed with input from industry and consumers to improve the control of risk factors, or
  - o Documentation of food safety educational efforts. Statements of policies and procedures may suffice if activities are continuous, and documenting multiple incidents would be cumbersome, i.e., recognition provided to establishments with exemplary records or an on-going web site.
- ❑ Employee training records.
- ❑ III- Documentation of the total number of FTE's assigned to the food service program.
- ❑ IV- Food service program's quality assurance written procedures.

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Annex 9 – Approximate Review Timeline for a Single Office Agency

USING OPTION I

Day	Activity	Documents Needed*	Provided By
I	Field Review: Review list of facilities to be visited. Arrange for LHD staff to accompany MDA field reviewer.	List of establishments to be visited. Alternates may be selected if some facilities are closed or not available for a review.	MDA
	Office Review: MDA reviewer looks at policies as needed at this point.	Food service policy manual, plus any moot point documentation.	LHD
	MDA reviewer draws sample of plan review files to be reviewed.	Plan review log for review period. Need to be able to determine which reviews were received after beginning of review period and which have been completed through pre-opening evaluation.	LHD
			MDA
	LHD staff pull plans for review.	Plan review documents, including pre-opening evaluation and license application.	LHD
	MDA reviewer reviews plans.	List of establishment files to be reviewed.	
	LHD staff pull establishment files for review.	Establishment files.	
	MDA reviewer begins file review if time permits.		
2	Field: LHD staff accompanies MDA field reviewer.		
	Office: MDA reviewer starts or continues establishment file review.		MDA
	LHD pulls vending establishment files for review.	List of vending establishment files to be reviewed.	LHD
	MDA reviewer reviews files.	Vending establishment files.	

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3	Field: LHD staff accompanies MDA field reviewer. LHD staff pull establishment files for facilities visited. MDA reviewer begins file review for establishments visited.	Establishment files for facilities visited.	LHD
			LHD
	Office: MDA reviewer schedules exit interview.		
	LHD staff pulls temporary food services licenses.		LHD
	MDA reviewer selects sample and reviews selected temporary food service files.	Temporary food service licenses issued during review period, organized by year.	
			LHD
	MDA reviewer selects consumer and foodborne illness complaint sample.		
	LHD staff pull selected consumer and foodborne illness complaint files.	Consumer and foodborne illness complaint logs for review period.	
	MDA reviewer reviews selected consumer and foodborne illness complaint files.	Selected consumer and foodborne illness complaint files.	
			LHD
	MDA reviewer reviews limited licenses and variances, if any for review period.	Logs for limited licenses and variances. Files containing limited licenses and/or variances for review.	
			LHD
	MDA reviewer reviews training documentation for new staff assigned to the food program during the review period.	Training documentation for new staff. Supervisor endorsement documentation for new staff doing specialty foods.	

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4	Field: MDA reviewer completes file review for establishments visited. Reviewer summarizes results of field evaluation and prepares for exit interview.		LHD
	Office: MDA reviewer reads policies. MDA reviewer reviews documentation relating to important factors and interviews EH director regarding important factor related information. Program managers need to advise MDA reviewer which IF's the agency is not attempting to meet. MDA reviewer summarizes review information and prepares for exit interview.	Food service policy manual. Documentation showing how agency is meeting important factor standards. See documentation summary, MPR Guidance Document, Annex 8. Copies of various materials made for exit interview. Secretarial assistance usually needed.	LHD

*For a more complete description of documents needed, see, MPR Guidance Document, Annex 8 "Accreditation Review Document Summary."

NOTES: Multiple Offices- When an agency has food program files in multiple offices, all the various records that each office maintains would need to be made available during the visit. For example, during a partial day visit to an office in a district the following types of files are normally reviewed: plans, establishment files, vending files, complaint and foodborne illness files, temporary food service licenses, and employee training records.

The MDA reserves up to five days to conduct each review, in the event additional time is needed due to larger than normal sample sizes or delays. The MDA also increases the number of staff assigned to conduct reviews, if needed, to maintain a particular schedule.

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ANNEX 10- ADJUSTMENT OF MPR REVIEW PERIOD

The MDA's intent is to not review the same timeframe twice during different review cycles. Therefore, the review period for specific MPRs will be shortened if:
- That MPR had a follow-up during the previous cycle.
- That follow-up's review time frame overlapped into the next cycle's normal review period.

For example, if the follow-up review for MPR 6 was completed 10 months into the next review period, the on-site initial review will be reduced by 10 months for that specific MPR.

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Annex 11- Cycle 5 Food Program Review Options

Review Options
Compliance with program standards can be demonstrated in one of two ways.

Option 1 - MDA conducts the office and field review to determine compliance with the standards.

Option 2 - The local health department demonstrates how the agency is in compliance to the MDA auditor.

Option 2 Review Elements
The review shall consist of the following elements:

- Oral presentation / discussion outlining the food safety program's ongoing.
  a. quality assurance activities
  b. self-assessment against established program standards
- Self-assessment document review presented to the auditor by the agency staff to verify that the self-assessment was completed accurately and properly. Field assessment is demonstrated by the local health department's quality assurance program and will be reviewed by the auditors.
  a. The agency will receive the rating it gave itself on any MPRs, providing the audit verifies the rating as correct. Should an agency assess any indicator as:
     1. Not met or met with conditions.
     2. Puts a corrective action plan in place.
     3. Shows 90 days compliance with that plan by conducting another self-assessment of that indicator.
     4. Then the agency shall receive a met or met with conditions on that MPR.
  a. Should the self-assessment show an incorrect rating or a program element that was not properly or completely reviewed, that element shall be jointly reviewed with the MDA auditor and local health department staff to determine the correct rating.
  b. The auditor may review a number of the original documents assessed to determine if the self-assessment is correct and accurate.
- Field demonstration in agency-selected food establishments of the department's risk-based evaluation processes.
  a. The field demonstration shall consist of visiting food establishments of varying risk levels, providing 50% of the establishments visited are at the highest risk level.

# Inspectors per agency	Minimum # establishments visits per agency
1-4	2
5-10	4
11+	6

- Number of visits may be increased upon joint agreement between the auditor and the local health department management that an increased number of visits would provide a more accurate assessment. The MDA auditor may allow staff to conduct a practice evaluation, as time and need allows.
  a. Show demonstration of risk-based evaluations by a variety of program staff. When possible, each establishment visit must be with a different inspector. A maximum of one standardized trainer who is currently conducting routine inspections may be used.
  b. Demonstrate that risk factors present in the establishment are correctly identified.
  c. Demonstrate how the presence of those risk factors is communicated orally and in writing to the establishment and resolved.
  d. MPR 5: The rating determination shall be based upon:
     1. The oral discussion of field quality assurance activities.
     2. A review of the written quality assurance documentation, including frequency and use of risk based methodology. A field exercise demonstrating that food program inspectors are properly utilizing a risk–based evaluation methodology using the Field Evaluation Worksheet.

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How to Judge Compliance with MPRs 7 and 8 Using Review Option 2
- **Met** - Both of the following are done:
  - ○ Staff quality assurance field reviews are being conducted at a frequency in accordance Important Factor IV.
  - ○ Field exercise demonstrates that food program inspectors are properly utilizing a risk-based evaluation methodology.
- **Met with Conditions** - The conditions for a met are generally achieved; however, the field quality assurance frequency is below the standards and/or the field demonstration shows a moderate number of problems.
- **Not Met** - Field quality assurance reviews are not being done and/or significant problems were documented during the field demonstration.

Tips for Passing MPR's 7 and 8 Using Review Option 2
- Formally standardize evaluation staff.
- Agencies having only one food inspector should use a standardized trainer from another agency to conduct field quality assurance reviews.

The MDA may conduct additional surveys in agency regulated food establishments during the visit for statewide, risk-reduction survey purposes. These evaluations will not be used to determine whether any MPRs are met or not met. Results of these visits will be provided to the agency for consultative purposes.

Criteria to Qualify for Option 2
All local health departments are encouraged to utilize this review option. However, an agency best prepared to use this option has adequate program resources and is conducting thorough quality assurance program reviews. Agencies meeting all elements of part A and 80% of the elements of part B are automatically approved to use Option 2. Should an agency not meet the automatic approval criteria, the application must be submitted to the MDARD at least one year prior to their on-site visit for a case-by-case review.

Quality assurance may be accomplished through an agency specific plan, designed to meet agency needs. However, during the oral phase of the evaluation, the agency must be prepared to discuss the specific, substantive activities being carried out.

Part A:
- For automatic approval to use review Option 2, meet 100% of the following:
  a. Meet 90% of the food program MPRs during the agency's last accreditation review.
  b. Complete one or more documented program self-assessments covering the following time period:
     1. For agencies that did not use Option 2 during their previous review:
        a. Complete one or more self-assessments covering the first two years of the current review period (two-year total).
        b. Example: On-site review is scheduled for March 2011. Normal review period is March 2008-March 2011. Assessment(s) must be completed around March 2010 and cover March 2008-March 2010.
     2. For agencies that used Option 2 during their previous review:
        a. Complete one or more self-assessments covering the last year of the previous review period and the first two years of the current review period (three years total).
        b. Example: On-site review is scheduled for March 2012. Normal review period is March 2009-March 2012. Assessment(s) must be completed around March 2011 and cover March 2008-March 2011.
     3. Self-assessments must be completed approximately 12 months before the scheduled review date. This review shall be completed using the MDA Self-Assessment Guide (MPRs 7 and 8 do not need to be reviewed).
     4. Conduct quality assurance reviews of existing staff in field. (i.e. see Important Factor 4).

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Part B:

- For automatic approval to use review Option 2, meet 80% of the following applicable criteria (i.e.18 of 22, 17 of 21, 16 of 20, etc.). Only item numbers 15,16,18,19, and 20 may be considered not applicable due to their being no activity in that program area during the review period.

Program Advancement	
	1. Maintain at least one food program staff member that is MDARD standardized.
	2. Enroll in FDA Voluntary Retail Standards
	3. Maintain a tracking system to monitor risk factor occurrence in establishments; compare with state risk-reduction surveys and local historical records for the purpose of program improvement.
	4. Regularly utilize and document use of long-term control measures (i.e. such as risk control plans) with food establishments to assist in obtaining long-term compliance.
Plan Review	
	5. Conduct ongoing quality assurance on the following program area: **Plan reviews properly conducted and documented.**
	6. Conduct ongoing quality assurance on the following program area: **Pre-opening evaluations properly conducted and documented.**
	7. Conduct ongoing quality assurance on the following program area: **Unauthorized construction recognized and controlled.**
Evaluations	
	8. Conduct ongoing quality assurance on the following program area: **Evaluation frequency meets required schedules.**
	9. Conduct ongoing quality assurance on the following program area: **Follow-up evaluations meet required schedules.**
	10. Conduct ongoing quality assurance on the following program area: **Evaluation procedures meet MPR 4 requirements.**
	11. Conduct ongoing quality assurance on the following program area: **Vending machine location evaluations meet required schedules.**
	12. Conduct ongoing quality assurance on the following program area: **Temporary food service establishment evaluations properly conducted and documented.**
	13. Conduct ongoing quality assurance on the following program area: **Enforcement conducted per department policy.**
Miscellaneous	
	14. Conduct ongoing quality assurance on the following program area: **Records properly maintained and filed.**
	15. Conduct ongoing quality assurance on the following program area: **License limitations issued and documented per law.**
	16. Conduct ongoing quality assurance on the following program area: **Variances issued and documented per law.**
	17. Conduct ongoing quality assurance on the following program area: **Consumer complaint investigations (nonillness) properly conducted and documented.**
Training	
	18. Conduct ongoing quality assurance on the following program area: **Technical training for staff conducted per MPR 12 requirements.**
	19. Conduct ongoing quality assurance on the following program area: **Fixed food service evaluation skills for staff conducted per MPR 13 requirements.**
	20. Conduct ongoing quality assurance on the following program area: **Specialty food service evaluation skills conducted per MPR 14 requirements.**

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Foodborne Illness	
	21. Conduct ongoing quality assurance on the following program area: **Foodborne illness investigation conducted per MPR 15 requirements.**
	22. Conduct ongoing quality assurance on the following program area: **Foodborne illness investigations conducted per MPR 16 requirements.**

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Annex 12 - Cycle 6
Accreditation Review Option 2 Application

E-mail completed application to: dunleavys@michigan.gov when you have completed your self-assessment process. The self-assessment should be completed **1 year** before the agency's scheduled accreditation visit.

Agency Name:
Application completed by (name and title):
Phone:
E-Mail:
Date completed:

Our agency wishes to use review option 2 for our upcoming accreditation review.

Criteria to qualify for option 2:
All LHD's are encouraged to utilize this review option. However, an agency best prepared to use this option is conducting thorough quality assurance program reviews. Agencies meeting all elements of part A and 80% of the elements of part B are automatically approved to use option 2.

Should an agency not meet the automatic approval criteria, the application must be submitted to MDARD at least one year prior to their on-site visit for a case-by-case review.

Quality assurance may be accomplished through an agency specific plan, designed to meet agency needs. However, during the oral phase of the evaluation, the agency must be prepared to discuss the specific, substantive activities being carried out.

Part A: Mark all items as Met, Not Met (NM) or Not Applicable (NA).

MET NM	Meet 90% of the food program MPRs during the agency's last accreditation review.
MET Date(s) completed: _____ NM	Complete a documented program self-assessment covering the normal accreditation review period 12 months before the scheduled review date (time may be shortened during for some agencies during initial implementation period). This review shall be completed using the MDARD Self-Assessment Guide (MPR 5 does not need to be reviewed).
MET NM	Conduct quality assurance reviews of existing staff in field (i.e. FDA Voluntary Retail Standard 2 or Important Factor IV contain quality assurance guides).

Part B: Mark all items as Met, Not Met (NM) or Not Applicable (NA).

 For automatic approval to use review option 2 meet 80% of the following applicable criteria (i.e.18 of 22, 17 of 21, 16 of 20, etc.). Only item numbers 15,16,18,19 and 20 may be considered not applicable due to their being no activity in that program area during the review period.

Program Advancement	
MET NM	1. Maintain at least one food program agency staff member that is MDARD standardized.
MET NM	2. Enroll in FDA Voluntary Retail Standards
MET NM	3. Maintain a tracking system to monitor risk factor occurrence in establishments, compare with state risk-reduction surveys and local historical records for the purpose of program improvement.

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MET NM	4. Regularly utilize and document use of long term control measures (i.e. such as risk control plans) with food establishments to assist in obtaining long term compliance.
Plan Review	
MET NM	5. Conduct ongoing quality assurance on the following program area: **Plan reviews properly conducted and documented**
MET NM	6. Conduct ongoing quality assurance on the following program area: **Pre-opening evaluations properly conducted and documented**
MET NM	7. Conduct ongoing quality assurance on the following program area: **Unauthorized construction recognized and controlled**
Evaluations	
MET NM	8. Conduct ongoing quality assurance on the following program area: **Evaluation frequency meets required schedules**
MET NM	9. Conduct ongoing quality assurance on the following program area: **Follow-up evaluations meet required schedules**
MET NM	10. Conduct ongoing quality assurance on the following program area: **Evaluation procedures meet MPR 4 requirements**
MET NM	11. Conduct ongoing quality assurance on the following program area: **Vending machine location evaluations meet required schedules**
MET NM	12. Conduct ongoing quality assurance on the following program area: **Temporary food service establishment evaluations properly conducted and documented**
MET NM	13. Conduct ongoing quality assurance on the following program area: **Enforcement conducted per department policy**
Miscellaneous	
MET NM	14. Conduct ongoing quality assurance on the following program area: **Records properly maintained and filed**
MET NM NA	15. Conduct ongoing quality assurance on the following program area: **License limitations issued and documented per law**
MET NM NA	16. Conduct ongoing quality assurance on the following program area: **Variances issued and documented per law**
MET NM	17. Conduct ongoing quality assurance on the following program area: **Consumer complaint investigations (non-illness) properly conducted and documented**
Training	
MET NM NA	18. Conduct ongoing quality assurance on the following program area: **Technical training for staff conducted per MPR 12 requirements**
MET NM NA	19. Conduct ongoing quality assurance on the following program area: **Fixed food service evaluation skills for staff conducted per MPR 13 requirements**
MET NM NA	20. Conduct ongoing quality assurance on the following program area: **Specialty food service evaluation skills conducted per MPR 14 requirements**
Foodborne Illness	
MET NM	21. Conduct ongoing quality assurance on the following program area: **Foodborne illness investigation conducted per MPR 15 requirements**
MET NM	22. Conduct ongoing quality assurance on the following program area: **Foodborne illness investigations conducted per MPR 16 requirements**

Agency Comments (Additional brief documents may be attached, if desired):

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Annex 13- Report Marking Instructions for Option 2 Field Evaluation Worksheets (2005 Food Code, Annex 5, Part 4 (A-H) References)

Review

The accreditation process for field evaluations for Cycle 5, Option 2, will be based on the local health department evaluator's knowledge, skills, and abilities; not on the condition of the food service establishment. The Field Evaluation Worksheet, in combination with a review of existing quality assurance documentation, will be used to judge MPR 5. For this document, the evaluator is the local health department, food service inspector; and the auditor is the MDA, food service specialist conducting the accreditation.

The evaluator must demonstrate knowledge of foodborne illness risk factors and interventions along with good retail practices (GRPs).

Communication

The Field Evaluation Worksheet along with the risk-based inspection process evaluated during Cycle 5 Accreditation, Option 2, stresses open communication between the evaluator and operator. To be an effective communicator, the evaluator is expected to ask questions relative to the flow of food through the establishment, preparation and cooking procedures, employee health, and normal everyday operation of the facility (i.e., GRPs). Response statements made by the person in charge (PIC) or food employees should be used to support or augment direct observations. When observations are made while a food is undergoing a process (i.e., cooling and reheating), the evaluator should ask the PIC or food employees questions to support the actual observations and determine Food Code/Food Law compliance.

Option 2 field exercises focus on an audit of the evaluator, not the establishment.
There are some differences in the accreditation process when choosing Option 2 that must be discussed and understood, prior to the accreditation exercise, by the auditor and the evaluator. These include the following:

- There will be no interaction, guidance or training from the MDA auditor to the food service evaluator during the audit. It is expected that the evaluator will verbally address all findings of either compliance or noncompliance throughout the entire accreditation exercise. **Communication** is the only way for the auditor to know what the evaluator is seeing, and how compliance is determined.
- At the end of the accreditation exercise the evaluator will be given time to look over their notes, check sheets, or any other guidance form that they use for the evaluation to ensure they have completed the inspection. Any additional information obtained by the evaluator, prior to leaving the facility, may be communicated to the auditor.
- Once the auditor and evaluator leave the facility, the accreditation exercise is over. No changes may be made to the auditor's report.
- To maintain consistency throughout the process, there will be no feedback given from the auditor to the evaluator after the accreditation exercise. On the same note, there will be no feedback given from the auditor to the Environmental Health Director or Food Supervisor until all accreditation exercises are complete, and compliance with MPR 5 is determined.

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GUIDELINES FOR DETERMINING EVALUATOR COMPETENCY

YES/NO

Due to the nature of the accreditation exercise, the evaluator is being reviewed, not the establishment or PIC. The evaluator's knowledge is demonstrated by both direct observations and supportive questioning.

- To mark a YES under Competency Demonstrated:
  a. The evaluator must verify risk factors, interventions, and GRPs not only by observation, but also through questions asked about procedures, practices, and monitoring.
- A Competency Demonstrated will be marked as NO if:
  a. An observation is missed by the evaluator (i.e., no cooking temperatures were taken of food cooked and served during the accreditation exercise).
  b. The procedure is not being performed at the time of the evaluation and no line of
  c. questioning is conducted to determine compliance (i.e., reheating is performed by the food service establishment but not during the evaluation and questions on procedures for reheating are not asked by the evaluator).
  d. The procedure is being performed at time of the evaluation and observed as a possible violation, but the candidate does not determine the root cause in order to verify which Food Code section to cite.

No Opportunity to Demonstrate Competency

No opportunity to demonstrate competency during the accreditation process will only be marked if the establishment never performs the procedure or process. For instance, if the food service establishment is only a cook-serve establishment, processes such as hot-holding, cooling, and reheating for hot-holding are not performed; therefore, these items would be marked as No Opportunity to Demonstrate Competency.

Field Evaluation Worksheet Competency Guidelines

The following guidance may be used to determine the evaluator's competency in each of the categories listed below.

II. Inspections, Observations, and Performance

(C) Risk Based Inspection/Active Managerial Control
1. **Verified demonstration of knowledge of the person in charge.**
   - For the evaluator to be marked YES in this category the following items must be evaluated:
     a. PIC present.
   - Determine presence of PIC:
     a. the person responsible for monitoring and managing shall be immediately available and knowledgeable in operational procedures and Food Code/Food Law requirements.
     b. Demonstration of knowledge.
   - Determine that the PIC meets at least one of these three criteria:
     a. Certification by an ACCREDITED PROGRAM per §2-102.20.
     b. Compliance with the Code and Law by having no violations of critical items during the current inspection.
     c. Correct responses to the inspector's questions regarding public health practices and principles applicable to the operation.

NOTE: In lieu of a certification, the evaluator should assess the PIC's knowledge by asking open-ended questions that would evaluate the PIC's knowledge in each of the areas enumerated in §2-102.11(C). Questions can be asked during the initial interview, menu review, or throughout the inspection as appropriate. The evaluator should ask a sufficient number of questions to enable the evaluator to make an informed decision concerning the PIC's knowledge of the code requirements and public health principles as they apply to the operation.

   - PIC duties.
     a. Determine if the PIC is ensuring that employees are complying with the duties listed in §2-103.11.

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NOTE: Since marking this item out of compliance requires judgment by the evaluator, it is important that this item not be marked for an isolated incident, but rather for an overall evaluation of the PIC's ability to ensure compliance with the duties described in §2-103.11.

2. **Verified the restriction or exclusion of ill employees.**
   - In order for the evaluator to be marked YES in this category the following items must be evaluated: Whether or not the PIC…
     a. Is aware of the requirement for employees to report specific symptoms and diagnosed illnesses, and knows what the symptoms and illnesses are (i.e., having it posted-§2-201.11).
     b. Can convey knowledge of an employee health policy or have access to an employee health policy (written not required), and identify what actions are necessary when an employee does report symptom or diagnosed illness, (§2-201.12).
     c. Is aware of requirements covering an employee returning to work (§2-201.13).

NOTE: The policy must reflect the current Food Code provisions. Verbal communication of the employee health policy must be specific to the types of illnesses and symptoms that require reporting. Nonspecific statements such as "sick or ill employees are not allowed to work," do not fully address the employee illness requirements of §2-201.12. Further questioning would be warranted.

3. **Verified the availability of a consumer advisory for foods of animal origin served raw or undercooked.**
   - In order for the evaluator to be marked YES in this category the following items must be evaluated:
     a. Determine whether raw or undercooked foods are served or sold routinely or seasonally.
     b. Determine that a consumer advisory with a disclosure and reminder is present as specified under § 3-603.11 of the Food Code or as stated in the Michigan Food Law 2000, as amended.

4. **Verified approved food sources (e.g., food from regulated food processing plants; shellfish documentation; wild game and mushrooms, game animal processing; parasite destruction for certain species of fish intended for raw consumption; receiving temperatures).**
   - In order for the evaluator to be marked YES in this category the following items must be evaluated:
     a. All foods are from a regulated food processing plant or other approved source (no home prepared items).
     b. Foods are received at proper temperatures, protected from contamination during transportation, and received safe and unadulterated.
     c. Determine if any specialty food items are served or specialty processing is done (i.e., wild game or mushrooms, game animal processing, and parasite destruction).

NOTE: Include questions on segregation of distressed products, temperature monitoring, and how receiving procedures meet Food Code requirements.

5. **Verified cooking temperatures to destroy bacteria and parasites.**
   - In order for the evaluator to be marked YES in this category the following items must be evaluated:
     a. Every effort should be made to assess the cooking temperatures of a variety of products served in the food establishment.
     b. Determine if PIC and employees know and are following proper cooking time and temperature parameters (include microwave cooking requirements).
     c. The presence of required thermometers and their proper use should be assessed.

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NOTE: The evaluator should involve the PIC and/or employees in this verification process in order to determine compliance with cooking time/temperature requirements (i.e., having the PIC take the temperatures). Observations need to be supported by proper questioning.

6. **Verified reheating temperatures of TCS food for hot holding.**
   - In order for the evaluator to be marked YES in this category the following items must be evaluated:
     a. Which foods are reheated for hot holding.
     b. How reheating is done (include reheating in microwave) and if employee and PIC are knowledgeable of required parameters.
     c. Temperature of foods being reheated when possible.

NOTE: If items are found "reheating" on the steam table, further inquiry is needed to assess whether the equipment in question is capable of reheating the food to the proper temperature within the maximum time limit. If an operation does not reheat for hot holding, then this category would be marked as No Opportunity to Demonstrate Competency.

7. **Verified cooling temperatures of TCS food to prevent the outgrowth of spore-forming or toxin-forming bacteria.**
   - In order for the evaluator to be marked YES in this category the following items must be evaluated:
     a. Determine types of foods that are cooled.
     b. Determine procedures for meeting required cooling parameters.
     c. Determine if procedures are being followed (i.e., methods and monitoring) and employee's and PIC's knowledge of cooling requirements.
     d. Verify food temperatures when possible.

NOTE: Problems with cooling can often be discovered through inquiry alone. Even when no cooling is taking place, inspectors should ask food employees and managers questions about the cooling procedures in place. Due to the time parameters involved in cooling, inspectors should always inquire at the beginning of the inspection if there are any products currently being cooled. This provides an opportunity to take initial temperatures of the products and still have time to recheck temperatures later in the inspection in order to verify that critical limits are being met. Information gained from food employees and management, in combination with temperature measurements taken, should form the basis for assessing compliance of cooling during an inspection.

8. **Verified cold holding temperatures of foods requiring time/temperature control for safety (TCS food), or when necessary, verified that procedures are in place to use time alone to control bacterial growth and toxin production.**
   - In order for the evaluator to be marked YES in this category the following items must be evaluated:
     a. Determine compliance by taking food temperatures in multiple cold holding units.
     b. Evaluate operational procedures that are in place to maintain cold holding requirements (i.e., monitoring of food temperatures, and the ambient temperatures of equipment, by the operator).
     c. If time alone is used, review written policy and determine that policy meets requirements of the Food Code and is being followed.

9. **Verified hot holding temperatures of TCS food or when necessary, that procedures were in place to use time alone to prevent the outgrowth of spore-forming bacteria.**
   a. In order for the evaluator to be marked YES in this category the following items must be evaluated:
     a. Determine compliance by taking food temperatures in multiple hot holding units.
     b. Evaluate operational procedures that are in place to maintain hot holding requirements (i.e., monitoring of food temperatures, and the ambient temperatures of equipment, by the operator).
     c. If time alone is used, review written policy, determine that policy meets requirements, and is being followed.

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10. **Verified date marking of ready-to-eat foods TCS food held for more than 24 hours.**
    - In order for the evaluator to be marked YES in this category the following items must be evaluated:
        a. Determine those foods requiring date marking.
        b. Evaluate whether the system in place to control for L. monocytogenes meets the intent of the Food Code and is being followed.

NOTE: With exceptions, all ready-to-eat, potentially hazardous foods (TCS foods) prepared on-site and held for more than 24 hours should be date marked to indicate the day or date by which the food need to be served or discarded.

11. **Verified food safety practices for preventing cross-contamination of ready-to-eat food.**
    - In order for the evaluator to be marked YES in this category the following items must be evaluated:
        a. Determine proper separation of raw animal foods and ready-to-eat foods from each other by cooking temperature.
        b. Evaluate practices to eliminate the potential for contamination of utensils, equipment, and single-service items by environmental contaminants, employees, and consumers.
        c. Evaluate food storage areas for proper storage, separation, segregation, and protection from contamination.

12. **Verified food contact surfaces are clean and sanitized, protected from contamination from soiled cutting boards, utensils, aprons, etc., or raw animal foods.**
    - In order for the evaluator to be marked YES in this category the following items must be evaluated:
        a. Evaluate food-contact surfaces of equipment and utensils to verify that these are maintained, cleaned, and sanitized.
        b. Assess how utensils and cookware are washed, rinsed, and sanitized.
        c. Evaluate type of sanitizer, concentration, proper use, and use of chemical test strips.

13. **Verified employee hand washing (including facility availability).**
    - In order for the evaluator to be marked YES in this category the following items must be evaluated:
        a. Evaluate proper hand washing method, including appropriate times.
        b. Evaluate location, accessibility, and cleanliness of hand wash sinks.

14. **Verified good hygienic practices (i.e., eating, drinking, tasting, sneezing, coughing, or runny nose; no work with food/utensils).**
    - In order for the evaluator to be marked YES in this category the following items must be evaluated:
        a. Evaluate policy for handling employees with sneezing, coughing, or runny nose.
        b. Evaluate availability and use of employee break area (where employees eat, drink, or smoke).
        c. Evaluate use of hair restraints.

15. **Verified no bare hand contact with ready-to-eat foods (or use of a pre-approved, alternative procedure).**
    - In order for the evaluator to be marked YES in this category the following items must be evaluated:
        a. Evaluate operation's policy for handling ready-to-eat foods.
        b. Evaluate employee practices of handling ready-to-eat foods.
        c. Evaluate alternative procedure for bare hand contact if applicable (i.e., review policy, question employees about the use of the policy, and determine proper use of policy).

16. **Verified proper use, storage, and labeling of chemicals; sulfites.**
    - In order for the evaluator to be marked YES in this category the following items must be evaluated:
        a. Evaluate proper storage and labeling of chemicals.
        b. Evaluate if chemicals are approved for use in food establishment (include drying agents, veggie/fruit chemical wash, food coloring, sulfite agents, insecticides, and pesticides).
        c. Evaluate proper use of chemicals.

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17. **Identified food processes and/or procedures that require an HACCP Plan per the jurisdiction's regulations.**
    - In order for the evaluator to be marked YES in this category the following items must be evaluated:
        a. Determine if any process or procedure requires a HACCP plan.
        b. Review the written HACCP policy (as stated in the Food Code §8-201.14).
        c. Evaluate appropriateness, effectiveness, and implementation of the plan.

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(E) Good Retail Practices

GRPs are the foundation of a successful food safety management system. GRPs found to be out-of-compliance may give rise to conditions that may lead to foodborne illness (e.g., sewage backing up in the kitchen). To effectively demonstrate knowledge of certain risk factors, the evaluator must also address related GRPs (i.e., when evaluating if food contact surfaces are clean and sanitized, test kits would be part of the assessment of the ware washing process).

The evaluator is being audited on their overall assessment of GRPs by using observations and/or questions.
- In order for the Evaluator to be marked YES in this category the following items must be evaluated:
    a. Evaluate the protection of products from contamination by biological, chemical, and physical food safety hazards.
    b. Evaluate control of bacterial growth that can result from temperature abuse during storage.
    c. Evaluate the maintenance of equipment, especially equipment used to maintain product temperatures.

NOTE: Examples of concerns addressed by the basic operation and sanitation programs include the following:
- Pest control
- Food protection (non-critical)
- Equipment maintenance
- Water
- Plumbing
- Toilet facilities
- Sewage
- Garbage and refuse disposal
- Physical facilities
- Personnel

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