**Food Protection**

**Capacity Assessment Review Findings**

In the fall of 2022, the Office of Local and Regional Health conducted a Capacity Assessment of local health departments in Massachusetts to evaluate local public health's current ability to provide basic public health services based on their available resources, including staffing levels, funding, and training. The first-ever Massachusetts Local Public Health Performance Standards, which defined basic levels of services and workforce credentials and training, framed the assessment. As part of this assessment, a qualitative review of documentation submitted by municipalities was conducted, focusing on various subject areas to evaluate the implementation of crucial public health services.

The food protection documents included: food establishment and school inspections and follow-up, a HACCP plan and associated inspections/follow-up, food plan reviews, a variance review, and frozen dessert manufacturer lab results (3 months).

# Capacity Assessment Key Findings

## **1. Standardization and Consistency of Inspections**

High-quality food protection inspections require standardized inspection procedures and forms.

* Complete documents should include the inspector's name, the name of the person in charge of the establishment during the inspection, date and time in and out.
* Inspections should occur every six months under the food code.
* The inspection report should document that all aspects of food safety have been inspected, including but not limited to food preparation, storage, equipment working properly, and knowledge of the staff in charge. A thorough report should also include what was discussed with management about the inspection.

## **2. Verification of Violations Being Corrected**

A recurring area for improvement observed in inspection reports was the absence of follow-up or verification to ensure the violations were corrected.

* Many inspections indicated a need for follow-through from the Health Departments. The inspector must rectify documented critical violations and follow up with the food establishment.
* Reinspections should be documented on a separate inspection report to ensure thoroughness, not just noted on the original inspection report where a violation was noted.

## **3. Increased Technical Training**

Improving inspector skills requires training in various technical areas.

* There is an opportunity for additional training on issuing and reviewing food variances (e.g., acidification of rice), reviewing new food establishments before issuing food permits (including what information to ask for and how to review them, like food menus, floor plans, etc.), and how to inspect food establishments with variances.
* Accessible training materials, standard checklists (e.g., what to look for when inspecting a restaurant with sushi or what to ask the establishment to submit when reviewing a food plan), and mentorship can further enhance their inspection proficiency.

## **4. Shifting from Paper to Electronic Forms**

Electronic forms were highlighted as being especially effective for food inspections.

* Electronic inspections are more thorough and accurate because there is the ability to track repeat violations for the inspector to refer to during the inspection.
* Electronic forms offer prompts to inspectors to ensure necessary investigations or information are included (e.g., a prompt that asks for food temperature).
* Most electronic forms also allow you to easily attach photos of violations to help better document your findings and to allow food establishment owners and managers to understand the concerns fully.

High-quality food protection inspections should include essential details such as the inspector's name, the establishment's responsible person, and the date and time of inspection. These inspections should comprehensively cover aspects of food safety, with thorough documentation of areas inspected, discussions with management, and a specific focus on follow-up actions for identified violations. To enhance inspector proficiency, training programs could address technical areas such as issuing and reviewing food variances, evaluating new food service establishment plans, and conducting inspections for establishments with variances.

# Qualitative Findings

The lists below outline the reasons each type of food protection document did not meet the proficiency standard. The most frequently selected determinations are bolded ~~in red~~ and ordered by frequency from greatest to least. **The most significant issue for food protection overall was that two inspections per year were not submitted and were required.**

## Backup Documentation Results

For food establishment and school inspections, 1,948 documents were requested. Of those, 1,413 (73%) were submitted, and of those submitted, 554 (39%) were deemed proficient.

For food plan reviews, 348 documents were requested. Of those, 186 (53%) were submitted, and of those submitted, 94 (51%) were deemed proficient.

For HACCP plans, 263 documents were requested. Of those, 187 (71%) were submitted, and of those submitted, 61 (33%) were deemed proficient.

For frozen dessert manufacturers, 209 documents were requested. Of those, 120 (57%) were submitted, and of those submitted, 103 (86%) were deemed proficient.

For variance reviews, 161 documents were requested. Of those, 71 (44%) were submitted, and of those submitted, 61 (86%) were deemed proficient.

## Food Establishments 1/2/3 and Schools 1/2 Documents Evaluation Criteria

1. **2 inspections per year were not submitted and required**
2. **Reinspection not completed or documented**
3. Follow-up action not completed or documented
4. Critical fields not completed
5. Form insufficient or not approved
6. Conditions that may put consumers at risk not properly addressed
7. Conditions that may contribute to a foodborne illness outbreak not properly addressed

## Variance Review 1/2 Documents Evaluation Criteria

1. Form insufficient
2. Conditions that may put consumers at risk not properly addressed
3. Conditions that may contribute to a foodborne illness outbreak not properly addressed
4. Critical fields not completed
5. Follow-up action not completed or documented
6. Reinspection not completed or documented

## HACCP Plan 2018/19/21 Documents Evaluation Criteria

1. **Appropriate HACCP Plan was not included for at least 1 of the 3 years requested**
2. **2 inspections per year were not submitted and required**
3. **Conditions that may put consumers at risk not properly addressed**
4. Critical fields not completed
5. Follow-up action not completed or documented
6. Reinspection not completed or documented
7. HACCP Plan does not accurately protect critical control points
8. Conditions that may contribute to a foodborne illness outbreak not properly addressed
9. Form insufficient or not approved

## Frozen Dessert Manufacturer June/July/August Documents Evaluation Criteria

1. **Follow-up action not completed or documented**
2. Conditions that may put consumers at risk not properly addressed
3. Critical fields not completed
4. Form insufficient or not approved
5. Conditions that may contribute to a foodborne illness outbreak not properly addressed
6. Reinspection not completed or documented

## Food Plan Review 1/2 Documents Evaluation Criteria

1. **Critical fields not completed**
2. Follow-up action not completed or documented
3. Form insufficient or not approved
4. Conditions that may put consumers at risk not properly addressed
5. Conditions that may contribute to a foodborne illness outbreak not properly addressed