



## Secure Remote Document Review Application Overview and Considerations

**Background:** The review of food safety plans, hazard analyses, preventive controls and other critical operational documents and records are part of any routine and focused / for cause inspection. These documents often contain trade secrets and confidential business information and must be handled in a secure manner to prevent sensitive information from being disclosed. Since the inception of preventive controls inspections, the time investigative staff spend in a regulated facility, and more specifically the time associated with the review of procedures, food safety plans, and documentation has grown substantially. The use of this solution could potentially reduce state on-site inspectional time, travel costs due to multiple return trips to the facility, and per diem costs for overnight stays necessary to complete distant inspections. The COVID-19 pandemic has also created new challenges as regulatory programs have had to evaluate how inspections are conducted and look for ways to limit or reduce exposures for both the regulatory staff and the firm's personnel. Establishing a mechanism to allow for secure, remote document review will help reduce the time spent in the facility with plant personnel, while still allowing for an effective review of the operation.

**SecureDoc:** The SecureDoc site has been developed to allow for the secure, remote review of documents that must be reviewed and evaluated for compliance as part of inspectional processes or focused remote regulatory assessments. The SecureDoc site is accessed similarly to the way regulatory programs currently access FoodShield, and does not require any software or downloads to the agency's servers or networks. As a stand-alone system that allows secure document review, it will also not interact or interface with any state or federal inventory database systems. The application is designed to allow the regulated firm to upload procedures and documents requested by the regulatory agency to a secure government cloud that utilizes federal-level encryption and compliance standards. The system supports most data and picture file formats, such as .pdf, .doc, .xls, .jpg, .bmp, etc.. The firm can establish controls over the document that will:

- Limit who can access the document, by only sending the link to the files to the specific individuals authorized to review the documents;
- Create a password requirement to access the files and allow the user to send the password through a text or separate e-mail to prevent interception with the link to the files;
- Set an expiration date when the file(s) will no longer be available;
- Set a policy that the files will be deleted from the server and the disk wiped on a date set by the firm, to prevent any additional access to or recovery of the files;
- Limit the number of times the authorized individual can access the document for review before being blocked from further access;
- Restrict the ability to print, copy, or download any of the documents uploaded to the site.



**Procedural Considerations for Regulatory Program Use:** It is important to understand your statutory and regulatory authority to access records and documents from the regulated industry. Most state laws do not specify that the records an agency is authorized to review must be provided in an electronic format, therefore, requests for companies to provide procedures and documentation through SecureDoc should be considered voluntary, and firms opting not to participate should not be penalized.

It is important to provide a framework for the use of the SecureDoc software by the program so that it is used consistently by all personnel. Industry will have an expectation that regulators will use this tool judiciously and take the necessary steps to protect the documents that they are reviewing from unauthorized access. Programs should also establish a standard document review time-frame that focuses on providing sufficient time for staff to review the documents, without maintaining them on the system for extended periods of time. Allowing 2-3 weeks for review of the materials should be sufficient in most cases. AFDO has developed a model Standard Operating Procedure (SOP) that regulatory programs can adapt to their programmatic needs. The model SOP is available on the AFDO website and covers use of the application, communication with the firm, and basic regulatory program personnel expectations.