



Risk Based Inspections/Standard 3 Experiences

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Health

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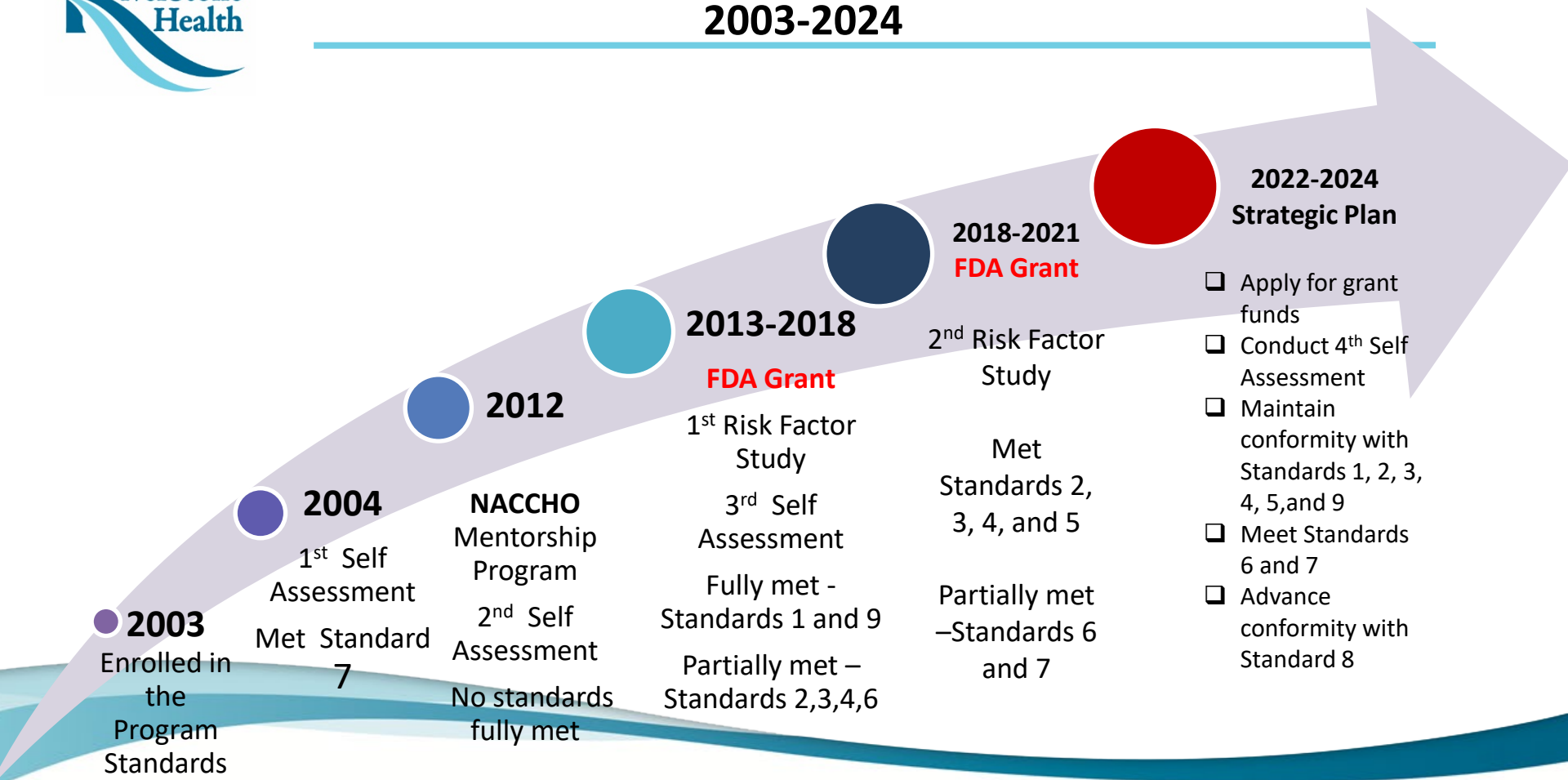
Billings, Montana





Retail Program Standards at RiverStone Health

2003-2024





Strategies for Completing Standard 3

1. Go for the funding
 - FDA Grants, AFDO, etc.
 - Plan and Accountability
2. Leverage Resources
 - Don't reinvent the wheel
 - Use your Retail Food Specialist
3. Integrate into Performance Management and QI
4. Get buy-in from your organization and staff



Standard 3 Work Plan

STANDARD 3 – INSPECTIONS BASED ON HACCP		
Review variance policy by Nov 10, 2017	<i>Met – Completed 9/19/2017</i>	Clark
Develop written verification and validation policies by Nov 10, 2017	<i>Met – Completed 11/20/2017</i>	Clark and workgroup
Complete HACCP application documents	<i>Met – Completed 9/26/2017</i>	Clark And workgroup
Complete self-assessment of Standard 3 by Nov 30, 2017	<i>Met – Completed 11/29/2017</i>	Clark and Marilyn
Request verification audit by Dec 1, 2017	<i>Met – Completed, requested 11/29/2017. Audit and verification was conducted by Flathead County. Standard 3 audit was complete on 1/10/2018. Standard 3 is fully met.</i>	Clark and Flathead County

Standard 3 Impacts

1. On-site Corrective Action policy
2. Variance Request Policy
3. Policy for verification and validation of HACCP plans, when a HACCP plan is required.



Standard 3 Impacts: COS Policy

- Created for out of compliant risk factors
- Guideline for inspectors
- Must obtain corrective action before completing inspection
- Assessing Compliance and COS for holding temperatures.
- Best Practices

RIVERSTONE HEALTH BILLINGS, MT	
DIVISION: PUBLIC HEALTH	ORIGINATION DATE: OCT 17, 2016
PROGRAM: FOOD PROTECTIONS	LATEST REVISION:
SERVICE: ENVIRONMENTAL HEALTH	<input type="checkbox"/> POLICY <input type="checkbox"/> PROCEDURE <input checked="" type="checkbox"/> GUIDELINE <input type="checkbox"/> STANDING ORDER
TITLE: ON-SITE CORRECTIVE ACTION	
APPROVAL:	

Background

It is essential to consumer protection and to regulatory credibility for immediate corrective actions to be obtained for any out of control foodborne illness risk factors before completing the inspection and leaving the food establishment. Obtaining immediate corrective actions conveys the seriousness of the violation to management. Failure to require immediate corrective actions when an out of control risk factor has been identified implies that the risk factor has little importance to food safety.

Purpose

This document is intended to be a guideline to determine when and what corrective actions may need to be taken to prevent a possible foodborne illness due to the lack of compliance with risk factors. On-site correction must be obtained by the person in charge for any out-of-control foodborne illness risk factors before the inspector completes the food service establishment inspection.

Marking Instructions and Follow-Up Inspections

During an inspection if immediate corrective action is taken by the establishment to correct a risk factor violation. The violation should be marked "Corrected On-Site" (COS) and the action taken should be noted in the Observations and Corrective Actions text box. It's up to the inspector to assess whether or not a follow-up is required if the violation was corrected onsite. Just because an establishment takes immediate corrective action during inspection doesn't mean there will be long-term control. General factors to consider when assessing if a follow-up is needed are: does the establishment have active managerial control in place; does the establishment have a history of non-compliance with the same risk factor; history with the operator; was the immediate corrective action a shot term fix (dishwasher or cooler not working).


Suggested Immediate Corrective Actions

Risk Factor	Immediate Corrective Action
Handwashing <ul style="list-style-type: none">Food employee observed not washing hands at appropriate time	<ul style="list-style-type: none">Employee must be instructed to wash hands immediately including where and when to wash hands.
Bare Hand Contact with RTE Food <ul style="list-style-type: none">Ready-to-eat food is handled with bare hands	<ul style="list-style-type: none">Discard if touched and advise employee how to handle ready-to-eat food with tongs, gloves, utensils, etc.
Approved Source/Sound Condition <ul style="list-style-type: none">Food from unapproved source/unsound condition – cross contamination of RTE foods with raw animal foods.	<ul style="list-style-type: none">Discard/Reject/Return
Food received at proper temperature <ul style="list-style-type: none">Potentially hazardous foods received above 41°FFood labeled frozen is thawedRaw eggs received in an ambient temperature above 45°F	<ul style="list-style-type: none">Discard/Reject/Return
Food separated and protected <ul style="list-style-type: none">Raw animal foods stored improperly with RTE foodsRaw animal foods improperly stored	<ul style="list-style-type: none">Immediately relocate food items to minimize riskImmediately relocate food items to minimize risk
Cooking <ul style="list-style-type: none">Potentially hazardous food is undercooked	<ul style="list-style-type: none">Continue cooking to proper temperature
Reheating for Hot Holding <ul style="list-style-type: none">Potentially hazardous food is improperly reheated	<ul style="list-style-type: none">Use reheating method to achieve 165°F immediately
Cold Holding & Hot Holding <ul style="list-style-type: none">Potentially hazardous food held above 41°F or below 135°F	<ul style="list-style-type: none">Refer to "Assessing Compliance With Temperature Holding Requirements"



Standard 3 Impacts: Variance Request/HACCP Plan Review Policy

- Establishes a step-by-step process
- Increased variances and HACCP Reviews
- Staff have more confidence
- Review committee is formed.
- Committee makes a recommendation to Board of Health.

RIVERSTONE HEALTH BILLINGS, MT	
DIVISION: ENVIRONMENTAL HEALTH SERVICES	ORIGINATION DATE: SEPT 19, 2017
PROGRAM: FOOD PROTECTION PROGRAM	LATEST REVISION: 11/20/2017
SERVICE: RETAIL FOOD	POLICY <input checked="" type="checkbox"/> PROCEDURE GUIDELINE <input type="checkbox"/> STANDING ORDER
TITLE: VARIANCE REQUEST/ HACCP PLAN REVIEW & FIELD VERIFICATION	
APPROVAL: 	

PURPOSE:

The purpose of this document is to establish step-by-step written procedures for sanitarians to address variance requests and to review and verify HACCP plans.

BACKGROUND:

Section 3-502.11 of the 2013 FDA Food Code requires that a food establishment obtain a variance from RiverStone Health before engaging in certain specialized processes. Special food processes pose an increased risk for foodborne illness if not conducted under strict operational procedures. These processes may require the person in charge and food employees to use specialized equipment and demonstrate specific competencies. The variance requirement is designed to ensure that the special process is carried out safely.

Before a variance can be approved, a Hazard Analysis Critical Control Point (HACCP) plan must be developed and approved. A HACCP plan is a common sense technique to control food safety hazards. It is a preventive system of hazard control rather than a reactive one. Food establishments can use a HACCP plan to ensure the preparation of safe food. It is not a zero risk system, but is designed to minimize the occurrence of risk factors associated with foodborne illness.

PROCEDURES:

- I. **Determining need for a Variance and/or HACCP Plan** - It is the responsibility of the sanitarian during the course of plan review or a routine inspection of food establishments to determine if specialized processing methods are being conducted and if a Variance and/or HACCP plan is required by the Food Code.
 - A. Establishments must apply for a Variance and/or submit a HACCP plan during the plan review process and shall not proceed with special processing activities until the variance and/or HACCP plan is approved.

Standard 3: Sustaining Conformance

- Review policies and guidelines annually
- Audit Completeness of Inspection Reports – COS criteria
- Implement Quality Improvement Projects.
 - Trainings, tools, etc.
- Keep your staff involved.

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Program	Individual Metrics	Program Metrics	Outcomes
Food Protection Process/Operations	80% of routine inspection reports completed by each FSIO meet the following conditions: <ul style="list-style-type: none"> • Items 1-27 marked correctly, • Violation COS and documented, • Correct ARM cited, • PWS # recorded, • CFPM, Vomit & diarrhea and illness policies documented, • Timeframe specified for correction of each violation 	80% of routine inspections reports will have accurate and complete documentation	Consistent interpretation and application of laws, regulations, policies and procedures. Standard 3

