

SECTION L STANDARDIZATION

I. GEORGIA STANDARDIZATION PROCEDURE:

A. Background:

- 1. A state audit of the Georgia food service program in 2001 observed inconsistencies among counties in the violations recorded, scoring, routine and follow-up inspections and frequency of inspections. Even though there was one state code, there were many differences in how it was being enforced.
- 2. Even as the audit was being conducted, the General Sanitation Committee had already begun work on revising Georgia's food service rules. This committee developed Georgia's rules with the primary objectives of providing scientifically sound requirements for food service establishments, standardization among counties and better enforcement tools. After the rules were formulated, adopted and rescinded, the Georgia Food Code Committee made two more revisions before the final document was adopted.
- 3. The state audit reinforced the need for standardization among Environmental Health Specialists (EHS) who inspect food service establishments. Chapter 290-5-14-.09 requires that all Environmental Health Specialists successfully complete an exam accredited by the Conference for Food Protection (CFP) and be standardized in food safety inspection techniques.

B. Introduction:

1. The main goal of Georgia's food safety program is the reduction and prevention of foodborne illness. Standardization procedures are modeled after the "FDA Procedures for Standardization and Certification of Retail Inspection/Training Officers." Standardization procedures are based on provisions in the Georgia "Rules and Regulations for Food Service, Chapter 290-5-14 which is based on the 2005 FDA Model Food Code. The procedures are focused on foodborne illness risk factors, public health interventions, and application of the principles of Hazard Analysis Critical Control Point (HACCP).

C. Purpose:

1. Through the application of the procedure, the candidate will demonstrate knowledge and expertise in the understanding, application, and interpretation of Chapter 290-5-14, foodborne illness risk factors, public health interventions, and

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HACCP principles; and in the use of essential inspection equipment; and will exhibit necessary communication skills in conducting a food service establishment inspection. This procedure is not intended to provide basic training to individual candidates. The candidate shall meet all the requirements of the procedure in order to be standardized. This document describes the qualifications required of the candidate, the field requirements, and the communication requirements necessary to convey the purpose and the findings of the inspection.

D. Scope:

- 1. The procedures in Section L Part-I describe the process used by the Standard-Trainer in standardizing qualified food safety inspection personnel in food service establishment inspection techniques based on the Georgia Rules and Regulations Food Service Chapter 290-5-14 (a.k.a. the Chapter) and subsequent versions adopted hereafter by the Department. Successful completion of the process results in the standardization as a Georgia Standardized Food Service Establishment Inspection Officer.
- 2. The standardization process encompasses both assessing the performance of the Candidate and training to improve his or her performance as well. The District Standard-Trainer evaluates the Candidate's understanding and application of the Chapter's provisions during inspections of food service establishments. In addition, the District Standard-Trainer evaluates the inspection technique used by the Candidate, and he or she imparts knowledge during the Standardization exercise to assist the Candidate with becoming more proficient in the understanding and application of the Chapter and risk-based food service establishment inspection technique. The District Standard-Trainer will discuss, explain and correct interpretations and marking of the inspection report after each inspection. The District Standard-Trainer may also take the opportunity through "teaching moments" during the inspection to point out examples that illustrate the Chapter's provisions, interpretations or as applicable, industry changes.
- 3. The process of questioning used to conduct risk-based food service establishment inspections to clarify procedures and methods helps EHS with their understanding of operations before and after the inspection and is especially useful to EHS during foodborne outbreak investigations.

E. Definitions:

1. "Candidate" means an applicant who successfully completes the eligibility requirements for standardization.

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- 2. "Certificate" means the official document published by the Department and issued by the State Office, Environmental Health Branch or Health Districts that is the official recognition that a candidate has successfully completed all standardization requirements.
- 3. "Complex food preparation" means a process wherein multiple food processes are involved in the preparation of a retail food item, i.e., food is stored, prepared, cooked, cooled, reheated, hot held, and served.
- 4. "CCP" means "Critical Control Point," a point or procedure in a specific food system where loss of control may result in an unacceptable health risk.
- 5. "CL" means "Critical Limit," the maximum or minimum value to which a physical, biological, or chemical parameter must be controlled at a critical control point to minimize the risk that the identified food safety hazard may occur.
- 6. "GRP" means "Good Retail Practices," which are preventive measures that include practices and procedures that effectively control the introduction of pathogens, chemicals, and physical objects into food. Good Retail Practices are prerequisites to instituting a HACCP Plan or Risk Control Plan.
- 7. "HACCP" means "Hazard Analysis Critical Control Point."
- 8. "**HACCP Principles**" means the 7 principles of the Hazard Analysis and Critical Control Point System as follows:
 - (a) Conduct a Hazard analysis;
 - (b) Identify the CCPs in the process;
 - (c) Establish Critical Limits for preventive measures associated with each identified CCP;
 - (d) Establish CCP monitoring requirements;
 - (e) Establish corrective action to be taken when monitoring indicates that there is a deviation from the established critical limit;
 - (f) Establish procedures for verification that the HACCP system is working correctly; and
 - (g) Establish effective recordkeeping procedures that document the HACCP system.
- 9. "**Public Health Interventions**" means preventive measures given in the current versions of the Georgia Rules and Regulations Food Service, Chapter 290-5-14 and subsequent revisions adopted by the Department thereafter. The interventions are:

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- (a) Demonstration of Knowledge;
- (b) Employee Health;
- (c) Hands as a vehicle of contamination;
- (d) Time-Temperature Relationships; and
- (e) Consumer Advisory.
- 10. "**Risk-based inspection**" means a food service establishment inspection approach focused on identifying significant behaviors and practices inherent to the food service establishment operations with particular emphasis on the risk factors and public health interventions.
- 11. "**RCP**" means Risk Control Plan which is a mutually agreed upon written plan between the candidate and the management of the food establishment that describes a management system for control of foodborne disease Risk Factors. The plan delineates necessary records, responsible personnel, what needs to be controlled, and how it will be controlled.
- 12. "**Risk Factors**" means improper practices or procedures, which have been identified by the Centers for Disease Control and Prevention (CDC), through epidemiological data as the most prevalent contributing factors of foodborne illness or injury. Risk Factors include:
 - (a) Poor personal hygiene;
 - (b) Food from unsafe sources;
 - (c) Inadequate cooking;
 - (d) Improper holding temperatures; and
 - (e) Contaminated equipment.
- 13. "RTE" means Ready-to-Eat Food that is food that is in a form that is edible without additional preparation to achieve food safety (or is raw or partially cooked animal food with a consumer advisory), and that is reasonable expected to be consumed in that form. Ready-to-Eat food includes:
 - (a) Potentially Hazardous Food that is unpackaged and cooked to the temperature and time required for the specific food.
 - (b) Raw, washed, cut fruits and vegetables;
 - (c) Whole, raw fruits and vegetables that are presented for consumption without the need for further washing, such as at a buffet; and
 - (d) Other food presented for consumption for which further washing or cooking is not required and from which rinds, peels, husks, or shells are removed.
- 14. "**Standard-Trainer**" means a person who has been standardized by someone employed by the FDA or by the State Office, Environmental Health Branch.

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15. "Standardization" means the process whereby a candidate demonstrates the knowledge and skills to satisfy the requirements for standardization stated within Part-I of Section L in Part-II of the current version of the Interpretation Manual for the Rules and Regulations Food Service Chapter 290-5-14 and subsequent revisions thereafter.

F. Prerequisite Training and Experience:

- 1. To be a candidate for standardization, an Environmental Health Specialist must:
 - (a) Be routinely engaged in the food service program;
 - (b) Have successfully completed a training program for the Georgia Rules and Regulations for Food Service as approved by the State Environmental Health Branch Office of the Georgia Department of Public Health. The applicant, by signing the standardization application and showing his training certificate, indicates that he has attended the required state approved training program and that he successfully passed the final exam achieves successful completion.
 - (c) Have completed basic pre-standardization training provided by the FDA and/or the State Environmental Health Office.
 - (d) Have completed at least 25 food service establishment inspections accompanied by another Environmental Health Specialist and 25 food service establishment inspections on his/her own or 5 years of regulatory inspection in retail food.

G. Standardization Requirements:

- 1. The following areas of performance shall be addressed by the candidate during the retail food establishment inspections and evaluated by the Standard-Trainer:
 - (a.) Good Retail Practices: The candidate shall demonstrate knowledge of current Georgia Rules and Regulations for Food Service related to good retail practices and the ability to interpret and apply them.
 - (b.) <u>Risk-Based Inspection</u>: The candidate shall demonstrate knowledge of current Chapter 290-5-14, Georgia Rules and Regulations for Food Service, or future subsequent Chapters adopted thereafter related to public health interventions and risk factors which are most frequently associated with foodborne illness or injury.

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- (c.) <u>Application of HACCP</u>: The candidate shall demonstrate the ability to verify compliance with an existing HACCP Plan. In the absence of a HACCP Plan, the candidate shall demonstrate the ability to apply all 7 HACCP Principles to the inspection process.
- (d.) <u>Inspection Equipment</u>: The candidate shall be equipped and familiar with inspection equipment essential to each food establishment inspection. During the inspection, the candidate shall demonstrate knowledge of proper use of essential inspection equipment.
- (e.) <u>Communication</u>: The candidate shall demonstrate the ability to effectively communicate with the person in charge and explain significant inspection findings to the person in charge at the conclusion of the inspection.

H. Methodology:

- 1. <u>Standardization</u>: The standard-trainer and the candidate shall conduct 4 joint field inspections of retail food service establishments (including at least 1 with a HACCP Plan) selected by the standard-trainer. The food service establishments selected for inspection during standardization should be in Risk Category Type II or Type III as described in the Rules and Regulations for Food Service. All 4 inspections for standardization should be completed within a reasonable period of time, not to exceed 12 months.
- 2. <u>Re-standardization</u>: The Standard-Trainer and the candidate shall complete 4 joint field inspections of food service establishments including 1 establishment with a HACCP plan, selected by the Standard-Trainer. Each establishment should be in Risk Category Type II or Type III. Re-standardization shall be completed every 5 years after initial standardization is completed. A nomination form will need to be submitted to be re-standardized. <u>See Form K-21 in Section K of this Manual</u>.
- 3. <u>Options of the Standard-Trainer</u>: The Standard-Trainer has the option of adjusting the time period, type of facility selected, and methodology for inspection during the re-standardization process to enhance the effectiveness of the procedure.
- 4. **Performance Evaluation Methods**: The performance of the candidate shall be evaluated by the Standard-Trainer using the methods outlined in the following table:

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Summary of Evaluation Methods for Each Performance Area:

PERFORMANCE AREA	INITIAL STANDARDIZATION	RE-STANDARDIZATION
GOOD RETAIL PRACTICES	Joint Inspections	Joint Inspections
RISK-BASED INSPECTION	Joint Inspections	Joint Inspections
Application of HACCP PRINCIPLES	 Risk control plan Process Flow Charts Verification of existing HACCP Plan; and Orally communicates 7 Principles of HACCP 	 Risk control plan Process Flow Charts Verification of existing HACCP Plan
Inspection Equipment	Field Observations	Field Observations
Communications	Field Observations	Field Observations

I. Equipment Use:

General: Specific inspection equipment is required to effectively and accurately conduct an inspection and evaluate risk factors that contribute to foodborne illness in retail food service operations. The candidate shall be evaluated on the proper use of the inspection equipment during all inspections. See Subsection C (2) of Section D – Part – II and Section H Part – II in this Manual for additional information.

2. Equipment List:

- A. The following is a list of the *essential* equipment recommended to evaluate a retail food operation:
 - (a) Necessary inspection forms and administrative materials;
 - (b) Head cover: baseball cap, hair net, or equivalent;
 - (c) Thermocouple temperature measuring device;
 - (d) Maximum registering thermometer or temperature-sensitive tapes for verifying hot water warewasher final rinse temperature;
 - (e) Chemical test kit for different chemical sanitizer types;
 - (f) Flashlight; and

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- (g) Alcohol swabs.
- B. The following is a list of optional equipment recommended to evaluate a retail operation:
 - (a) Lab coat or uniform to cover street clothes;
 - (b) Light meter;
 - (c) Pressure gauge;
 - (d) Measuring tape;
 - (e) Time-temperature data logger;
 - (f) pH meter
 - (g) Water activity meter; and
 - (h) Camera.

J. Field Exercise:

1. Candidate Inspection Duties:

- A. During all joint food service establishment inspections, the candidate shall take the lead. The candidate shall make introductions and determine who the person in charge is at the beginning of each inspection.
- B. The candidate shall record all observations and inspection data collected during the inspection. For the purpose of tracking temperature patterns, it is recommended that the candidate perform a preliminary survey of food temperatures early in each inspection.
- C. At various times during the field exercise the candidate shall be directed to perform specific tasks, such as explaining code requirements, citing code provisions, calibrating inspection equipment, and preparing flow charts or reviewing HACCP records to demonstrate proficiency in each area.

2. Performance Areas:

- A. During the inspection, the Standard-Trainer shall observe and evaluate the candidate, based on the candidate's interpretation and application of the Rules and Regulations for Food Service. Five performance areas are included in the evaluation:
 - (a) Good retail practices;
 - (b) Risk-based inspection;
 - (c) Application of HACCP Principles;
 - (d) Inspection equipment; and
 - (e) Communications.

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3. Comparison of Findings:

A. Following each joint food service establishment inspection, the candidate shall compare his findings with the Standard-Trainer, and the differences shall be thoroughly discussed before proceeding to the next inspection. The Standard-Trainer shall retain the candidate's inspection reports, flow charts, and risk control plan to document satisfactory completion of standardization requirements.

At the conclusion of the field exercise, the Standard-Trainer shall tabulate and review the candidate's inspection results and other observations to determine if the candidate has successfully completed the requirements for certification.

C. <u>Determining Code Citations</u>:

The appropriate code provision corresponding to each violation observed is to be recorded on the food service inspection form and the descriptive and corrective action language will also be recorded on the its addendum form. For this section only, scoring is not used and does not impact the outcome of the candidate's performance. However, for demonstrating knowledge of the requirements of the Chapter in regards to determining the grade of an establishment, the Standard-Trainer will require the candidate to grade at least one of the 4 inspections of the exercise. The Standard-Trainer will select and designate marked items on the food service inspection form as repeat violations. The candidate will then assign the appropriate numerical score and letter grade as per the requirements found within Rule -.10 of the Chapter.

K. Performance Criteria:

1. To be standardized, a candidate shall meet the following criteria for each performance area:

i. Risk-Based Inspection and Good Retail Practices:

(a) **Inspection Report:** During each inspection the candidate shall complete the *Georgia Food Service Inspection Report Form and Addendum(s)* (See Forms K-1, K-2a and K-2b in Section K in this Manual), based on observations and data collected during the inspection. The candidate shall determine which items on the inspection report form were in or out of compliance, not observed, and/or not applicable based on the observations.

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(b) <u>Recorded Observations and Data</u>: During each inspection the candidate shall record all observations and inspection data and submit to Standard-Trainer.

(c) Candidate Scoring:

- i The Standard-Trainer shall grade each Inspection Report and the listing of observations and data by circling each incorrectly marked item and discussing these items with the candidate after each inspection.
- to reflect a disagreement in a case where the candidate has the opportunity to make an observation or take a measurement and fails to do so, and intervention by the Standard-Trainer would alert the candidate to the missed opportunity. A scoring of "S" should be used in instances such as when an opportunity to take a cooked hamburger temperature is available, but the candidate does not take the temperature and subsequently marks #5-1A as NO. The Standard-Trainer's scoring of an item as "S" represents a disagreement between the candidate and the Standard-Trainer.
- iii At the conclusion of each inspection, the number of disagreements on marked violation categories shall be recorded at the top of the *Food Service Inspection Report Form*. At the completion of the final inspection, the Standard-Trainer shall total the number of disagreements for all food service establishments inspected.
 - I To satisfy the "Risk-Based inspection" performance area, the candidate shall not disagree with the Standard-Trainer on more than 5 items in any one establishment in this section of the Inspection Report, and shall not have more than 16 total disagreements in 4 inspections.
 - II To satisfy the "Good Retail Practices" performance area, the candidate shall not disagree with the Standard-Trainer on more than 22 total items in 4 inspections in this section of the Inspection Report (no maximum on individual inspections).
 - III See Scoring Form K-22 in Section K in this Manual.

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B. Application of HACCP Principles:

- (a) During the food service establishment inspections, the candidate shall demonstrate the proper inspection approach for food service establishments with pre-existing HACCP Plans and those without HACCP Plans. Each candidate shall demonstrate an understanding of HACCP by:
 - i. <u>Flow Charts</u>: (Required for both initial standardizations and restandardizations)

I. Preparing Process Flow Charts:

- a. During the joint inspections, the Standard-Trainer shall select a total of 3 food preparation processes for the candidate to describe on a flow chart to include:
 - 1. Process 1 "No Cook Step"
 - 2. Process 2 "Same Day Service"
 - 3. Process 3 "Complex Food Preparation"
- b. The candidate shall develop each flow chart using information gained through actual observations or operational steps during an inspection. Information gained through discussions with the person in charge and/or food workers should be used to substitute for a lack of observations of operational steps not occurring during the inspection. On each flow chart, the candidate shall indicate the CLs as stated by the Rules and Regulations for Food Service and by the establishment, if differing from those of the Rules. In addition, the candidate shall also indicate to the Standard-Trainer any CCP's which the establishment did not control
- c. Requirements: The Standard-Trainer shall grade the 3 flow charts based on the correct identification of Hazards, CCPs, and CLs. To satisfy this requirement, the 3 flow charts may contain no more than 2 errors or omissions that are not related to CCPs or CLs. If there are any CCP or CL errors or more than 2 errors or omissions that are not CCPs or CLs, the candidate must revise the flow chart independently until it is accurate and reflects that HACCP principles are understood. The Standard-Trainer will review the charts for accuracy to ensure these are correct before issuing the Standardization

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<u>Certificate.</u> The FDA Retail HACCP Guide: "Managing Food Safety, A HACCP Principles Guide for Operators of Food Service, Retail Food Stores, and Other Food Establishments at the Retail Level," and the Rules and Regulations for Food Service will be the reference documents for this exercise.

- d. <u>See Examples 1 through 4A within the Standard-Trainer</u> <u>Checklist Form, Form K-26, within Section K in Part-II of this</u> Manual for examples of flow charts and their expected content.
- ii. **Risk Control Plans**: (Required for both initial standardization and re-standardization)
 - a. Developing a Risk Control Plan: During at least 1 of the joint inspections, the Standard-Trainer will select a CCP that the candidate has determined is not in compliance with CLs set by the Rules. The candidate shall complete a "Risk Control Plan" worksheet (See Form K-18 in Section K of Part-II in this Manual), in order to demonstrate a clear understanding of the observation, process, hazard, critical limits, and corrective actions that are being targeted for a risk control plan. The candidate shall develop a mock hand-written Risk Control Plan with the person in charge. The Risk Control Plan should stress simple control measures that can be integrated into the daily routine of the food service establishment. The plan should be brief and address the following points:
 - 1. What Risk Factor that is out of compliance is to be controlled;
 - 2. How the Risk Factor is to be managed and monitored;
 - 3. Who is responsible for monitoring Risk Factors and what corrective action must be taken when critical limits (CLs) are not met:
 - 4. How and when records are kept;
 - 5. The length of time Risk Control Plan (RCP) will continue (case specific but generally 4-6 week limit);
 - 6. The frequency and format in which the results will be communicated back to the inspector;
 - 7. The plan for re-training food workers
 - 8. What monitoring, record keeping and corrective actions are required (i.e., EHS verification of corrective action(s)).

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- b. Requirements: To satisfy the requirements, all 4 points shall be addresses in the Risk Control Plan; the candidate is not required to ask the person in charge to commit to implementation of the Risk Control Plan.
- iii. **HACCP <u>Plans</u>**: (Required for both initial standardization and restandardization)
 - a. Verification of HACCP Plans: During the joint inspections, the candidate shall select at least 1 food service establishment to inspect that has implemented a HACCP Plan. The candidate shall demonstrate the ability to verify that the HACCP Plan is implemented by reviewing the food service establishment's monitoring procedures and record keeping; verifying that CLs are met, and be substantiating that corrective actions are taken when the CLs are not met. The Standard-Trainer shall select at least 1 CCP for the candidate to verify.
 - 1. The candidate shall review the records for the selected CCPs for 3 specific twenty-four hour periods, which shall include records for the current day, if possible, and 2 additional days selected at random. Based on this review, the candidate shall make the following determinations regarding monitoring, record keeping, and the performance of corrective action for a total of 9 HACCP Plan record answers using the "Candidate's HACCP Verification Summery" (See Form K-25 in Section K of Part-II of this Manual);
 - 2. Required monitoring was performed on the 3 selected dates:
 - 3. Accurate and consistent records appear for the selected dates; and
 - 4. Corrective action was documented in accordance with the plan when CLs were not met on each of the 3 selected dates.
 - b. <u>HACCP Principles</u> (For initial standardization only): The candidate shall orally communicate to the Standard-Trainer the HACCP Principles and how they would apply to the food service establishment's operation.

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- c. Requirement: The candidate shall document findings on the "Candidate's HACCP Plan Verification Summary". The candidate's findings shall be in agreement in <u>at least 7</u> out of the 9 HACCP Plan record answers as those noted on the "Standard-Trainer's HACCP Plan Verification Summary" (<u>see Form K-24 in Section K of Part-II in this Manual</u>).
- C. <u>Inspection Equipment</u>: The candidate shall have essential equipment available for use during each inspection and shall demonstrate knowledge of necessary equipment to conduct a food establishment inspection. The candidate shall know how to properly use and maintain the equipment. Specifically, the candidate shall demonstrate that the temperature-measuring device is accurate at 32°F.

D. Communication:

- (a) Skillful communication is essential to the inspection process in order to effectuate needed changes by the person in charge. Activities and responsibilities involved in a food inspection program require a person to speak and to listen effectively.
- (b) Many different types of communication skills and approaches are necessary and valuable during the inspection process. The candidate shall be required to take the lead in communicating with industry personnel during all inspections and the Standard-Trainer shall evaluate the candidate's communication skills.
- (c) The candidate shall take the lead in communicating with industry personnel during each of the inspections in 3 areas.
 - i. Introduction;
 - ii. Person in Charge interview; and
 - ii. Exit Conference.

I. <u>Introduction</u>:

- a. The candidate shall be required to make all introductions. A complete introduction consists of:
 - 1. Introducing all persons participating in the inspection;
 - 2. Presenting credentials or identification;
 - 3. Describing the purpose and flow of the inspection;

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- 4. Identifying and explaining to the person in charge that it will be necessary to ask questions about the operation during the inspection; and
- 5. Explaining that this is not intended as a regulatory inspection and that there will be no written report left at the end of the inspection; however, significant findings will be brought to the attention of the person in charge.
- b. During the inspections, the candidate shall demonstrate by example the concepts of food safety such as washing hands at the appropriate place and time, wearing the proper inspection apparel, and sanitizing thermometers before probing food.
- c. The Standard-Trainer shall observe and evaluate the candidate by focusing attention on communication skills that relay to the person in charge, the compliance status and any observations, concerns, and alternatives for compliance. Satisfactory performance is achieved if this information is conveyed in a way that is understood, accepted, and acted upon.

II. Interview with the person in charge:

- a. The candidate shall conduct a discussion with the person in charge to determine:
 - 1. If a HACCP plan exists, and if so, whether the person in charge understands the principles of the HACCP plan and is ensuring that the employees are effectively using the plan;
 - 2. What training is provided for employees and managers that is relevant to applying the food code interventions and controlling foodborne illness risk factors;
 - 3. What employee health policies are in effect; and
 - 4. What potentially hazardous foods are on the menu and what production activities are ongoing at the time of inspection.

III. Exit Conference:

- a. At the exit conference, the candidate shall clearly:
 - 1. Convey and discuss in detail with the person in charge the inspection findings including:

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- (i) The compliance status of the food establishment describing each significant violative condition and, where appropriate, acceptable compliance alternatives,
- (ii) The response and plans of the person in charge for correcting violations, including a risk control plan, and
- (iii)Corrective actions observed during the inspection. Such proactive food safety measures should be commended.
- 2 Explain the public health significance of the risk factors and food code interventions, GRPs, and the CCPs which do not meet the CLs as established in the Food Code; and
- 3 Demonstrate the ability to discuss and resolve in a courteous and professional manner, issues that the person in charge might not agree with or clearly understand.

IV. Termination of Field Exercise:

- a. The Standard-Trainer has the option to terminate the field exercise, at any time during the standardization procedure if the candidate is not properly prepared to achieve the required level of agreement.
- b. The Standard-Trainer shall notify the candidate and the candidate's supervisor in writing of the reasons for failure.
- c. The Standard-Trainer shall document the results of the field exercise, with the reasons for termination of the field exercise, following termination of the standardization procedure. This information shall be forwarded to the candidate's supervisor and a copy shall be placed in the State Environmental Health File. All evidence and conclusions reached by the Standard-Trainer shall be documented in writing by the Standard-Trainer and shall be kept for 3 years in accordance with the Freedom of Information Act.

L. Standardization Suspension or Revocation:

- 1. When a standardized person fails to fulfill the required maintenance activities, the Standard-Trainer shall consult with the standardized person to fully examine the reasons for the failure.
- 2. Before suspension or revocation, the Standard-Trainer shall consult with other appropriate personnel in the standardized person's District and with the State Office, Environmental Health Branch of the Georgia Department of Public Health.
- 3. The Standardization Committee shall reach a decision as to whether:



- A. No action should be taken;
- B. A warning letter should be sent to the certified person and the person's supervisor and to the applicable District Environmental Health Director;
- C. The standardization should be suspended temporarily, with notice regarding conditions required for reinstatement; or
- D. The standardization should be revoked.
- 4. The Standard-Trainer shall notify the standardized person and the supervisor of the standardized person, in writing with copy to the applicable District Environmental Health Director, of the Standardization Committee's decision.
- 5. All evidence and conclusions reached by the Standardization Committee shall be documented in writing by the Standard-Trainer and shall be kept for 3 years in accordance with the Freedom of Information Act.

M. Request for Re-Standardization after Termination, Suspension, or Revocation:

1. Candidates may apply for another opportunity to become standardized when an unsuccessful field exercise is terminated by the Standard-Trainer or a standardization suspension or revocation occurs. Before reapplying, candidate should improve their skills and areas of weakness.

N. Appeals Board Members:

- 1. Representatives from the following organizations will comprise the Standardization Committee Appeals Board (Appeals Board):
 - A. An FDA Regional Food Specialist (other than the involved standard);
 - B. A standardized EHS from another district; and
 - C. A State level standardized representative.

O. Filing an Appeal:

1. The candidate, after being notified of the candidate's failure to successfully achieve standardization or re-standardization, may appeal the decision. Should the candidate elect to submit an appeal, this action must be initiated within thirty days of the date of the written notification of the termination, suspension, or revocation.

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P. Appeals Board Meeting:

1. Within 15 days upon receipt of a candidate's appeal by the state office, a meeting of the Appeals Board will be held to determine if the argument regarding the failed standardization process is worthy of being heard.

Q. Hearings:

1. <u>Preliminary Hearing</u>:

A. If the appeal is not convincing, the decision of the Standard-Trainer to terminate the field exercise will stand. Should the Appeals Board determine that the candidate's argument holds merit, the candidate and the Standard-Trainer shall be notified in writing that a hearing will be held, including a date and time for the hearing.

2. Hearing Procedure:

- A. At the hearing, the following procedure will be followed:
 - (a) The candidate will present his argument for reversing the Standard-Trainer's decision:
 - (b) The Appeals Board will have the opportunity to question the action or conduct of the candidate and the Standard-Trainer; and
 - (c) The Appeals Board will make a decision within 15 days upon concluding the hearing regarding the Standard-Trainer's decision; the Appeals Board decision will be either to let the decision stand or to consider conducting an additional standardization exercise.

R. Standardization Maintenance:

1. To maintain standardization, CFSM certification must be maintained current and eight (8) hours of food safety related CEU credit every two years is required.

II. STANDARDIZATION COOPERATIVE AGREEMENT:

<u>Purpose</u>: To provide a mutual agreement to identify the roles and responsibilities of the Georgia Department of Public Health, Environmental Health Branch and District Environmental Health Directors to collaboratively administer the Standardization program.

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<u>Scope</u>: The fulfillment of this agreement is the joint responsibility of the Georgia Department of Public Health's Environmental Health Branch and the District Environmental Health Directors, which represent the 18 Public Health Districts within the State of Georgia.

Cooperative Agreement: Recognizing our collective responsibilities to ensure all Environmental Health (EH) personnel having responsibilities to enforce Chapter 290-5-14 or future subsequent Chapters adopted thereafter, both the District Environmental Health Directors and Georgia Department of Public Health's Environmental Health Branch (we), shall ensure that Environmental Health personnel will become standardized within 2 years of acquiring food service program responsibilities. In addition, we shall establish as our goal to ensure that District Standard-Trainers are offered adequate training to equip them with the knowledge, skills, and abilities to adequately perform their required duties. We believe this commitment will improve our Environmental Health workforces' application of risk-based inspections and strengthen the ability of food programs throughout the State to recognize risk factors and employ public health interventions and HACCP principles to reduce and/or prevent foodborne illness.

It will take a commitment at all levels to meet this objective. As part of the mutual agreement, the Georgia Department of Public Health's Environmental Health Branch agrees to:

- Focus our efforts on a team management approach with District Environmental Health Directors to carry out the Standardization process;
- Administer the Standardization program to the District Standard-Trainers;
- Maintain the Standardization documentation and records for the District Standard-Trainers;
- Apply Continuing Education Unit (CEU) credits to qualifying continuing education earned by Environmental Health Specialists (EHS) and maintain records of awarded CEU credit hours for all EHS;
- Verify prerequisite conditions are met by all nominees for Standardization to ensure the integrity of the Standardization program is maintained;
- Ensure District Standard-Trainers appointed by the District Environmental Health Director are offered adequate class and field training by the State Office Standard-Trainers assigned to their respective districts;
- Provide Standardization Education and Training Seminars to District Standard-Trainers on an annual basis; Ensure that communication from the State Office Standard-Trainers to the District Standard-Training Officers is transparent, thorough, and uniformly presented in such a manner that the information can be readily understood;
- Provide training for new Environmental Health personnel to prepare them to meet the prerequisite training requirements for Standardization;

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- Provide periodic updates regarding Standardization and Food Safety issues to
 District Standard-Trainers to ensure that District Standard-Trainers, District
 Environmental Health Directors, and Environmental Health personnel within the
 State are kept abreast of new developments in food safety and the latest science;
- Provide support, as needed, to District Standard-Trainers in carrying out the Standardization procedures;
- Conduct periodic randomized verification assessments per the State Office of Environmental Health assessment and verification protocols to evaluate riskbased inspection consistency and accuracy of documentation;
- Conduct random verifications at the county-level to ensure that Standardization records are being maintained in the office where each Environmental Health employee works in accordance with Chapter 290-5-14-.09(2);
- Maintain Pre-Standardization records for Environmental Health personnel throughout the State of Georgia;
- Ensure that oral and written communications from the State Office Environmental Health Branch regarding Standardization occur between the State Office Environmental Health Branch, the District Standard-Trainers, and the District Directors;
- Establish uniform procedures to ensure all Environmental Health personnel are properly trained to conduct risk-based inspections, appropriately document their findings, and effectively work with industry to control observed risks; and,
- Promptly notify District Directors of any observed practice or condition that is not in compliance with this agreement.

As part of the mutual agreement, the District Environmental Health Directors agree to:

- Ensure the Standardization program is administered through District Standard-Trainers in accordance with the Georgia Standardization Procedure as referenced within the current editions of the Interpretation Manual for the Georgia Rules and Regulations for Food Service;
- Ensure that oral and written communications from the District regarding Standardization occur between the District Environmental Health Directors, the District Standard-Trainers, and the State Office Environmental Health Branch;
- Ensure that District Standard-Trainers communicate with Candidates in a manner which requires the Candidate to do some degree of research and critical thinking independently when assessing written portions of the Standardization documents;
- Ensure that District Standard-Trainers follow the Georgia Standardization Protocols to conduct the Standardization Process with Candidates:
- Ensure that Environmental Health personnel obtain standardization credentials within 2 years of acquiring food service program responsibilities;
- Ensure Environmental Health personnel attend state-mandated training and conference calls to ensure that each District Standard-Trainer is kept abreast of food safety issues, the latest science, and Standardization updates and share that information with EHS conducting food service inspections;

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- Ensure standardized Environmental Health personnel maintain credentials by completing eight (8) hours of food safety related CEU credit every two (2) years and maintain a current Certified Food Safety Manager credential;
- Ensure District Standard-Trainers communicate information obtained through conference call minutes and other written documents which concern standardization to standardized Environmental Health personnel;
- Ensure District Standard-Trainers provide an adequate and documented risk-based inspection training program to new Environmental Health personnel;
- Ensure District Standard-Trainers verify the pre-standardization prerequisites are met by all Candidates prior to beginning their Standardization process;
- Ensure CEU records are maintained for all Standardized Environmental Health personnel within their District;
- Appoint up to two (2) District Standard-Trainers to represent the district regarding standardization matters:
- Ensure routine assessments of the Standardization program at the district and county levels are conducted and areas of weakness are addressed by the District Standard-Trainers;
- Ensure District Standard-Trainers are informed to promptly notify District EH Directors of any observed practice or condition that is not in compliance with this agreement; and,
- Respond to State Office assessment and verification findings by stating how deficiencies will be addressed.

Instructions for Completing New Forms:

A. STANDARD-TRAINER CHECKLIST:

Standard-Trainers may use the Standard-Trainer Checklist (see Form K-26 in Section K of Part-II of this Manual) as a guide for ensuring that all files necessary to complete a Standardization packet are uniform and complete prior to releasing the Standardization Certificate. Standard-Trainers should not release the Standardization Certificate until all documents required to complete the packet are submitted and meet the standards set forth in the Georgia Standardization Procedures as referenced within the current editions of the Interpretation Manual for the Georgia Rules and Regulations for Food Service and meets the criterion set forth in this Cooperative Agreement.

The following information provides a description of the information that the Standard-Trainers should review to ensure the Standard-Trainer is aware of the documentation that must be provided to meet the Pre-standardization and Field Standardization requirements to complete Standardization. Once the District Standard-Trainer has compiled all required Pre-Standardization documents as

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identified below, he/she should check off each item on Form and submit the required documents to the State Office Lead Standard-Trainer so the Lead Standard-Trainer can verify that all Pre-Standardization requirements have been met. Upon verification, the State Office Lead Standard-Trainer will notify the District Standard-Trainer that the Candidate has met the requirements and can begin the Field Standardization. The Field Standardization documentation must be submitted to the State Office Standard-Trainer for Candidates undergoing their Initial Standardization. District Standard-Trainers must hold all Field Standardization documents until a complete packet can be submitted to the State Office for review. For re-standardization, none of the documents will be submitted to the State Office unless the District Standard-Trainer requests assistance. For both the initial standardization and re-standardization, incomplete packets will be returned.

For the purposes of these documents, the term Standard-Trainer will refer to State Office Standard-Trainers and District Standard-Trainers.

<u>Pre-Standardization Requirements</u> (SEND TO STATE OFFICE):

1. Standardization Nomination Form:

The Georgia Standardization Nomination Form (see Form K-21 in Section K of Part-II in this Manual) must include the following information: the Candidate's hire date (providing the dates of employment, the name of employer), the date the Candidate acquired food service responsibilities, the details regarding the Candidate's food service duties (such as the number of inspections conducted per day, month, wk, or yr), the dates of pre-standardization training (25 joint and 25 individual inspections with the name of the Standard-Trainer that accompanied the Candidate and/or oversaw the training program for the Candidate) or ORAU Certificates, and the signature of the Candidate's District Environmental Health Director on the form. The present duties of the Candidate must be listed on the Nomination Form for all programs in which the Candidate has involvement, as well as verification of training either by listing such training on the nomination form or by attached copies of training documentation (inspection forms, certificates, Georgia food code test, name of trainer, etc.).

2. Georgia Rules and Regulations Food Service Test:

Current Procedure:

The Georgia Food Code Test must be taken and submitted to the State Office on a 3.5 floppy disk for grading. A grade of 70 or above is a passing score. If the test is sent to Florida for grading according to instructions on the 2006 Georgia/FDA Interactive Food Code Training CD, submit the score sheet to the State Office. In the event a 3.5

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floppy disk drive is not available, the food code test can be emailed (Score and Name) to the State Office Lead Standard-Trainer for processing.

Future Procedure:

The State Office, Environmental Health Branch of the Georgia Department of Public Health, is in progress of creating a training program and test to be offered the Department's Training website. The purpose of this online training program will be to make available, on a continuous basis, a means of providing training and retraining of EHS in regards to Georgia's current rules and regulations governing food service establishments. Once this online training program has been developed, tested, and activated, District Environmental Health Directors and District Standard-Trainers will be notified by the State Office and the Interactive Training CD will be discontinued.

3. Food Safety Manager Certificate:

A copy of the Candidate's Food Safety Manager Certificate that is issued from a program accredited by the Conference for Food Protection (CFP) must accompany the packet if the Certificate is updated after being submitted as a prerequisite. The Certificate must show that the Candidate's Certificate is current. Expired Certificates will not meet this criterion

<u>Field Standardization Requirements</u> (MAINTAIN AT THE OFFICE IN WHICH CANDIDATE WORKS):

Note: THESE DOCUMENTS MUST BE SUBMITTED TO THE STATE OFFICE STANDARD-TRAINER FOR CANDIDATES UNDERGOING THEIR INITIAL STANDARDIZATION.

1. HACCP Verification Summary:

Both the Candidate and the Standard-Trainer HACCP Verification forms (See Form K-25 and Form K-24 in Section K of Part-II in this Manual) should be included in the file. The Verification form for the Standard-Trainer is distinctly different from that of the Candidate whereas it has a space to record the number of disagreements that occur between the Standard-Trainers' recorded answers and the Candidate's recorded answers. These forms can be distinguished by the title of the form. To demonstrate proficiency in the HACCP Verification Summary, the Candidate and Standard-Trainer must have ≤ 2 disagreements between them. The Candidate and the Standard-Trainer must circle "yes" or "no" on their individual HACCP Verification Summary Forms (NA for not applicable is not acceptable for this exercise). If the establishment's HACCP plan identifies what is to be done in regards to corrective actions and the log has a provision for corrective actions to be recorded, it is suitable

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to use and should be marked "Yes" if all temperatures logged are within the critical limits <u>or</u> if not within the critical limits but the appropriate corrective action was taken. A "No" should be marked if the temperature logged is not within the critical limits and an appropriate critical limit was not taken. See the HACCP Plans section in the Georgia Standardization Procedures for more information.

2. Scoring Form:

The 4 inspections conducted during the Standardization should be listed on the Scoring Form (see Form K-22 in Section K of Part-II in this Manual) along with the Risk-Based Inspection Disagreements, the Good Retail Practice Disagreements, the name of the Standardizing Officer, and a check in the box to determine whether an Initial Standardization or a Re-Standardization was conducted. The Inspection reports and addendums conducted by the Candidate and the Standard-Trainer should accompany these documents in the Candidate's file. For at least 1 of the 4 inspections, the violation should be written out to the provision and numerically scored according to the point value for each item to ensure that the Candidate demonstrates proficiency in this area. Further, the Standard-Trainer will mark at least one inspection with random marked repeats to sufficient to determine that the candidate understands how the additional one (1) or two (2) points are utilized as repeat violations for scoring. The four inspections should be submitted to the State Office with the packets for initial standardizations.

When submitting the Scoring Form the Candidate and the District Standard-Trainer must have ≤ 5 RF/PHI disagreements per inspection, ≤ 16 RF/PHI disagreements in 4 inspections, and < 22 GRP disagreements in 4 inspections to meet the criterion for Standardization. During this Standardization process, the District Standard-Trainer must evaluate the Candidate to determine that he or she has demonstrated proficiency in all aspects of the process. If at such time as a District Standard-Trainer determines that a Candidate is deficient in the area of risk-based inspections (which is determined by exceeding the number of disagreements between the District Standard-Trainer and the Candidate, as mentioned previously), the District Standard-Trainer should suspend the risk-based inspection portion of the exercise until such time as the Candidate has conducted sufficient practice inspections with the District Standard-Trainer that demonstrate proficiency in that area. Any inspections conducted prior to the risk-based inspection portion of the exercise being suspended can not count toward the exercise and will be considered practice inspections. The District Standard-Trainer must continually assess the Candidate's level of recognition of provision violations, understanding of the concepts, inspection report marking determinations, skills in communication, etc for conducting the risk-based inspection. If the Candidate is not demonstrating proficiency in this area (which is associated with an increased number of disagreements), it may be necessary to suspend the riskbased inspections early on in the process (i.e. the first inspection or second inspection) rather than later in the process (i.e. the fourth inspection) when the

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Candidate does not meet the threshold for disagreements as set forth by the Georgia Standardization Procedure. Since the District Standard-Trainer cannot discuss concepts or communicate in any way with the Candidate during the risk-based inspections that count towards Standardization, the practice inspections will allow the District Standard-Trainer to work with the Candidate in perfecting his or her risk-based inspection skills. Once the District Standard-Trainer assesses that the Candidate has demonstrated proficiency in the practice risk-based inspections; the inspections for the Standardization can begin starting with inspection number one. Please be mindful that the risk-based inspections that count towards Standardization must be conducted as four consecutive inspections. All four inspections must be conducted at an Risk Type II or Risk Type III establishments and at varying types of operations such as a an Institution serving a Highly Susceptible Population (HSP), a self-service establishment (i.e. buffet) and non-traditional food establishments.

3. Final Performance Report:

The Standard-Trainer must complete the Final Performance Report Form (see Form K-23 in Section K of Part-II in this Manual) and notate any comments regarding the Level of Agreement for a particular performance area, print their name, sign, and date the form.

4. Process Flow Charts:

All Process Flow Charts must have the following sections completed: recipe, hazards, prerequisite programs, and the flow diagram of the food based on the recipe. Refer to Examples 1 and 1A as guides. Each packet should include a Process 1 (no cook), Process 2 (same day service), and Process 3 (complex food prep) food flow. There must be a recipe for each process and recipes must completely reflect the flow of the process that it represents. The candidate should have asked the PIC and documented the operational steps (food flow), the ingredients used and steps in preparation, and the manner in which ingredients are received (fresh, frozen, dry goods, etc). If whole muscle, intact beef steak is used, the candidate must document the method that was used to verify the product was whole muscle intact beef in the prerequisite programs (information from box or letter from supplier).

Please note that ingredients in recipes used for flow chart (process 1, 2, and 3) exercises must include potentially hazardous foods (time/temperature control for safety foods).

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See Examples 2, 3, 4, and 4A within Standard-Trainer Checklist GADPHForm: STCF-A-09-02-2010/K-26 Section K of Part-II in this Manual. Please take note, the menu items given in these Examples cannot be utilized by Candidates during their standardization exercise. Flow charts using said menu items will not be accepted for evaluation by District or State Environmental Health Office Standard-Trainers.

5. Risk Control Plan:

Standard-Trainers must ensure Candidates select an out-of-control risk factor observed during one of the Standardization inspections to complete the Risk Control Plan Chart (see Form K-18 in Section K of Part-II in this Manual). In addition to completing the chart, the Candidate must work with the Certified Food Safety Manager/Person in Charge (CFSM/PIC) to complete a Risk Control Plan in the food service establishment at the time of inspection. It should be handwritten, since it is completed in the field to demonstrate the Candidate's ability to work with the CFSM/PIC to develop a plan to control a risk factor observed during the inspection. The plan should include elements of how the risk factor is managed and monitored, how and when records are kept, the length of time Risk Control Plan (RCP) will continue (case specific but generally 4-6 week limit), the frequency and format in which the results will be communicated back to the inspector and the plan for retraining food workers.

<u>See Example 5 within Standard-Trainer Checklist GA DPH Form: STCF-A-09-02-2010/Form K-26 of Section K of Part-II in this Manual.</u> Please take note, the example Risk Control Plan is provided as a guide only and cannot be utilized as part of Candidate's standardization documentation.

B. COMMENTS FOR STANDARDIZATION DOCUMENTS COVER SHEET (SEE GA DPH Form: CFSDCS-A-09-02-2010/Form K-27of Section K of Part-II in this Manual):

The Field Standardization documentation must be submitted to the State Office Standard-Trainer for Candidates undergoing their Initial Standardization. District Standard-Trainers must hold all Field Standardization documents until a complete packet can be submitted to the State Office for review. When Initial Standardization documents are submitted to the State Office or in cases in which the State Office is asked to provide support in reviewing Re-Standardization documents from the District Standard-Trainers, the State Office Standard-Trainers will review the Standardization documents and provide comments back to District Standard-Trainers on the Comments for Standardization Documents Cover Sheet. All documents submitted to the State Office Standard-Trainers must be complete and submitted together as a complete packet; otherwise, an incomplete packet will be returned to the District Standard-Trainer and the review will be delayed until all completed documents are submitted together.

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Standardization Protocols:

In order to maintain a consistent and uniform Standardization Program, the State Office has implemented various protocols to ensure continuity throughout the Program.

A. <u>Training</u>:

Training will be used as a tool to maintain the effectiveness of the program at various levels to ensure that all levels of staff receive adequate training and are kept abreast of food safety issues and the latest science.

i. State Office Standards Training:

State Office Standards will obtain FDA Food Inspection Training Officer Standardization credentialing and attend FDA SE Regional Food Safety Seminar for food safety training to keep abreast of the latest science and food safety updates.

ii. <u>District Standard-Training Course:</u>

The State Office will develop a Training Course for District Standard-Trainers as a tool to ensure continued uniformity. This course entitled, Annual Georgia District Standard-Trainer Educational Seminar will assist District Standard-Trainers in carrying out the program based on the protocols and ideals set forth in this agreement on an annual basis. The District Standard-Trainers must demonstrate the knowledge, skills, and abilities to perform the duties of a District Standard-Trainer upon completion of the training.

iii. Training of Environmental Health Specialist (EHS):

New EHS must undergo a training program in which a Standardized EHS accompanies them on a minimum of twenty-five (25) joint inspections and twenty-five (25) independent inspections. The twenty-five (25) independent inspections must be reviewed and signed-off on by a Standardized EHS to verify that the inspection reports and addendum forms have been checked for accuracy (violations marked in the correct place on the inspection form according to the marking instructions) and are filled out completely. The New Environmentalist Training Food Modules will be offered on a yearly basis by the State Office to ensure that new Environmentalists' are equipped with essential knowledge of food safety principles to meet the food safety training pre-requisite for Pre-Standardization. In addition to the class and field training, EHS must obtain food safety certification through a nationally recognized and accredited program approved by the Department prior to

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acquiring and performing food service program responsibilities. This certification is also required and must be maintained to in order to satisfy the Pre-Standardization Requirements and maintain his/her Standardization. District Standard-Trainers should not begin the Standardization process with a Candidate until all Pre-Standardization requirements have been met. The District Standard-Trainer must submit the Georgia Food Code Test on a 3.5 floppy disk to the Lead State Standard-Trainer for the test to be graded. The Lead State Standard-Trainer will grade the exam and send the score and results back to the District Standard-Trainer to include in their documentation packet. The District Standard-Trainer must conduct all training of a Candidate prior to commencing the Standardization process (see District Standard-Trainers' Communication with the Candidates for more information on the District Standard-Trainer's role during the Standardization process).

iv. Continuing Education Credits (CEUs):

Chapter 290-5-14-.09(1)(c) requires Environmental Health personnel with assigned responsibilities in food service plan review, permitting, inspecting or other means of enforcing the Chapter to successfully complete eight (8) hours of food safety related CEU credit every two years, beginning January 1, 2010. Beginning January 1, 2010, this two year cycle to obtain CEU hour credits will begin for all Environmental Health personnel assigned responsibilities for enforcing the Chapter. District Standard-Trainers must be alerted by the EHS upon completing a course in which they have earned CEU credit so that the District Standard-Trainer can forward a completed "Application for Certification of Continuing Education Units for EHS working in the Food Program: (found on page K-19 of the Georgia Interpretation Manual) and a completed "Continuing Education Participant Registry Form" (found on Page K-20 of the Georgia Interpretation Manual) to the State Office CEU Coordinator to receive the credit. The CEU Coordinator will send a confirmation back to the District Standard-Trainer as to the number of hours granted for the course to keep in their files. The following guidelines apply to CEUs:

- On January 2, 2010, CEUs earned in each two year cycle will not carry over to the next two year cycle;
- Time lines for Standardization and CEU requirements run independently of each other;
- The time line for standardization begins when duties in the Food Service Program are assigned to EHS;
- Specific courses taken cannot be repeated in consecutive two (2) year cycles and receive CEU credit;

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The FDA's ORAU Training CEU food service program related training transcripts such as but not limited to food service plan review training, foodborne illness (FBI), and/or inspection training will automatically be accepted as CEU credit to EHS standardization certification (each ORAU credited CEU hour will be equal to 10 contact hours or a tenth hour = 1 hour); and, Institutional training which is training provided by an outside educational institution, such as through the University of Georgia Education Extension Service, must be related to the food service program? CEU credits from such training courses will be accepted on a case-by-case basis at the discretion of the Department of Community Health, Environmental Health Branch.

Some additional information for programs submitting documentation for CEU approval is as follows:

- An in-service program schedule listing the specific time frames, topics and presenters must be provided. Give a synopsis of each presenter and information on each topic to be presented;
- Each CEU hour must have a minimum of 50 minutes of contact time;
- Each CEU half hour must have a minimum of 25 minutes of contact time;
- Breaks, meal times, registration times, etc. do not count toward continuing education credit totals;
- At the conclusion of the training event, the sponsoring organization is responsible for submitting a list of participants on forms (see Forms K-19 and K-20 in Section K of Part II of this Manual) provided for the Department for record-keeping; and,
- All program presenters are considered to be part of the overall program presentation and therefore will not be eligible for any CEUs granted for any of the submitted programs.

B. Communication:

Clear communication is an additional tool that will be used to maintain the effectiveness of the program at various levels. The key aspect that all parties need to employ in order to ensure clear communications is to use direct lines of communication from the State Office Standard-Trainer to the District Standard-Trainer and/or District Environmental Health Director and to the State Office from the District Standard-Trainer and/or District EH Director. The lines of communication are outlined below:

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i. State Office Standard-Trainers' Communication with District Environmental Health Directors:

A tier system for Standards was implemented in the initial phases of Standardization (in 2007) to help with the surge in Candidates that needed to be standardized at the county level prior to the mandated two year time frame in which all Environmental Health personnel having responsibilities for enforcing the Chapter. This is no longer the case; therefore, upon ratification of this agreement, District Environmental Health Directors are asked to reduce the number of Standardized-Training Officers within the Districts to two (2) or less (three (3) District Standard-Trainers may be possible for larger areas on a case-by- case basis). The two names for District Standard-Trainers submitted by the District Environmental Health Directors for their respective Districts are the only persons in which the State Office Standard-Trainers will communicate with the exception of the District Environmental Health Director. In order for any changes to be made to the person representing the District as a District Standard-Trainer, the change must be made from an appointment by the District Environmental Health Director and announced to the State Office Food Service Program Director. A State Office Standard-Trainer or the FDA must have standardized the EHS the District Environmental Health Director appoints to the position of District Standard-Trainer, unless otherwise agreed upon by the State Office Food Service Program Director.

ii. <u>State Office Standard-Trainers' Communication with District Standard-Trainers:</u>

Conference Calls: The communication between the State Office Standard-Trainers and the District Standard-Trainers must be transparent, thorough, and uniformly presented in such a way that the information can be readily understood. The Lead State Office Standard-Trainer will host periodic conference calls to update District Standard-Trainers on issues regarding Standardization and food safety. While all Standards may listen in on the calls, it is designed as a communication tool in which the State Office and District Standard-Trainers can share ideas and information, and monitor Standardization progress. Therefore, only the Food Service Program Director, State Office Standard-Trainers, District Standard-Trainers, and District Environmental Health Directors will be acknowledged on the calls. If a District Standard-Trainer is unavailable to listen in on the call, he/she should provide the call information to the person who will represent their District on the call and provide that person's name to the state office and the District Environmental Health Director to ensure that the person assuming that responsibility is acknowledged on the call. The conference calls will continue to be a forum by which the State Office Standard-Trainers can provide

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interpretative support to the District Standard-Trainers and for District Standard-Trainers to share information with each other and County EHS. The times and call-in information will be distributed by email from the State Office to the District Standard-Trainers (appointed by the respective District Environmental Health Director) and the District Environmental Health Directors. The conference call minutes will be distributed by email to District Standard-Trainers and District Environmental Health Directors. The District Standard-Trainer or the person identified as representing the District on the conference call is responsible for dissemination all information and conference call minutes within that District and respond to the State Office with acceptance of the minutes. All communication from the State Office Standard-Trainer will be made directly to both the District Standard-Trainer and the District Environmental Health Director.

<u>Interpretation Issuance</u>: In order to foster consistent interpretation and enforcement of the Chapter's Rules and Regulations, the Georgia Department of Public Health's Environmental Health Branch Office will communicate interpretations as per Section A entitled, "Interpretations" located in Part-I of this Manual.

iii. <u>District Environmental Health Director's Communication with the District Standard-Trainers:</u>

The District Environmental Health Directors must maintain communication with their respective District Standard-Trainers to ensure that active managerial control of the standardization process is being maintained uniformly throughout their districts. In addition, District Environmental Health Directors are to ensure adequate monitoring of the Standardization Process and subsequent inspections are conducted in accordance with the Georgia Standardization Procedure as referenced within the current editions of the Interpretation Manual for the Georgia Rules and Regulations for Food Service and meet the criterion set forth in this Cooperative Agreement.

iv. District Standard-Trainers' Communication with the Candidates:

The District Standard-Trainer must communicate with Candidates in a manner that requires the Candidate to do some degree of research and critical thinking on their own. The District Standard-Trainer must provide all communication regarding Standardization to the Candidate. In addition and while reviewing a packet, the State Office Standard-Trainer will send back all materials if any documents are missing or incomplete. District Standard-Trainers will be instructed to hold all information at the county level and send packets to the

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State Office once they have been completed. During the risk-based inspection portion of the Standardization, the District Standard-Trainer should not communicate with the Candidate to ensure that the District Standard-Trainer must assess the applied knowledge and ability of the Candidate rather than continue to train the Candidate during the process. If it is determined through assessing the Candidate's applied knowledge and abilities the Candidate needs further training, the District Standard-Trainer should then suspend the Standardization process and work with the Candidate on areas of weakness.

C. Conducting Assessments:

The State Office's Environmental Health Branch will develop a self-assessment procedure (see Part-III in this Section) for the districts to use in conducting internal assessments to ensure a uniform method is consistently performed throughout the State. Subsequent to the district assessments, the State Office's Environmental Health Branch will verify of the district assessments as outlined by the soon-to-be-developed assessment and verification procedures. In this way, the State Environmental Health Office will be able to ensure the overall goals and objectives for Standardization of the food service program have been reached. District Environmental Health Directors will be responsible for assigning the duties to begin their district's assessment phase once their respective district has completed the standardization phase of tenured employees. The assessment and verification process will enable the State Office to focus its training and standardization integrity efforts. Likewise, districts will be able to identify areas that should be strengthened in completing inspection reports and documenting observations correctly, since the reports are legal documents subject to review by courts.

D. Documentation/Record Keeping:

District Environmental Health Directors will ensure District Standard-Trainers monitor and verify that records for training, standardization, and CEU credit for Environmental Health personnel are being maintained in the office where each Environmental Health Employee works in accordance with Chapter 290-5-14-.09(2). Upon ratification of this Cooperative Agreement District Environmental Health Directors will be provided with a Certificate. District Environmental Health Director and the District Standard-Trainer will sign this Certificate to certify that the Candidate has satisfactorily demonstrated competence to interpret and apply the provisions of the Georgia Food Service Rules and Regulations Chapter 290-5-14 (or future subsequent Chapters adopted thereafter by the Department) as a *Standardized Food Service Establishment Inspection Officer*. This Certificate will have an expiration date that is five years from the date of issuance. Upon completion, a copy of the Certificate should be kept in the office where each Standardized Food Service Establishment Inspection Officer works

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and a copy should also be sent to the Lead State Standard-Trainer to be placed in the Candidate's file. All other documents completed during the re-standardization process will remain in the office of employment of each Environmental Health employee unless District Standard-Trainers requests assistance from State Office Standard-Trainers.

E. Re-standardization:

The Re-Standardization procedure must be conducted as set forth in the Georgia Standardization Procedure as referenced within the current editions of the Interpretation Manual for the Georgia Rules and Regulations for Food Service. When conducting re-standardization, all standardization materials will remain at the environmental health office within the county of employment. Upon completion, a copy of the Candidate's Certificate should kept in the office where each Standardized Retail Food Inspection Officer works and a copy should also be sent to the Lead State Standard-Trainer to be placed in the Candidate's file. County EHS must be Re-Standardized by District Standard-Trainers appointed by the District Directors; however, District Standard-Trainers must be Restandardized by the State Office Standard-Trainers or the FDA.

F. Ratification:

Acceptance of this Agreement will be in the form of emails from individual District Environmental Health Directors stating their acceptance of this Agreement. In turn, the State Environmental Health Branch Office will acknowledge receipt of the District Environmental Health Directors' acceptance of this Agreement. This acknowledgement will be in the form of an email to District Environmental Health Directors stating that this ratified Agreement is now in effect.

III. SELF-ASSESSMENT AND VERIFICATION PROCEDURES:

A. Purpose:

1. The purpose of the Standardization of Environmental Health Specialists (EHS) is to enhance the consistency of risk based inspections of food service establishments in Georgia. As a result, risk factors that have been reported by the Centers for Disease Control and Prevention (CDC) as those that most often cause foodborne illness will be reduced to safe levels or eliminated, resulting in a reduction in occurrence of foodborne illness itself.

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- 2. The dining public places its trust in the posting of food service inspection reports along with their numeric scores and letter grades as required by Georgia's current rules and regulations that govern food service establishment activities. They see these inspection reports as a means for them to make a well-informed decision concerning their health. It is the responsibility of District Standard-Trainers, District Environmental Health Directors, and the State Environmental Health Office to objectively evaluate compliance with Georgia's Rules and Regulations Food Service Chapter 290-5-14 to see that the public trust is maintained.
- 3. To ensure uniform assessments of standardization, the State Environmental Health Office has developed a quality assurance protocol. This protocol was developed in order to evaluate the level of compliance with standardization requirements as set forth within Chapter 290-5-14 and its subsequent versions adopted hereafter, as well as those within Section L in Part-II of this Manual. In order to have an effective food service standardization program, District Environmental Health Directors must provide adequate supervision, trained staff, continuing education, appropriate equipment and supplies, administrative support, internal self-assessments, along with corrective actions, and adequate record-keeping. Section D, Section K and Part-I and Part-II of Section L all located within Part-II of this Manual provide guidance and direction within these areas of responsibility.
- 4. The following subsections delineate the procedures necessary to assess standardization compliance and to take corrective actions to ensure inspection quality, inspection frequency and uniformity among county EHS Staff.

B. Description of Requirements:

- 1. The Food Service Program both at the State Office, Environmental Health Branch, and District Environmental Health Levels must implement an ongoing quality assurance program that evaluates inspection uniformity to ensure inspection quality, inspection frequency and uniformity among EHS. The quality assurance program shall:
 - (a) Be an on-going program;
 - (b) Assure that each EHS:
 - i. Is correctly assessing establishments;
 - ii. Is correctly recording findings on the food service inspection report form;
 - iii. Is acquiring corrective actions during inspection; and
 - iv. If necessary, is taking enforcement action;

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- (c) Self-Assessing;
- (d) Take corrective action through EHS mentoring and training as a result of evaluation of self-assessments; and
- (e) Must be collaborative and supportive between Health Districts and the State Office, the Environmental Health Branch of the Department of Public Health (DPH).

C. <u>District Self-Assessment: Reporting and Corrective Action Protocols:</u>

1. <u>Introduction</u>: Achieving uniformity among food service inspections conducted by EHS will be an essential component in identifying and controlling the risk factors that lead to food borne illness, which can subsequently minimize the occurrence of foodborne related illnesses. This assessment tool is modeled around the Food and Drug Administration's (FDA) standard four (4) - uniform inspection program to measure the uniformity among food service inspectors in citing regulatory provisions, completing accurate inspection reports and addendum forms, and documenting specific, legally-binding observations. The assessment will be an on-going, self-correcting evaluation process that will be conducted once every 6 months (i.e., 2 assessments per year). The focus of this tool is to measure the overall performance of districts in regard to the performance indicators contained in this protocol rather than on individual EHS.

2. Purpose:

- (a) To ensure the integrity of the food service program is maintained and accomplishing its mission, which is to minimize the occurrence of foodborne related illness
- (b) To identify strengths and areas for improvement within the food service program at the district and statewide level.
- (c) To provide a self-monitoring, self-correcting tool for both District Environmental Health and State Environmental Health Office Personnel to utilize in monitoring inspection activity, analyzing reporting data, and reporting results
- (d) To obtain data that will assist decision-makers in making determinations regarding areas to focus efforts and resources.
- (e) To identify practices and policies at the District level that appear to be "working" (i.e. having the greatest impact in achieving conformance based on the performance indicators) so that these practices and policies can be shared with additional public health districts
- (f) To generate data that may influence the development, implementation, and/or improvement of the policy and procedures within the food service program

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3. Performance Indicators:

- (a) The assessment focuses on the risk factors developed by the Conference of Food Protection (CFP) which includes the top five (5) risk factors to foodborne illnesses that have been identified by the Centers for Disease Control (CDC). There are twenty-two (22) individual performance elements that are grouped into four (4) performance measures in this assessment. The four (4) performance items assessed within the protocol are as follows:
 - i. All required information in the Inspection Report Header for each inspection of an establishment is complete (9 elements):
 - I. <u>Establishment Name Recorded</u>? The full name of the establishment where the inspection is conducted.
 - II. <u>Establishment Address Recorded</u>? The full address of the establishment where the inspection is conducted.
 - III. <u>Permit Number Recorded?</u> The county assigned food service establishment permit number for the establishment where the inspection is conducted is recorded on the food service establishment inspection form.
 - IV. <u>Date Recorded?</u> The date the inspection is conducted at the establishment is recorded on the food service establishment inspection form.
 - V. <u>Certified Food Safety Manager (CFSM) Information Provided?</u>
 The Certified Food Safety Manager is identified or information is provided on the Inspection Report and/or Addendum Sheet which documents why the CFSM information was not completed.
 - VI. <u>Purpose of Inspection Indicated? The</u> purpose of inspection should be bubbled in to correspond with the reason the EHS is conducting an inspection at the establishment. The determination in which item to bubble is to be in agreement with the following statements: The initial or preliminary inspection of the food service establishment is that which is conducted at the time a food service permit is to be issued to operate the food service establishment. Since this inspection is conducted by the Health Authority after all of the food service establishment's construction and/or remodeling work has been completed, employees should not be operating; therefore, many of the Risk Factors for Public Health Interventions (RF/PHIs) listed as "NO" or "NA" will not apply, since the focus of the inspection is on Good Retail Practices (GRPs). The first routine inspection of a food service establishment should be

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conducted within sixty (60) days from the date of the issuance of a food service permit. Follow-up inspections are conducted by the Health Authority in response to findings of a routine inspection. Should a food service establishment receive a grade of "C" and or "U" during a routine inspection, the Health Authority must conduct a follow-up inspection. However, if a food service establishment receives a grade of "C" during a follow-up inspection with all Risk Factors/Public Health Interventions (RF/PHIs) corrected as required within Rule 290-5-14-.10 Subsection (2) (i) 1 and 2, then at the option of the Health Authority, no additional follow-up inspections will be required by the Chapter. Complaints and other inspection types will not be used for the purposes of this assessment.

- VII. Risk Type Indicated? The risk categorization is identified for the selected establishment. Proper Risk Type categorization is filled in. The Risk Type should categorization should be based on the processes and menu items served. For example, a Risk Type I establishment would not have a cooking step in the processing of food. They may reheat precooked foods that have been processed and packaged in a commercially permitted processing plant. A Risk Type II establishment would be an establishment that does have a cook processing step within the flow of food through the establishment. A Risk Type III establishment will have processing steps similar to a Risk Type II establishment; however, the significant identifying factor between the two types is that a Risk Type III establishment conducts food processing that is outside the critical limits given in the Chapter to control risk factors to foodborne illness. These food processing steps can only be carried-out under a required HACCP Plan that indicates such processing steps can be safely conducted on a continual basis.
- VIII. <u>Scoring Recorded?</u> When applicable, the last score (with date), prior score (with date), current score, and respective grades (for all three) are identified for the selected establishment.

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- IX. Is Debited Scoring Tallied to Correspond with the Subcategory? For instance, Item 3-1A and 3-1B violations should result in 9 points being deducted from the score. These 9 points should be noted on the Inspection Report to the left of the bubbles under the Approved Source heading. For Item 4-1A and 4-2A violations, the subcategories under the heading Protection from Contamination are different therefore 9 points and an additional 4 points should be deducted (which totals 13). These 13 points should be noted on the Inspection Report to the left of the bubbles under the Protection from Contamination heading. Mark Not Applicable if no debited scoring was made during the inspection (ex. current score 100).
- ii. The compliance status of each risk factor and intervention is documented (4 elements):
 - I. <u>Has a Commitment Been Made for each (RF/PHI)</u> <u>Category/Subcategory?</u>
 - II. Are "NA" (Not Applicable) and/or "NO" (Not Observed) is not Marked When it Should Not Be Based on the Marking Guide Instructions? (i.e. Items 1-2, 2-1A, 2-1B, 2-1C, 2-2A, 2-2B, 2-2C, 2-2D, 3-1A, 4-1A, 4-1B, 4-2A, 4-2B, 5-2, 6-1A, 7-1, 8-2A, 8-2B, and 9-2 except when applicable) Refer to marking instructions to determine instances in which these items may be marked as "NA or "NO".
 - III. ** Flag for further assessment: Are Items 7-1 Marked to Correspond with establishments that serve a Highly Susceptible Population (HSP) and 5-1A and 9-2 Marked to Correspond with Risk Type Identified within Header? For example, an establishment marked as a Risk Type 1 should only be marked "NA" for Item 5-1A. An establishment marked as a Risk Type 1 or 2 should not have an Item 9 (Conformance with Approved Procedures) marked as "In" or "Out"; therefore, an approved HACCP plan should not be in the establishments file. Only establishments in which the general population are immunocompromised, pre-school age children, or older adults in a facility that provides services such as custodial care, health care, or living such as a child or adult day care center, kidney dialysis center, hospital or nursing home or nutritional or socialization services such as a senior center should be marked "In" or "Out" for Item 7-1 (Highly Susceptible Population). For more information see marking instruction.

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- IV. Are Items 5-1 A and 9-2 marked to correspond with the Risk Type identified within Header?* Mark 'YES' only if both 5-1A and 9-2 are marked correctly. Mark 'NO' if either 5-1 A or 9-2 or both are marked incorrectly.
- iii. An inspection addendum report is completed with clear, legible, and concise and accurately records findings and observations (4 elements)
 - I. ** Flag for further assessment: Are Specific Descriptive and Legally -Binding Observations Noted? For example instead of documenting "the plates were found soiled", the EHS documents "the food contact surfaces of the plates stored at the self-service buffet were soiled with what appears to be dried food debris". Another example of non-descriptive language would be, "employees not wearing gloves". Instead more descriptive, legally-binding documentation should read, the food service employees were observed preparing deli with their bare hands". This would be a better observation and legally-binding because this statement would paint a mental picture of what was observed. In this way, observations will be more effective in describing the conditions observed. Likewise, it will easily help the EHS to recall subsequent and pertinent information concerning the violation as needed during any pending action in regards to the establishment.
 - II. Are Items 5-1A, 5-1B, 6-1A, 6-1B, and 6-1C Marked to Correspond with Observed temperature? (These temperatures should be noted on addendum sheet temperature chart to identify a corresponding temperature to the Items marked in compliance and out of compliance.)
 - III. Do the Observations Documented Match the Violations Bubbled in on the Inspection Report? For instance, if an Item 2-2A is marked on the Inspection Report, an observation that corresponds to an item 2-2A violation is documented on the Addendum Report.
 - IV. <u>Is Justification Provided for Temperatures that Appear to be out of Compliance?</u> For example, meat loaf is documented at 110 degrees Fahrenheit. A note should be made that the meat loaf is cooling and within the 2 hour cooling time frame to reach 70 degrees Fahrenheit; otherwise, it may appear that this should have been marked as a temperature violation. Mark Not Applicable if justification is not warranted for temperatures recorded during the

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- inspections (ex. all temperatures below 41 degrees F or above 135 degrees. F)
- V. ** Flag for further assessment: Is Immediate Corrective Action
 Bubble in on Inspection Report or Noted on the Addendum
 Sheet?
- iv. Proper code provisions cited for CDC-identified risk factors and Chapter 290-5-14 interventions (3 elements)
 - I. ** Flag for further assessment: Were the Proper Code Provisions of Risk Factors for Public Health Intervention (RF/PHIs) and Good Retail Practices (GRPs) as it Pertains to Chapter 290-5-14 Cited? Please Refer to Marking Guide Instructions.
 - II. Do Follow-up Marking Correspond with Inspection Score and Falls Within the Time Frame? For example, if a prior or last grade of "U" is observed on the inspection report, the inspection that followed the prior or last inspection (in the Inspection Report Header) should have occurred within 10 days of the establishment receiving the grade "U". Mark Not Applicable if a follow-up inspection was not warranted (ex. prior or last score is not a grade of U with a score of 69 or below).
 - III. ** Flag for further assessment: Is repeated violation Noted as Required? Review past inspection findings to assess the EHS' reporting in regards to repeated or unresolved violations. For example, a Repeat (R) should be bubbled in for repeat violations of the same provision for routine inspections and follow-up inspections; however, a violation observed for the first time on a follow-up inspection would not be considered a repeat.

4. Evaluation:

- (a) Each districts' performance evaluation will be based on the review of inspection reports of food service inspectors within their respective district. The tool that will be used for districts to determine the number of inspections to review per inspector during each assessment period is as follows:
 - i. 4 or more food service inspectors = 4 inspection reports per inspector
 - ii. 3 or fewer food service inspectors = 5 inspection reports per inspector

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- (b) These numbers are based on the FDA standard 4. The FDA assessment was based on 2 inspections per inspector both file review and field inspection and was conducted once every 3 years. **This assessment, however, uses 4 reviews to compensate for the file-review only approach and an assessment per every 6 months.** Selection of inspection reports for review will be based on simple random sampling.
- 5. ***Selection of Inspection Forms: For districts that currently submit reports into the Digital Health Department (DHD) system, four (4) inspection forms (see Subsection C 4. (a) i. entitled, "Evaluation", for districts with less than 4 inspectors) will be randomly selected for review from DHD system based on the number of reports per inspector (identified above in Evaluation section) for each assessment period. For districts that do not report into DHD system, hard copies of four (4) inspection reports will be randomly selected for review per an inspector (see Subsection C 4. (a) ii. entitled, "Evaluation", for districts with less than 4 inspectors). The inspection forms randomly selected for review must be inspections that were conducted within the 6-month assessment period. For instance, an inspection report for review for July –Dec 2011 should actually be conducted within July Dec 2011.

6. Assessment Form:

- (a) An electronic assessment form entitled, "Districts Uniform Inspection Program", will be used by districts to submit the review of EHS food service inspections within their districts. See "Appendices A" at the end of this Section for an example of this Form.
- (b) All District Uniform Inspection Program Assessment Forms must be completed and electronically entered into the State Environmental Health Office's designated website no later than the end of the second work-week of the 6th month of each assessment period. One submission is required for each inspection report. Each field on the form is required to be filled in with yes, no, or not applicable as indicated by each question or statement on the form. Each form must be complete with all fields filled-in as required by instructions listed on the form.
- (c) There are performance elements within the assessment protocol that are marked with double asterisks (**) to alert the District Standard-Trainer and the District Environmental Health Director that in-field assessments of EHS conducting food service risk based inspections may be warranted for performance below the benchmark of 75% within those areas. For the

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purpose of ensuring that the number of reports reviewed for each EHS is consistent with this protocol and to ensure statistical significance, an employee ID has been provided. Districts are to give numbers to the food service EHS and select from the drop down at the Employee field the number that corresponds to a particular food service EHS. A link to the form will be sent to each district for the districts to use.

- 7. <u>Corrective Action</u>: District Environmental Health Directors will provide support to District Standard-Trainers in their efforts to increase the frequency of EHS agreement with state standardization protocols through training, field assessments, and District Standard-Trainer's mentoring of EHS. District evaluation of state assessment reports and response to findings of said reports will be an alternating, repeating process of self-assessment to initiate responses to reports and then, repeat the self-assessment process.
 - (a) <u>Training</u>: Upon receiving assessment reports and during the first month of each 6-month assessment period, districts will evaluate assessment reports compiled by the State Environmental Health Office. District Environmental Health Directors and Standard-Trainers must be prepared to address any state standardization and food service establishment risk-based inspection protocol and policy nonagreement trends and to share any successful agreement trends with EHS. The following are suggested methodologies to fulfill this training responsibility by districts:
 - i. <u>District Meetings</u>: Regularly scheduled district meetings can be held where assembled EHS are made aware of findings of self-assessments conducted during the previous 6-month assessment period. Together with District Standard-Trainers and District Environmental Health Directors, EHS can work to find solutions to overcome difficulties they may be experiencing while conducting food service inspections. Incorrect EHS assumptions in following protocols may be identified and District Standard-Trainers can provide retraining to correct these EHS misassumptions. In addition, districts can request that State Environmental Health Office's Food Program Standard-Trainers provide assistance to their Standard-Trainers with training of EHS. The State Environmental Health Office will provide training assistance on a first-come-first-served basis and as time and scheduling will allow.
 - ii. <u>State Food Service Training</u>: Districts will make every effort to allow EHS to attend food safety training provided by the State Environmental Health Office or by an agency sponsored by the State Environmental Health Office.

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- (b) Individual EHS In-Field Assessments: Based upon the frequency of occurrence of double-asterisked marked (**) performance elements (as identified on the electronic assessment form) falling below the benchmark of 75% on reports prepared by the State Environmental Health Office, District Standard-Trainers will observe EHS assessments of food service establishments during food service inspections in the field. The number of field observations will be that necessary to completely identify the cause of the nonagreement with state standardization and inspection protocols. In addition, the number of EHS field observations must be sufficient to direct the formulation of a workable solution to bring about agreement with established state protocols by all EHS staff assigned food service program duties and responsibilities within the district.
- (c) Mentoring of EHS: District Standard-Trainers are expected to mentor EHS as they prepare to become Standardized Food Service Establishment Inspection Officers. They are expected to take the lead in providing in-the-field training in food service inspections. If necessary due to workload assignments, they are responsible for working with management to find a standardized EHS with at least 5 years of food service inspection experience to assist them with mentoring EHS in their preparation for standardization for the first time. Further, in-the-field assessments will be the District Standard-Trainers opportunity to provide mentoring for EHS to correct any misconceptions and/or misunderstandings of state standardization and risk based inspection protocols and that of Chapter 290-5-14.
- D. <u>State Environmental Health Office District Assessment Processing and Reporting:</u> <u>Verification Assessment; and Reporting and Corrective Action Protocols:</u>
 - 1. State Environmental Health Office District Assessment Processing and Reporting:
 - (a) Scoring: For District Self-Assessments evaluated by the State Environmental Health Office, the statistical benchmark performance rating for each of the twenty-two (22) individual performance elements is 75% or above. An individual performance element receives a passing score if at least 75% of the instances of observation are completed in a satisfactory manner. The 75% per item rule was determined by the consensus of several highly experienced individuals working in the FDA/CFSAN retail food safety team who formulated FDA Standard 4. Scores for each of the 22 individual elements will be compiled after which, the overall score for the district will be computed from the average of the scores of the 22 individual elements. The score for each of the 4 items will also be computed based on the 75% per item rule.

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- (b) Reporting: The State Environmental Health Office will prepare and send out assessment reports to District Standard-Trainers with copies to the District Environmental Health Directors. Assessment reports will be sent out to districts during the first workweek of each 6-month assessment period. In order for these reports to be sent out, all the required inspection reviews for all EHS conducting food service inspections in submitting districts must be sent, as stated within a previous Subsection C 6 entitled, "Assessment Form", to the State Environmental Health Office.
- 2. <u>Verification Reporting</u>: During the first month of each year, the State Environmental Health Office will examine self-assessment reports containing food service establishment inspection report data submitted by districts for the previous year. Elements for examination are frequency of occurrence of EHS nonagreements verses agreements with standardized food service inspection protocols as compared to the frequency of occurrence of risk factors for foodborne illness and good retail practices. From these district self-assessment reports, a general report will be generated to reflect the statewide strengths and weaknesses of the standardization piece of the food service program. From this general report, the following opportunities to improve the food service program should be available to decision-makers:
 - (a) To obtain data that will assist decision-makers in making determinations regarding areas to focus efforts and resources.
 - (b) To identify practices and policies at the State level that appears to be "working" (i.e. having the greatest impact in achieving conformance based on the performance indicators) so that these practices and policies can be shared with public health districts.
 - (c) To generate data that may influence the development, implementation, and/or improvement of the policy and procedures within the food service program.

3. Corrective Action:

(a) <u>Training</u>:

(1) <u>District Standard-Trainers</u>: At least once per year, a statewide District Standard-Trainer Educational Seminar will be hosted by the State Environmental Health Office's Standard-Trainers. The purpose of this Educational Seminar will be to keep District Standard-Trainers up-to-date on state standardization protocols and to allow them to share their successes in standardized food service establishment inspections. In addition, this educational seminar will allow State Standard-Trainers to share information concerning the food service/food safety program.

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- (2) <u>County EHS</u>: At least once per year, the Environmental Health Office will host three training programs to be offered to EHS: the food service establishment inspection pre-standardization module; the food service plan review module; and the foodborne illness environmental assessment module. Districts are encouraged to allow EHS to attend these courses as part of their EHS standardization training and re-training methodologies. However, all EHS must either successfully complete the food service establishment inspection pre-standardization module or they must successfully complete FDA ORAU online food safety modules and demonstrate competency in knowledge of the current state food service rules and regulations before they will be allowed to be standardized.
- (b) Mentoring of District Standard-Trainers: State Environmental Health Office Standard-Trainers are expected to mentor EHS, who are designated by their District Environmental Health Director, as they prepare to become Standardized Food Service Establishment Inspection and Training Officers. They are expected to take the lead in providing training and guidance in food service standardization protocols, policies and procedures. Further and if necessary, they are expected to provide assistance to District Standard-Trainers during district meetings to correct any misconceptions and/or misunderstandings of standardization and risk based inspection protocols and that of Chapter 290-5-14.
- (c) Standardization and Food Service Inspection Protocol Review: At a minimum during the 1st month of each year, State Environmental Health Office Food Service Unit Management and Standard-Trainers will review and examine the general report prepared from district data collected during the previous year. The purpose of this review and examination will be two fold. First, it will be used to identify practices, policies, and protocols at the State level that appear to be "working" (i.e. having the greatest impact in achieving conformance based on the performance indicators and that on reduction of risk factors for foodborne illness) so that successful practices, policies, and protocols can be shared with public health districts. In addition and should practices, policies, and protocols be found lacking in their effectiveness to regulate standardized food service establishment risk-based inspections, the review and examination process will be used to make modifications to current established practices. policies and protocols to improve their effectiveness. Secondly, it will be used to generate data that may influence the development, implementation, and/or improvement of practices, policies, and protocols within the state food service program itself.

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APPENDICES A

DISTRICTS UNIFORM INSPECTION PROGRAM

Please fill this form completely. All fields are required. For questions or problems, please contact the State Office of Environmental Health at 404-657-6534. Thanks! Note: ** Flag for further assessment

* Required
District * Please select your district
Number of Inspectors in the District * Select the Total Number of Inspectors with Food Service
Responsibilities in Your District
Assessment Period * Please indicate the period from and to for this assessment
Inspector ID * Please indicate the ID # of the inspector Northwest (Rome)
Item 1 – Header:
1.1. Establishment Name Recorded? * Check 'Yes" if establishment name was recorded and 'No' if establishment name was not recorded.
• Yes
• No
1.2. Establishment Address Recorded? * Check 'Yes" if establishment address was recorded and 'No' if establishment address was not recorded.
• Yes
• No
1.3. Permit Number Recorded? * Check 'Yes' if permit number was recorded and 'No' if permit number was not recorded.
• Yes
• No
1.4. Date Recorded? * Check 'Yes' if date of inspection was recorded and 'No' if date of inspection was not recorded.
• Yes
• No

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1.5. Certified Food Safety Manager (CFSM) Information Provided? * Check 'Yes' if CFSM is identified. Also, check "Yes" if the missing CFSM information corresponds with a 1-2 violation or the establishment is identified as being within 90 day permit issuance. Check 'No' if CFSM was not identified or no information provided.				
•	0	Yes No		
	-	se of Inspection Indicated? * Check 'Yes' if purpose of inspection was bubbled if the purpose of inspection was not bubbled in.		
•	0	Yes No		
		be Indicated? * Check 'Yes' if risk category was identified on the form and 'No' if risk s not identified.		
•	0	Yes No		
had bee	n re	Recorded? * Check 'Yes' if applicable score (last, prior, and previous scores with dates) corded and 'No' if applicable score had not been recorded. Check 'Not Applicable' if the ection is a preliminary inspection; whereas, the last, prior, and previous scores would not		
•	0	Yes No		
1B viola and 4-2	itions A vic	ed Scoring Tallied to Correspond with the Subcategory? * For example, Item 3-1A and 3-s should result in 9 points being debited from score rather than 18 points. However, 4-1A plations would result in a total of 13 points being debited from the score. Mark Not no debited scoring was made during the inspection (ex. current score 100).		
•		Yes No		
•		Not Applicable		
of inspe	ction	n/Time Out Recorded? * Check "Yes" if there is a lapse in time between the start and end a. Check "No" if the start and end time f inspection were not recorded OR if there is no en the start and end time of inspection.		
•	0	Yes No		
Item 2 -	- Do	cumentation of Compliance Status:		

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2.1 Did the EHS document the compliance status for each Risk Factor for Public Health Intervention (RF/PHI) * (i.e. IN compliance, OUT of compliance, Not Observed, or Not Applicable)?	
• Yes	
• No	
2.2. Has the EHS followed the Marking Guide Instructions for when to mark an "NA " or "NO" for Item in the RF/PHI section? * Items 1 through Item 9.	S
• Yes • No	
** 2.3. Flag for further assessment: Is Item 7-1 Marked to Correspond with establishments that serve Highly Susceptible Population (HSP)? *	а
• Yes	
• No	
**2.4. Are Items 5-1A and 9-2 Marked to Correspond with the Risk Type Identified within Header? * Mark 'YES' only if both 5-1A and 9-2 are marked correctly. Mark 'NO' if either 5-1A or 9-2 or both are marked incorrectly.	
Yes No	
Item 3 – Clear, Legible, Concise and Accurate Report of Findings:	
**3.1. Flag for further assessment: Are Specific Descriptive and Legally -Binding Observations Noted * For example, instead of documenting 'the plates were found soiled' the EHS documents 'the food contact surfaces of the plates stored at the self-service buffet were soiled with what appears to be dried food debris' Mark Not Applicable if no observations were made during the inspection (ex. currer score 100).	
• Yes	
No Not Applicable	
• Not Applicable	
3.2. Are Items 5-1A, 5-1B, 6-1A, 6-1B, and 6-1C Marked to Correspond with Observed temperature? These time/temperatures should be noted on addendum sheet time/temperature chart to identify a corresponding temperature to the Items marked in compliance and out of compliance. Mark Not Applicable for rare instances in which temperatures were not taken during the inspection.	*

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		_
•	Yes No Not Applicable	
exampl	ne Observations Documented Match the Violations Bubbled in on the Inspection Report? * For if an Item 2-2A is marked on the inspection report, an observation which corresponds to an a violation is documented on the report addendum.	or
•	Yes No Not Applicable	
meat lo cooling appear justifica	stification Provided for Temperatures that Appear to be out of Compliance? * For example, is documented at 110 degrees Fahrenheit. A note should be made that the meat loaf is not within the 2 hour cooling time frame to reach 70 degrees Fahrenheit; otherwise, it may not this should have been marked as a temperature violation. Mark Not Applicable if on is not warranted for temperatures recorded during the inspections (ex. all temperatures degrees F or above 135 degrees. F).	
•	Yes No Not Applicable	
Risk Fa assistar Check ' Also, ch (RF/PH .10(2)(i) Correct	ag for further assessment: Did the EHS document on-site corrective action for out-of-control cors at the time of inspection as appropriate to the type of violation (see Rule .10(2)(i)13. for the in assessing timely correction of Risk Factors/Public Health Intervention Categories)? * the Immediate Corrective Action is Bubbled In and noted on the Inspection Report. ck "Yes" if the Addendum Sheet identifies how the Risk Factors for Public Health Intervention will be addressed and a time frame for completing this is identified complies with Rule3. if the RF/PHI was not corrected during the inspection. Mark Not Applicable if Immediate the Action was not warranted during the inspection (ex. no Risk Factor for Public Health on (RF/PHI) violations were noted on the inspection report).	
•	Yes No Not Applicable	
Item 4	Proper Citation of Legally Binding Provisions:	
Public I Please	ag for further assessment: Did the EHS cite the proper code provisions for Risk Factors for ealth Intervention (RF/PHIs) and Good Retail Practices (GRPs) based on Chapter 290-5-14? efer to Marking Guide Instructions. Mark Not Applicable if it was not necessary to cite any visions during the inspections (ex. current score 100).	*

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•	0	Yes
•	0	No
•		Not Applicable
Unsatisf with the inspection Header) the current from the	time on re sho ent g	for grade, last grade, or current grade on the Inspection Report was a "U" for ary, was the Follow-up section bubbled in "Yes" and did the Follow-up Date correspond a frame within the Chapter? * For example, if a prior or last grade of "U" is observed on the eport, the inspection that followed the prior or last inspection (in the Inspection Report and have occurred within 10 days of the establishment receiving the grade "U". Likewise, if grade is a "U", the Follow-up bubbled should be filled in and a date not to exceed 10 days are of inspection should be documented. Mark Not Applicable if a follow-up inspection was ad (ex. prior or last score is not a grade of U with a score of 69 or below).
•	0	Yes
		No
•		
•		Not Applicable
inspection example inspection inspection time on necessary	on file, a fons a cons ons ons ons ons ons ons ons ons ons	for further assessment: Are repeated violations noted as Required? * Review past andings to assess the EHS' reporting in regards to repeated or unresolved violations. * For Repeat (R) should be bubbled in for repeat violations of the same provision for routine and follow-up inspections (an illustration of when to mark repeats based on follow-up can be found in the Marking Guide Instructions); however, a violation observed for the first low-up inspection would not be considered a repeat. Mark Not Applicable if it was not be cite any repeat violations during the inspections (ex. prior inspection report did not record tions that were found on the current inspection report).
	0	Yes
•	0	
•		No
•		Not Applicable
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