

# Virtual Inspections

## Key Questions and Decisions



During events such as the COVID-19 pandemic when social distancing and reduction or elimination of in-person inspections is necessary for public health reasons, it is generally understood that inspection frequencies will not be achieved due to the significant amount of lost work and time. While food safety inspectors are essential employees, they should not be considered as critical infrastructure until situations arise that would affect public health including foodborne illnesses.

A program's goal should be to find effective uses for inspection staff that assist staff in improving their skills, assist the industry through education or technical assistance, or improve the food safety program.

AFDO does not endorse any of these activities, but this document is meant to provide information to programs considering virtual inspections.

- 1) Types of Facilities and Inspections That Can Be Completed Through Virtual Inspections
  - a. Retail Foods
    - i. All virtual inspections should verify contact information and in particular verify and document e-mail addresses, leadership mobile phone numbers, and emergency contact information.
    - ii. Pre-Opening, Licensing Inspections
      - Requires establishment to have a phone or tablet with video and audio capabilities and an agreed-upon application.
      - Consider adding a disclaimer to the report, that the preopening inspection was conducted via a virtual inspection and not everything may have been seen, and deficiencies identified during the establishment's first routine inspection will also need to be corrected.
      - If the inspector cannot view everything necessary to determine if the operation would be safe, consider not approving and requiring an in-person visit.
  - ii. Complaints
    - May require the establishment to have a phone or tablet with video and audio capabilities and an agreed-upon application.
    - Interviews of the operator can be conducted over the phone or via video conference. Seek photos or other documentation (such as invoices, temperature logs, etc.) that can assist in determining if the complaint is founded.

### iii. Follow-Up

- May require the establishment to have a phone or tablet with video and audio capabilities and an agreed-upon application.
- Seek documentation to show the item has been corrected such as photos, invoices, policies, etc.

### iv. Active Managerial Control (AMC) Inspections

- Requires establishment to have a phone, tablet, or computer with video and audio capabilities and an agreed-upon application. The application would need to allow sharing of documents, such as policies or procedures or other methods to share documents such as "Google Drive" which may need to be established.
- Review key policies and procedures. Review records and discuss verification or performance.
- Discuss areas for potential improvement.
- Must be scheduled with management-level personnel.
- Determine what type of firms you want to focus on, i.e. small chains vs. independent establishments.
- See Oregon phone-based tools.
- Potential tools and resources:
  - <http://www.miottawa.org/health/ochd/pdf/activemanager.pdf>
  - <https://health.mesacounty.us/wp-content/uploads/2018/07/AMCSelfAssessment-ChecklistFact-Sheet.pdf>
  - <https://www.fairfaxcounty.gov/health/sites/health/files/assets/documents/pdf/amc-toolkit.pdf>

### v. Food Safety Check

- Requires establishment to have a phone or tablet with video and audio capabilities and an agreed-upon application.
- The program will need to determine whether or not this would count as a routine inspection.
- Focuses on the key risk factor and public health intervention, including COVID-19 operations and changes in operation because of COVID-19.
- Uses video to verify things such as temperatures, employee hygienic practices, storage practices, etc.
- Must be scheduled in advance, perhaps voluntary.
- See South Carolina example.
- Key question for the program: How will this activity be counted?
- Likely requires a modified form in data system, new low-tech form such as fillable PDF, or use of routine inspection form largely not observed checked and comment in the notes section about this not being a complete routine inspection.

- Determine what type of firms you want to focus on, i.e. small chains vs. independent establishments.
- Consider providing special recognition to establishments that choose this option and appear to be in substantial compliance. Perhaps a placard for their window or recognition on the agency's website.

vi. Operation Check-In and Educational Opportunity

- Requires a phone at a minimum. Could be conducted using webinar tools such as WebEx.
- Consider discussing key areas for COVID-19 protective actions:
  - How are you maintaining social distancing?
  - How have you limited operations?
  - What are you doing differently?
  - Do you have staff in new roles during this situation? What roles? How are you training them for the new roles (i.e. New people in the kitchen)?
  - What problems are you having (troubleshoot how to improve these challenges)?
  - How are you monitoring employee health? How have you trained your employees about symptoms of COVID-19?
  - Are you requiring cloth-face coverings or other PPE for all employees?
  - Have you changed ingredients or product sourcing? If so, have you verified they are an approved source?
- Maybe scheduled the operation check-in in advance.
- Perhaps make them voluntary initially.
- Determine what type of firms do you want to focus on. i.e. Small chains vs. independent establishments.
- Consider providing handouts and guidance information via email.
- Must determine how to record the activity.

b. Manufactured Foods

i. Pre-Opening

- Requires establishment to have a phone or tablet with video and audio capabilities and an agreed-upon application.
- Consider adding a disclaimer to the report, that the preopening inspection was conducted via a virtual inspection and not everything may have been seen, and deficiencies identified during the establishment's first routine inspection will also need to be corrected.
- If the inspector cannot view everything necessary to determine if the operation would be safe, consider not approving and requiring an in-person visit.

- ii. Food Safety Check—More Interview
  - Review of COVID-19 process.
  - Review of operational status.
  - Review of key contact information.
  - See Minnesota example.
  - Similar to Retail Food Safety Check.
  
- iii. Other Potential Activities—Food Safety Plan Reviews
  - Much of the time associated with a preventive controls inspection is conducting a review of the Food Safety Plan's components and the firm's procedures for addressing hazards that they have identified.
  - Many firms are concerned about providing their food safety plans outside of the facility due to the confidential and proprietary information that they contain.
  - Depending on your statutory authority, you may be able to require that these records be provided for your review.
  - These concerns may be able to be mitigated by using software that allows the regulatory program to view the document, but not download or copy it, thus allowing the firm to control the dissemination of their sensitive documentation while meeting the agency's regulatory needs.
  - Consider reviewing key areas of the food safety plan:
    - Hazard Analysis
      - i. Food Safety Hazards
    - Process Controls
    - Sanitation Controls
    - Allergen Controls
    - Supply Chain Controls
    - Verification Procedures
    - Exemplars of Records Being Maintained
    - Recall Plan
  - Consider conducting a review of complaints received by the firm over the last year.
  - Consider conducting a label review for several of the firm's most popular (highest volume) products.
  - The report will likely have to be somewhat customized given the more administrative focus of the review.
  - Completing this portion of the inspection now will allow for a much more facility and process-focused onsite inspection when normal inspection activities are able to be resumed.

## 2) Technology for Virtual Inspections

- a. Telephone
- b. Camera virtual meeting software examples include:
  - i. GoToMeeting

- ii. FaceTime
  - iii. Google Hangouts
  - iv. WebEx
  - v. Skype
  - vi. Zoom
    - Could be used through FoodSHIELD for free
  - vii. Adobe Connect
  - viii. Other applications
- c. Establishment must have access to technology (phone service, internet, software.)
  - d. Inspector must have software, understand using the software, and have adequate bandwidth to support software. Inspector should be performing the virtual inspection in a private area to avoid potential disclosure of confidential information.
  - e. Choose a tool appropriate to what you have to do?
    - i. Do you need to share screens or documents during the discussion?
    - ii. If internet is challenging in the area, you may want to use a service with a phone option?
  - f. During the introduction to the virtual inspection with the inspector and the firm, the inspector should indicate what will happen if the session is disconnected and how it will be restored.

### 3) Capturing Data From Virtual Inspections

- a. For pre-opening inspections, the current inspection form may be used with a notation that the inspection was conducted virtually and a disclaimer that additional corrections may be required during the first routine inspection.
- b. For complaints, the current inspection form may be used with a notation that this was conducted virtually. An in-person follow up may need to be scheduled later if the information cannot be fully verified.

### 4) Additional Things to Consider With Virtual Inspections

- a. Inspections will need to be scheduled.
- b. For food safety checks and AMC type inspections, consider asking for volunteers.
- c. Determine how the activity will be recorded in the data system.
- d. Scripts should be developed for inspection staff to verify consistent coverage of topics.