

Conducting Remote Inspections During the COVID-19 Emergency

Contents

Purpose.....	1
General.....	1
Phase 1.....	2
Remote Routine Inspections.....	2
Remote Modified Complaint Inspections.....	2
Remote Licensing or Planning Inspections.....	3
Remote Follow-up Inspections.....	3
Phase 2.....	3
Phase 3.....	3
Remote Inspection Procedures.....	4
Video Platform.....	4
During the Inspection.....	4
Remote Routine.....	4
Remote Modified Complaint.....	5
Remote Licensing.....	5
Remote Follow-up.....	5
Completing the Inspection.....	5
Talking points for setting up a Remote Inspection.....	6
Blast Email Notice.....	8

Purpose

During this unprecedented time, KDA-FSL must use all available resources to assist our industry stakeholders to provide safe products as an essential function for the citizens of Kansas. Remote presence is one tool that can assist with that goal.

General

- **Do not conduct physical routine inspections until further notice unless directed otherwise directed for specific cases.**
- **Routine Inspections or any other “visit” should be conducted using the Remote Inspection procedure unless the operator does not have the necessary technology or as directed for specific cases.**

- Refer any medical or quarantine questions regarding COVID-19 to KDHE and provide the KDHE Isolation and Quarantine Release Guidance https://www.kdheks.gov/coronavirus/toolkit/Isolation_and_quarantine_guidance.pdf
- General guidance about COVID-19 and food <https://www.fda.gov/food/food-safety-during-emergencies/food-safety-and-coronavirus-disease-2019-covid-19> and www.agriculture.ks.gov/fsleducation

DO NOT WORRY ABOUT NORMAL INSPECTION PRIORITIES DURING THE COVID-19 EMERGENCY.

- Use the Inspection Reason of Remote – Phone Only document facilities that are only contacted by phone.

Phase 1

During Phase 1, the following inspection activities will occur remotely unless authorized by Program Management.

1. Remote Routine Inspections on request of the Food Establishment (FE) operator
2. Remote Modified Complaint Inspections
3. Remote Licensing and Planning Inspections
4. Remote Follow-up Inspections

All types will be conducted using the processes in Remote Inspection Procedures

Remote Routine Inspections

- Remote Routine Inspection visits will be non-regulatory, educational, and compliance-assistance oriented. An email will be sent to FEs with email addresses in USAFoodSafety inviting them to request a Remote Routine Inspection. The email will direct them to contact the new KDA.RemoteInspection@ks.gov email.
 - Requests will be assigned to inspectors by the student workers. Student workers will email the assigned inspector and will create a Due List task with the Inspection Reason of Remote – Food Safety Check.
- When you receive a request, call the operator to set up the remote inspection. Offer help with any questions or immediate concerns they may have.
 - **Use the process in Talking points for setting up a Remote Inspection to set up the remote visit.**
- Schedule Remote Routine Inspections during times when the operator/PIC will have time to discuss the food safety issues observed. Do not schedule remote visits during peak times like lunch or dinner prep unless the operator requests that time.
- FEs that do not have the necessary technology for a remote visit will be deferred until social distancing practices can be lessened in Phase 3.

Remote Modified Complaint Inspections

For types of complaints where remote inspection or screening can be adequate, such as bare hand contact, dirty facilities, and pests, call the operator, inform them of the type of complaint received, and offer a remote inspection. (Disclosing the nature of the complaint allows them to take necessary corrective action timely to prevent further risk to the public.) This allows us to minimize the risk of COVID-19 transmission while still allowing an adequate assessment of the complaint issues. **Use the process in Talking points for setting up a Remote Inspection to set up the remote visit.**

Remote Licensing or Planning Inspections

When a licensing or planning inspection is assigned, **Use the process in Talking points for setting up a Remote Inspection to set up the remote visit.**

Remote Follow-up Inspections

When a follow-up is due and the issues for follow-up allow remote inspection or screening to be adequate, such as facility/equipment issues, many temperature issues, HACCP process/plan/records issues, and pests, call the operator and offer a remote inspection. This allows us to minimize the risk of COVID-19 transmission while still allowing an adequate confirmation of the compliance status. If they accept, **use the process in Talking points for setting up a Remote Inspection to set up the remote visit.** If they decline, contact your DM to re-schedule the follow-up inspection for an additional 30 days.

Phase 2

During Phase 2, the only change will be that we will call individual licensees to offer Remote Food Establishment (FE) Routine Inspections.

- Perform requested Remote Routine Inspections first.
- After all requested Remote Routine Inspections are completed, call your Category I (High-risk) FEs and talk with the owner or the person in charge. Offer assistance with any questions or concerns they may have and discuss the benefits of a Remote Routine Inspection, along with the possibility of a date/time to conduct one. If a facility declines a remote inspection, discuss the COVID-19 issues we can assist with (meaning employee health policies, high touch area sanitation, service options, social distancing) by phone and let them know they can call us for assistance as needed. Direct them to our website for the latest information.
 - Use the Past Due to select facilities to call to try to arrange Remote Routine Inspections but focus on facilities that will more likely need assistance. Often operations that are not chain/franchise will need more guidance in dealing with employee health, hygiene, sanitation of high touch areas, social distancing, and food safety challenges that changing operations may bring.

Phase 3

Once social distancing restrictions are lessened, and physical site visits are approved, we will resume on-site Routine Inspections and other inspection activities. Remote techniques may be employed for certain follow-up inspections and for licensing/planning inspections.

Remote Inspection Procedures

Video Platform

The only Video Platform that KDA-FSL can use is Zoom. Zoom is generally easy to use. The KDA Zoom account can be used to set up calls quickly and can be accessed by the operator on a browser. Using Zoom does not require the operator to set up an account, which is free, but it may be easier if they agree to do so.

Downloading the Zoom app is recommended, but the operator may participate directly from the browser if they prefer. During COVID-19 emergency, Zoom has waived the 45-minute limit per session, but a warning may still pop up. You may dismiss that warning.

When scheduling the inspection, call the facility contact to schedule the inspection time and confirm that Zoom will be used. During the scheduling call tell the contact the following are needed for the remote inspection:

- Internet connection (Wi-Fi or Cellular)
- A device with a camera that can move through the facility (phone, tablet, laptop, etc.)
- Proper Thermometers for Checking the cold holding units, hot holding units, representative food temperatures (if food is present), and water temperatures.
- Sanitizing test methods (chlorine or quat strips or method for other sanitizers)
- Pre-submission of a menu or foods list (Licensing/Planning only)

After the scheduling phone call, send an email that:

- Confirms that Zoom will be used as the video conferencing platform
- Confirms the inspection date and time.
- Lists the needed items.
- Informs the contact an inspection report will be emailed after the inspection and that they will need to reply with "I acknowledge that I have received this report."

During the Inspection

Direct the contact to show you the areas that you need to observe. This will be as similar as possible to physical inspection.

Remote Routine

- Concentrate remote observations on the following items:
 - Employee Health policies
 - Hand Hygiene
 - Proper glove use
 - Frequent cleaning of high touch areas, such as refrigerator handles, microwave doors, countertops, etc.
 - Holding temperatures
 - Cooling temperatures
 - Cooking temperatures
- Additional observations should include:
 - Checking hot water temperatures at sinks.
 - Testing the warewashing unit for sanitization.

- Any apparent violative conditions should be corrected during the remote visit. If pests are observed, discuss the needed corrections and schedule another remote visit to follow up. Tell the operator that you need to consult with your supervisor before finalizing the inspection. Notify your supervisor to assess whether on-site inspection is warranted. Notify Program Management to determine if next Routine will be pushed back.
- Use the Inspection Reason Remote – Routine to document these remote visits.

Remote Modified Complaint

- Address the items in the complaint.
- Any apparent violative conditions should be corrected during the remote visit. If pests are observed, discuss the needed corrections and schedule another remote visit to follow up. Tell the operator that you need to consult with your supervisor before finalizing the inspection. Notify your supervisor to assess whether on-site inspection is warranted.
- Use the Inspection Reason Remote – Modified Complaint.

Remote Licensing

- Evaluate the facility and the procedures based on the food list or menu submitted. Have the operator demonstrate using:
 - Proper thermometers for checking the following temperatures:
 - Cold holding units
 - Hot holding units
 - Cold and hot food
 - Water temperatures
 - Sanitizing test kits for warewashing units.
- Refer to the Licensing Guides. Any apparent violative conditions must be corrected during the remote visit for the status to be changed to Licensing Inspection Passed. If pests are observed, discuss the needed corrections and schedule another remote visit to follow up. Tell the operator that you need to consult with your supervisor before finalizing the inspection. Notify your supervisor to assess whether on-site inspection is warranted.
- Use the Inspection Reason Remote – Licensing.

Remote Follow-up

- Evaluate the issues from the initial inspection. If the items are in compliance, no further action is needed. Use the Inspection Reason Remote – Follow-up.
- If the items are non-compliant and can't be corrected during the remote inspection, do not issue an inspection report. Tell the operator that an onsite visit is required to close out the follow-up after restrictions are eased. Add a note in License Maintenance describing the conditions. The remote visit will be included in the final follow-up inspection report's visits record.

Completing the Inspection

Make any appropriate notes about observations in USAFoodSafety. Record the times under Inspection Visit. Choose Unavailable for the No Signature Reason. Send the inspection report via email to Owner/ PIC. Request the Owner/PIC reply with an email including "I acknowledge that I have received this report." (Do not send an inspection report for Remote – Follow-up inspections with ongoing non-compliance.)

Talking points for setting up a Remote Inspection

1. Inspection Reason-specific Information

- a. Remote Routine Inspection – Thank the operator for requesting a remote routine inspection. Explain again that the purpose of the remote routine inspection is to assist businesses with taking the precautions needed to prevent the spread of COVID-19 while maintaining food safety practices. Our staff are not able to conduct onsite routine inspections at this time, but we can conduct these focused remote routine inspections utilizing a variety of services including Zoom, Microsoft Teams, Skype for Business, Google Hangouts Duo.
- b. Remote Licensing Inspection – Thank the operator for agreeing to a remote licensing inspection. This allows us to minimize the risk of COVID-19 transmission while still allowing an adequate assessment of the operational status of the facility.
- c. Remote Modified Complaint Inspection – For types of complaints where remote inspection or screening can be adequate, such as bare hand contact, dirty facilities, and pests, call the operator, inform them of the type of complaint received, and offer a remote inspection. (Disclosing the nature of the complaint allows them to take necessary corrective action timely to prevent further risk to the public.) This allows us to minimize the risk of COVID-19 transmission while still allowing an adequate assessment of the complaint issues. If they accept, proceed to #2. If they decline, contact Program Management for further direction.
- d. Remote Follow-up Inspection – For types of follow-up inspections where remote inspection or screening can be adequate, such as facility/equipment issues, many temperature issues, HACCP process/plan/records issues, and pests, call the operator and offer a remote inspection. This allows us to minimize the risk of COVID-19 transmission while still allowing an adequate confirmation of the compliance status. If they accept, proceed to #2. If they decline, contact your DM to re-schedule the follow-up inspection for an additional 30 days.

2. Specify that Zoom will be used. This will likely require discussion and may require troubleshooting. Please be patient. Please test these out yourself so you can be proficient before setting up a call with an external stakeholder.

3. During the video conference remote inspection, the facility contact will need:

- Internet connection (Wi-Fi or Cellular)
- A device with a camera that can move through the facility (phone, tablet, laptop, etc.)
- Proper Thermometers for Checking the cold holding units, hot holding units, representative food temperatures (if food is present), and water temperatures*
- Sanitizing test methods (chlorine or quat strips or method for other sanitizers)*
- Pre-submission of a menu or foods list (Licensing/Planning only)

* May be needed depending on the type of complaint or follow-up

4. Once the facility contact person has determined that the items listed above will be available, schedule the date and time of the remote inspection.

5. Explain that during the remote inspection you will discuss the areas to be inspected and procedures to demonstrate. Some of the items to demonstrate will include checking hot water temperatures at sinks and testing the warewashing unit(s) for sanitization. Also explain that you anticipate that the remote inspection will take around 30 minutes to conduct but you will be available to extend that time as needed. We want to provide as much assistance as possible to help facilities get through this crisis.
6. After the check, email a copy of the check report to the facility. Tell the contact that you have “Completed” a check. The report will be posted on the KDA website for the public to view. Facility representatives are welcome to post a copy of the form in their facility or on any of their social media sites. The report will also provide links to additional information that was discussed during the visit.

Blast Email Notice

Subject:

Working Together to Ensure Food Safety During the COVID-19 Emergency

Body Text:

As a precaution to prevent the spread of COVID-19, our Kansas Department of Agriculture - Food Safety and Lodging Program (KDA-FSL) is evaluating options for conducting essential food safety operations while engaging in social distancing. We know that this is a very stressful time for the food industry. We will work together to ensure that the food customers are ordering from restaurants is safe. This The need for safe food exists just as much during this event as any other time.

The question we are facing is how to conduct food safety inspections while engaging in social distancing. Our normal routine and follow-up inspections typically do not allow for social distancing.

In response, KDA-FSL has developed an emergency procedure for conducting remote inspections instead of our regular in-person inspections. Our staff can conduct these checks using the Zoom video conferencing service. A remote visit will allow us to protect your employees by providing social distancing while conducting these important checks.

How will this approach benefit you? This process will be educationally focused on the food safety risk factors. It will provide you with a food safety checkup. We will offer compliance assistance on any observed risk factor violations during the remote visit to correct any food safety concerns. The remote visit will allow us to talk about your current operational challenges and address any new processes you may be using under the current service restrictions. After the remote visit, you will receive an inspection report that shows you have completed a remote inspection. You can post this document on your door, your social media page, or anywhere else you choose to show your customers the steps you are taking to provide them with safe food during the COVID-19 crisis.

Of course, any egregious conditions will require an on-site inspection.

You will receive the inspection report via email. These inspections will be posted on the KDA-FSL website. These remote inspections will not replace an in-person routine inspection but will move back the due date of the next scheduled, in-person routine inspection by six months.

If you would like us to conduct a remote routine inspection, please email KDA.RemoteInspection@ks.gov.