

Best Practices for Conducting Inspections During the COVID-19 Pandemic

Conducting inspections during the COVID-19 pandemic requires personnel to modify their normal routine and increase their level of safety to protect themselves and the employees of the operation they are inspecting. Inspectors should consider these tips when preparing for and conducting an establishment inspection.

Pre-Inspection

- Review Local Area's Current COVID-19 Status. Ensure state or region of the establishment has been reopened by the Governor and local authorities.
- Schedule in Advance. Consider contacting the establishment and discussing the inspection in advance of the scheduled inspection date. Given the current environment, conducting unannounced inspections may not be the most practical unless specific conditions at the establishment indicate the need for an unannounced arrival.
 - Utilize the opportunity to update basic demographic information, review foods produced at the establishment, discuss process control and sanitation procedures, and discuss the establishment's COVID-19 employee health practices.
 - o Ask if employees are screened for COVID-19 symptoms prior to work and if positive and symptomatic employees are excluded from work.
- Personal Safety. Recognize establishment operators and staff are under an unusually high level of stress in this unprecedented time. If the inspection is not a "for cause" inspection, the operator appears under extreme pressure or agitated, and you are concerned for personal safety, consider delaying the inspection.
- Discuss Safety Precautions. Advise the establishment of the safety precautions that you will be taking to limit the potential spread of the virus and protect their employees and yourself during the inspection. This might include:
 - Monitoring your health and rescheduling if you feel ill or have an elevated temperature;
 - Utilizing regular hand washing prior to and during the inspection as necessary;
 - Wearing a cloth face coveringⁱ, at minimum, during the inspection;
 - Maintaining social distancing (6 feet) to the extent possible during the inspection;
 - Sanitizing inspection equipment prior to conducting the inspection.
- Verify Safety Practices. Verify the employee safety practices the establishment has instituted and make every effort to conform to or exceed those requirements during the inspection. Ask if the establishment has any specific protective equipment that employees and visitors are required to wear.
- Discuss the Inspection Plan. Discuss the inspection plan with the establishment. Recommend limiting the number of employees that accompany you during the inspection to allow for proper social distancing.

- Cancel if Any Employees Become III. Ask the establishment to call and cancel the inspection if the operator or any of the employees become ill with COVID-19 symptoms (cough, fever, or difficulty breathing, muscle ache, loss or taste or smell, etc.) or test positive for COVID-19.
- Sanitize All Inspection Equipment. Sanitize all pens, thermometers, clip boards, laptops, cameras, and inspectional equipment prior to the inspection. Use an EPA approved sanitizer or sanitizer containing at least 60% alcohol concentration.

Inspection

- <u>Limit Inspection Personnel and Use Separate Transportation.</u> Limit the number of inspection personnel participating. If multiple personnel will be conducting the inspection, plan to drive in separate vehicles to the location and have a plan in place to maintain social distancing during the inspection.
- Call Point of Contact on Arrival. Call your key point of contact upon arrival and have them meet you outside the establishment. This will allow you to have any preliminary discussions in an open-air environment and make it easier to maintain social distancing, rather than meeting in a small office or meeting room. If you need to meet with management, arrange to do so in a conference room that will allow for social distancing (6 feet) between participants.
- Introductions. Introduce yourself and show your credentials to the operator. Avoid shaking hands or exchanging business cards.
- Personal Safety Equipment. Put on any personal safety equipment such as eye protection and cloth face coverings before entering the establishment. At minimum, a cloth face-mask should be worn. Consider wearing a lab coat or other protective covering to prevent clothing from becoming contaminated. If your program has mandated the use of any personal protective equipment (PPE), you should come prepared and be ready to utilize the PPE during the inspection. Make sure any PPE that is used during the inspection is properly disposed of or sanitized at the conclusion of the inspection. Always wash or sanitize your hands after removing PPE.
- Health Screening. Allow the operator to verify your temperature or ask questions about any illness symptoms you might have (in keeping with their employee health practices) prior to entering the establishment. Only sign health statements or attestations in accordance with your agency's procedures.
- Verify Establishment Employee Health. Verify with the operator that none of the establishment's employees recently tested positive for COVID-19 or are currently experiencing symptoms of COVID-19.
- <u>Limit Inspection Equipment</u>. Only bring equipment into the establishment that is needed for the inspection. Try to limit equipment to that equipment you can carry throughout the inspection. If you have to take more equipment than what you can carry into the establishment, attempt to store it in an area that will minimize the potential for its contamination.

- Wash Hands. Wash your hands with soap and warm water for at least 20 seconds upon entering the establishment. Consider carrying an alcohol-based hand sanitizer (at least 60% alcohol) for use during the inspection after touching frequently touched surfaces.
- Avoid Touching Frequently Touched Services. Whenever possible, avoid touching frequently touched surfaces within the establishment such as door knobs or light switches and allow the operator to open the doors or turn on lights.
- Encountering III Employees. If you encounter somebody that appears to be ill, you should take the necessary precautions to avoid that person and their work area. You may wish to ask the operator additional questions about that employee's apparent symptoms to ensure your safety. If the employee's symptoms are consistent with COVID-19, you should consider stopping the inspection and coming back at a later date to complete.
- Avoid Enclosed Areas with Others. Avoid entering small enclosed areas with other people. Ask the operator to wait for you outside of walk-in coolers or other small enclosed areas while you inspect the area.
- Modify Inspection to Reduce Potential for Disease Transmission. Consider modifying your routine inspectional practices with safety and disease transmission prevention in mind.
- Exchange of Paper or Equipment. Do not exchange paperwork, clipboards, pens, or other materials during the visit. Consider sending your paperwork to the establishment electronically and collecting any documentation from the establishment electronically (such as via e-mail). If you need to collect records from the establishment, have a dedicated file folder that paperwork can be dropped into without you having to handle it.
- Signature Collection. Programs may wish to suspend the collection of signatures on official documents during the COVID-19 pandemic. Alternatively, staff can document the date, time, and person that the record was provided to, and indicate signature was not collected due to COVID-19.
- Personal Safety. If at any time during the inspection, you feel your personal safety is at risk, immediately discontinue the inspection, leave the establishment and contact your supervisor.

Post-Inspection

- Wash Hands. Wash your hands with soap and warm water for at least 20 seconds prior to leaving the establishment.
- Sanitize Inspection Equipment. Sanitize all equipment and electronics such as cameras, cell phones, and laptops that were touched or utilized during the inspection upon arriving at your vehicle.
- Remove Protection Clothing. Remove your laboratory coat or other protective clothing covering that was worn during the inspection and place it in a bag for proper laundering or disposal as appropriate. Use sanitizing wipes or spray to sanitize shoes.

- Use Alcohol-based Hand Sanitizer. Utilize an alcohol-based hand sanitizer (at least 60% alcohol) on your hands after returning to your vehicle and completing equipment sanitation and removal of lab coat or clothing protection.
- Sanitize Frequently Touched Services in Vehicle. Sanitize frequently touched surfaces in the vehicle, such as door handles, steering wheel, keys, etc.

General Employee Best Practices

Throughout all of your daily activities, always follow the CDC guidelines for reducing the spread of the COVID-19 virus:

- Monitor Your Health. Closely monitor your health and stay home when you are not feeling well. Cover your cough or sneeze.
- Avoid Touching. Avoid touching your eyes, nose, and mouth.
- Wash Your Hands Often. Wash your hands often with soap and warm water for at least 20 seconds, especially after going to the bathroom, before eating, and after blowing your nose, coughing, or sneezing.
- Alcohol-based Sanitizer. If soap and water are not readily available, use an alcohol-based hand sanitizer with at least 60% alcohol.
- <u>Clean and Disinfect Frequently Touched Surfaces.</u> Regularly clean and disinfect frequently touched surfaces and objects.
- Wear Face Covering and Social Distance. Wear cloth face coverings when in public and maintain social distancing (6 feet apart) from others.
- Notify Supervisor If You Have Symptoms or Were Exposed to COVID-19. Immediately notify your supervisor if you develop symptoms, have been exposed to COVID-19, or test positive for COVID-19.

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¹ Cloth face covering is a minimum requirement, other more protective respiratory equipment such as N-95 respirator masks, or disposable masks may be required by the agency.