

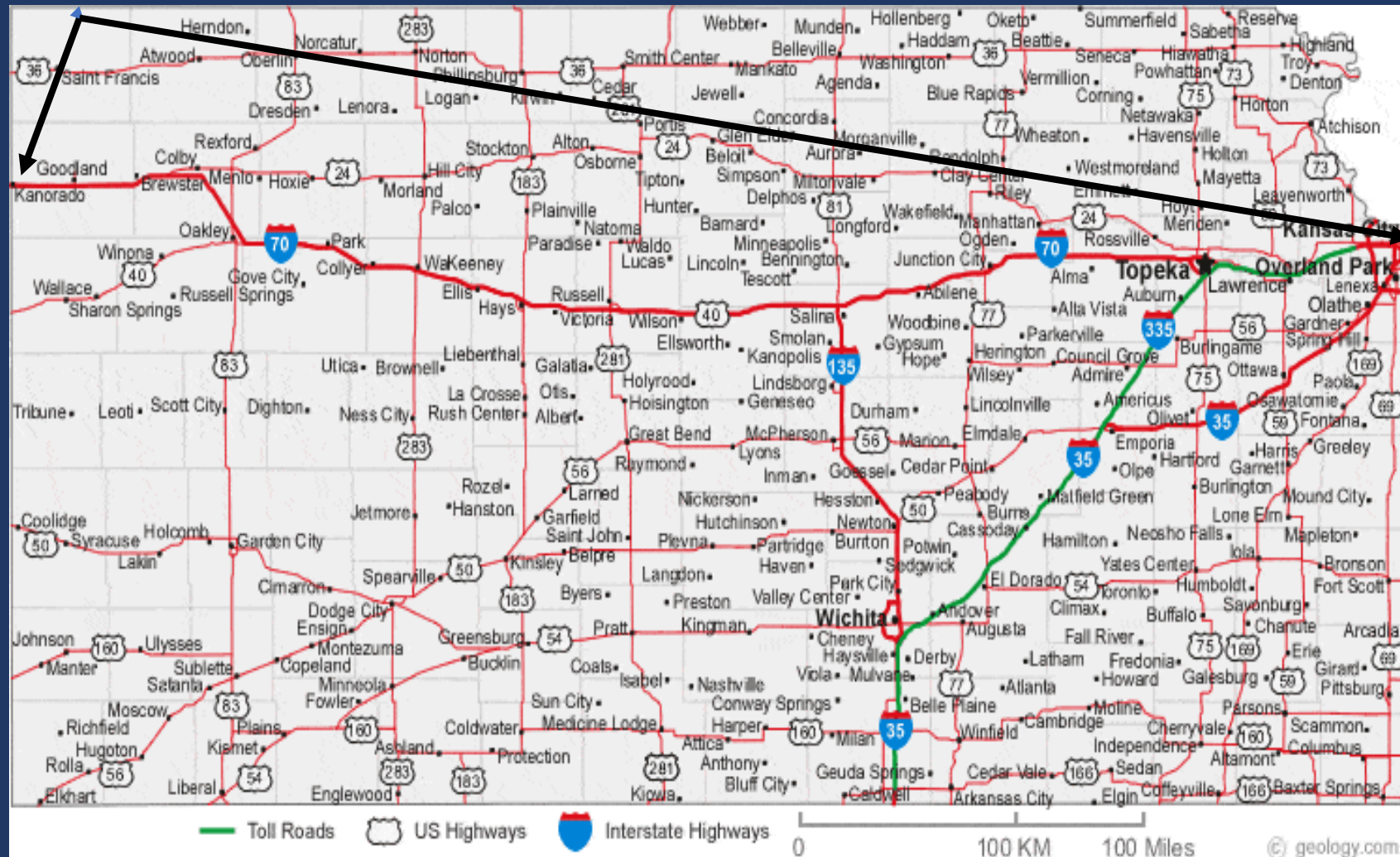
Food Processing and Remote Inspections



Food Safety & Lodging Program

*AFDO: Manufactured Food Virtual Assessments,
Inspections and Audits*
June 17, 2021

Overview of Food Processing State of Kansas



- Kansas is approximately 82,277 square miles
- It takes approximately 5 hours and 45 minutes to drive from Kanorado, Kansas, to Kansas City, Kansas

Overview of Food Processing State of Kansas



- Kansas is the 15th largest state in the nation.
- Kansas has 105 counties
- KDA has four (4) food processing inspectors for performing various types of inspections: food processing, food establishment, Preventive Controls, produce farms and environmental sampling events.

Remote Inspections: Overview



- SOP/script
- Contact/email communication
- Educational vs. compliance
- Industry cooperation
- Advantages/challenges
- Future utilization

Standard Operating Procedures



Conducting Remote Inspections During the COVID-19 Emergency

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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.

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.

Example Contact Email Communication

Inspector contact to assigned facilities



Good Evening,

I hope this email finds you healthy and well. My name is Courtney Pierson and I am the food processing inspector with the Kansas Department of Agriculture. Due to the current COVID-19 situation, I would like to schedule a remote inspection for your food processing license ***“insert name of facility”*** as your routine inspection is due/past due [***last inspection performed on 12/12/2018***]. This remote routine inspection will be educationally focused on food safety risk factors and will allow us to discuss your operational procedures, address any questions pertaining to food safety concerns or any new processes/procedures that you may be performing during this time. This is an adjustment to our normal inspectional procedures [utilizing virtual/remote platforms for social distancing] whereby allowing us to minimize the risk of COVID-19 transmission while still attaining adequate confirmation of regulatory compliance and food safety practices.

Please let me know a day/time that works best for you, when you are producing, storing or distributing/in operation. Once we schedule the inspection, I will then send a follow-up email with instructions, date/time and what to expect, as well as a separate invite for a ZOOM meeting. Please let me know, when you have a moment so we can get you scheduled.

I can be reached via email at courtney.pierson@ks.gov or by cell phone/text at XXX-XXX-XXXX.

Thank you and if you have any further questions or concerns, please do not hesitate to contact me.

Example Confirmation Email

Confirmation and list of expectations

Hello “*insert facility contact*”,

Per our telephone/email communications, I have scheduled a remote routine inspection for your food processing facility “*insert facility name*” via Zoom [video conferencing platform] for the following date and time:

- **Wednesday, December 16th, 2020 at 1:00 PM**

An extra set of hands may be useful in assisting with the facility walk-through, equipment and the mobile device. Please send a copy of product label/s prior to the inspection, via email. Listed below are a few of the items that we will cover, please ensure that those items **highlighted in yellow** are onsite.

- *Review facility information [operational hours, contacts, ownership verification, size.]*
- *Water source, distribution and temperatures*
- *Hand washing sink(s) functional, stocked, hot and cold water*
- ***Thermometers for taking product temperature and to demonstrate temperatures [ensure that you have a thermometer onsite to check all cold/hot holding, water temperatures, as well as any other temperatures during processing].***
- *Products being produced and sizes of containers, packaging configurations*
- ***Labeling on product produced for review [send a copy of label, via email for all products being produced during the inspection].***
- ***Sanitizer test methods (strips, titration, etc.) and concentration. Please have solution made as we will be testing concentration with your test strips.***
- *Cooling procedures, cold/hot holding temperatures [as applicable]*
- *Cleaning and sanitation procedures for equipment, food contact/non-food contact*
- *Designated food suppliers and areas of distribution*
- *GMP's and facility related SOP's*
- *Process Controls [sanitation, GMP's, allergen, supply chain, logs/records]*
- *Processing equipment, production and storage areas*
- *Employee health/training policies*
- *Storage, distribution and transportation protocols*
- *Pest control*
- *Perimeter check around outside of facility*
- *COVID-19 information or questions*

Example Remote Inspection: Educational

Non Violation Comments

Item Number	Comment
1	Premises maintained in good condition.
3	Adequate storage spacing provided.
7	Interior lighting is shielded.
9	Exterior door and garage seals maintained.
12	Walk in freezer: 20F Dairy coolers - Milk: 34F Cream: 32F
13	Facility is on municipal water supply.
14	Processing room hand washing sink water temperature 126F.
17	Restrooms stocked and functional.
18	Hand washing stations stocked and functional.
21	Chemical containers properly stored and labeled.
23	Facility uses Quaternary Ammonia (Qt.) and Paracetic Acid (PA) sanitizers. Titration kits were available for both sanitizer products. Qt. sanitizer titrated to 100 - 400ppm, as per manufacturer's specifications. PA sanitizer titrated to 2000 - 2600 ppm, as per manufacturer's specifications.
26	Environmental monitoring sampled weekly and analyzed by third party lab. Inspector and Quality Control manager discussed corrective action procedures.
27	Inspector and Quality Control manager discussed allergen labeling procedures and cross contact prevention methods.
31	Packages labelled with best by and rotation codes.
32	Packaging line scales calibrated using certified weights.
33	Label reviewed for 'Marshmallow Filled Milk Chocolates' 64 g / 4 pack, plastic.
35	Inspector and Quality Control manager discussed operation's Food Safety plan.
40	All freight is contracted through 3rd party. Shipping inspection procedures discussed with staff.

Violation Comments

Item Number	Violation of Code	Comment
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Inspection Published Comment:

This inspection was conducted remotely using video conferencing. Inspector and facility management team were present for the remote walk through.

The facility was producing 'Marshmallow Medallion' 16 gram during the inspection. The facility produces assorted confections for national wholesale distribution.

The facility's FDA registration is current as of 10/02/2020. The ownership's Kansas Secretary of State registration is active and in good standing.

The following guidance documents were emailed to the operation's management:

Inspection Report

FSMA Combined Handout (Table of Contents below):

Reportable Food Registry - At A Glance

Assessment of Reinspections and Recall Fees by FDA - Fact Sheet

Key Facts about Preventive Controls

Key Requirements: Sanitary Transportation of Human and Animal Food

Key Requirements: Mitigation Strategies to Protect Human Food Against Intentional Adulteration

Key Requirements: Foreign Supplier Verification Programs

Food Safety Preventive Controls Alliance

Non Violation Comments



Example Remote Inspection: Compliance

Item Number	Comment
1	Outside perimeter check of the facility performed during inspection.
10	Inspector discussed with PIC cleaning and sanitation procedures for tabletop mixer, chocolate equipment, stock boxes and utensils. PIC said that all items that can be removed from mixers are submerged in 3-compartment sink and everything else is cleaned and sanitized in place.
12	Located in the candy production area reach-in-coolers, butter with an internal temperature that measured 40.5 F and cut-out sugar cookie dough with an internal temperature that measured 40.4 F. Facility has multiple freezers with all food frozen solid to touch. All cold holding units in compliance [unless otherwise noted in this report].
13	Facility is on municipal water, City of Emporia.
14	The handwashing sink [located adjacent to the 3-compartment sink] with an internal hot water temperature that measured 112 F. The handwashing located in the candy production area with an internal hot water temperature that measured 101.3 F. The handwashing sink located in the unisex restroom with an internal hot water temperature that measured 108 F. The hot water temperature at the 3-compartment sink measured 118 F.
18	All handwashing sinks adequately supplied with paper towels and soap.
22	Facility has contracted pest control on a monthly basis, last visit on 01/25/2021.
28	During inspection, facility was producing dark chocolate caramel sea salt pop-choc and cooling for later packaging into 3-ounce clear cello bags.
31	Facility utilizes lot code identification and traceability practices of all raw ingredients and throughout process. Inspector discussed with PIC pertaining to extending traceability on finished packaging of products via batch code and/or packaged on date.
32	Facility has contracted yearly calibration of scales and last performed on 09/25/2020.
33	A copy of the label was provided via email prior to the start of the inspection. Inspector reviewed label for Dark chocolate caramel sea salt Pop-Choc and appeared to be in compliance.
36	Discussed employee health and hygiene policy with PIC and PIC explained to inspector that employees must not work when sick and what physical signs /symptoms are assessed, including restriction and exclusion.
40	Facility utilizes a 3rd party for local delivery and PIC said that all product is delivered same day, stored in secondary containers/bags and separated.

Violation Comments

Item Number	Violation of Code	Comment
21	21 CFR 110.35(b)(2)	Cleaners/Sanitizers/Toxic Items (Stored/Labeled) - Toxic cleaning compounds, sanitizing agents, and pesticide chemicals shall be identified, held, and stored in a manner that protects against contamination of food, food-contact surfaces, or food-packaging materials. All relevant regulations promulgated by other Federal, State, and local government agencies for the application, use, or holding of these products should be followed. [A white plastic bucket with a cloudy liquid and cloth [located next to the handwashing sink in the candy making area] and without any label. The Person-in-charge (PIC) said that the wiping cloth bucket was chlorine sanitizer. Corrected-on-site (COS) PIC labeled wiping cloth bucket.]
23	21 CFR 110.35(d)(5)	Sanitizing agents - Sanitizing agents shall be adequate and safe under conditions of use. Any facility, procedure, or machine is acceptable for cleaning and sanitizing equipment and utensils if it is established that the facility, procedure, or machine will routinely render equipment and utensils clean and provide adequate cleaning and sanitizing treatment. [The wiping cloth bucket [located next to the handwashing sink in the candy production area] utilizing chlorine sanitizer and a concentration that measured <10 ppm. COS-PIC had employee dump bucket and refill with new chlorine sanitizer and recheck of the concentration measured 100 ppm.]

Inspection Published Comment:

This routine inspection was conducted remotely using video conferencing.

During the inspection, facility was producing dark chocolate caramel sea salt Pop-Choc for packaging in 3-ounce bags. Inspector discussed with PIC cleaning/sanitizing procedures for equipment and utensils, storage of ingredients, transportation/distribution of products pertaining to food safety protocols/procedures, traceability and employee health/hygiene practices.

The following additional handouts were provided to the PIC via email:

- MF_3201 Good Manufacturing Practices (GMP's)
- FDA FSMA bar code sheet
- #61 Chemical Storage

General Guidance and Resources about COVID-19 and food safety

<https://www.fda.gov/food/food-safety-during-emergencies/food-safety-and-coronavirus-disease-2019-covid-19>

<https://www.agriculture.ks.gov/divisions-programs/food-safety-lodging/food-safety-educational-materials>

Industry Cooperation



Advantages

- Reduction of travel time
- Education and retention by operator
- The person-in-charge played a more active role in the inspections



Challenges



- Poor connectivity
- Operator level of understanding with technology

Future Utilization

Remote inspections



- Planning
- Licensing
- Follow-ups [test strips/titration kits, sanitizer, thermometer, etc.]
- Low risk facilities [pre-packaged]
- Reviewing of documents/records

Contact Information



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