

Association of Food and Drug Officials

◆ Elliot O. Grosvenor Food Safety Award ◆

*This nomination must be submitted by **April 1**
to be considered for the current year's award*

Criteria for Nominations

The Elliot O. Grosvenor Food Safety Award is given to recognize outstanding achievements made by food safety programs within State Departments of Agriculture, Natural Resource Agencies, Public Health Departments or Environmental Conservation Departments in the United States or Canada. The award will go to the program that best showcases improvement, innovation or sustained high performance within a food safety program. A food safety program could include responsibility for: food safety, food protection, and food defense or food sanitation. The applications will be made to the AFDO awards committee by the deadline.

(PLEASE TYPE)

Date of Nomination: April 1 for the year ending December 31, 2021

Program's Full Name: Division of Food and Lead Risk Assessments, South Carolina Department of Health and Environmental Control

Nominator: Chandra Prakash Kanwat

Immediate Organization: Division of Food and Lead Risk Assessments

Agency: South Carolina Department of Health and Environmental Control

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AFDO Member: No

Executive Summary:

The COVID-19 pandemic, caused by coronavirus disease 2019 due to severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) infection, has been unprecedented, both in scope and the impact it had worldwide. The pandemic's impact on the food industry in South Carolina and elsewhere was immediate and devastating. All permits and inspections in South Carolina are based on Regulation 61-25 (references FDA Food Code 2017). Given the tight confines of the kitchens and the inability to social distance, we could not conduct inspections or even issue new permits as they required inspections per existing statutes. Business as usual could not continue, but neither could food safety be compromised. Management and staff searched for and found solutions for which there was no precedent.

In April 2020, the South Carolina Department of Health and Environmental Control (DHEC) Division of Food and Lead Risk Assessment's Food Program started virtual food safety checks using a modified protocol for inspections. As inspectors and the food facility owners became comfortable and adapted to this new reality, the program regrouped to discuss feedback and looked for potential paths moving forward. From these discussions came Limited Scope Inspection (LSI). Although the LSI is not a traditionally graded inspection, it is a mandatory Pass/Fail inspection and has been in effect since July 2020.

As of March 2021, over 30,000 virtual inspections have been conducted by the Food Program in South Carolina. The Food Program has set up a dedicated webpage for the food industry for COVID-19.

The Food Program partnered with the South Carolina Restaurant and Lodging Association (SCRLA) and the South Carolina Department of Parks, Recreation, and Tourism to participate in the Palmetto Priority Program, a voluntary initiative by the restaurant industry to reassure the customers about their commitment to provide a safe environment for staff and customers during the pandemic.

The Director of the Food Program has participated in a number of webinars over the course of the past year and gave presentations on the program's experience conducting virtual inspections. The Food Program as well as the Director of the program have been recognized locally and nationally for their work to implement virtual inspections. Most recently, the program received the "Outstanding Community Leader Award" from SCRLA in February 2021.

❑ **Agency Demography (Population Served, Age and Diversity)**

According to U.S. Bureau of Census estimates, the total population of South Carolina in 2019 was 5.1 million. Whites constitute 69% of the population and Blacks or African Americans constitute 27% of the population. The majority of the population (60%) is in the 18-64 years age group. Females make up 52% of the total population.

❑ **Agency Resources and Budget (Staff, Facilities, Revenues)**

DHEC is charged with promoting and protecting the state's public health, land, air, coastal resources, and water quality. DHEC provides wide-ranging resources and services and employs approximately 3,400 employees in support of its vision of healthy people living in healthy communities. DHEC is one of the few health departments in the country that has statewide jurisdiction, and there are no independent county or local health departments in South Carolina.

The Food Program, which is in the Division of Food and Lead Risk Assessments, is housed in the Bureau of Environmental Health Services (BEHS). BEHS manages and implements DHEC's onsite wastewater, rabies prevention, food program (retail, dairy, and manufactured food), laboratory certification, lead risk assessments, and oil, chemical, and nuclear emergency response programs. The total budget for all these programs is approximately \$15 million. The Food Program has about 156.50 full time equivalent employees (FTEs). There are 16 supervisors and 102.5 inspectors for the retail program. The retail food program had 20,213 facilities in 2019 and the manufactured food program had 78 facilities.

❑ **Program Planning/Self Evaluation (Vision, Staff Participation)**

The COVID-19 pandemic has had a devastating impact on the food industry in South Carolina and elsewhere. "Stay-at-home" and social distancing recommendations meant that regular customers were no longer seen in restaurants or grocery and convenience stores.

All permits and inspections in South Carolina are based on Regulation 61-25 (references FDA Food Code 2017). , Guidance issued by public health physicians to maintain a social distance of 6 feet from people to avoid and slow the spread of the COVID-19 disease meant that we could not conduct inspections or even issue new permits as they required inspections per existing statutes. The idea of conducting inspections virtually emerged during a conversation with an enterprising citizen who was keen on getting a permit to start his restaurant during the ongoing pandemic. The challenge was that all existing standard operating procedures (SOPs) and inspection forms were based on inspections that needed to be performed on site, such as the routine actions of taking food temperatures or monitoring the pH of the sanitizer solution. The Food Program staff adapted by changing existing inspection forms and standard operating procedures (SOPs).

❑ **Program Management (Staff Control, Community/Industry/Consumer Support)**

The Food Program staff is managed in a two-tier system. Staff in Central Office, located in Columbia, South Carolina, are managed by the Director of the Division of Food and Lead Risk Assessments. Staff located in regional offices are supervised by Area Directors. They all report to a common Bureau Chief.

The Food Program has traditionally had a close and mutually supportive working relationship with the food industry, and it was on display during the ongoing pandemic. The food industry was very receptive of the innovative ways the Food Program was adapting to regulate based on existing statutes.

The consumers found it reassuring that the food facilities in South Carolina were still being monitored during the ongoing pandemic to ensure that the food served to the public was safe.

❑ **Program Implementation (Training, Compliance, Enforcement)**

In April 2020, the Food Program started virtual food safety checks using a modified form (attachment A). The food safety check was voluntary and focused on food service options, risk factors and interventions, good retail practices, and general information pertinent to the COVID-19 pandemic. After the initial hesitation and learning curve associated with the virtual food safety checks passed, the response for these voluntary checks was phenomenal. Since the food safety check was voluntary, no enforcement was required.

As inspectors and the food facility owners became comfortable and adapted to this new reality, the program regrouped to discuss feedback and looked for potential paths for moving forward. From these discussions came Limited Scope Inspections (LSI – attachment B). Although the LSI is not a traditionally graded inspection, it is a mandatory Pass/Fail inspection and has been in effect since July 2020. It did come with a caveat that any item requirements under Regulation 61-25 not observed during the LSI may be documented at the time of next inspection. The LSI were designed to verify basic food safety measures in the establishment. Noncompliance was not an issue as the industry partners were more than eager to share with their customers that they were providing safe food.

The Food Program partnered with the South Carolina Restaurant and Lodging Association (SCRLA) and the South Carolina Department of Parks, Recreation, and Tourism to participate in the Palmetto Priority Program, a voluntary initiative by the restaurant industry to reassure the customers about their commitment to provide a safe environment for staff and customers during the pandemic. Part of the requirements of participation in this initiative was to have an LSI done. More details can be found at their website at <https://palmettopriority.com/>.

□ **Program Outcomes (Measurable Outcomes)**

As of March 2021, over 30,000 virtual inspections have been conducted by the Food Program in South Carolina.

The dedicated webpage set up for the food industry for COVID-19 includes a tool kit which includes signage, templates, a checklist, and educational materials. Guidance fact sheets for responding to possible and confirmed COVID-19 ill food workers were developed and shared on the webpage. A video recording of a virtual food safety check is also posted on the webpage. More details on the educational materials can be seen at <https://scdhec.gov/food-safety/food-safety-covid-19>.

In addition to the materials posted on the webpage, the program printed over 30,000 handwashing stickers that were distributed across the state to address the fact that handwashing was a critical component of food safety and a preventive tool in mitigating the transmission of COVID-19.

The Director of the Food Program has given numerous presentations at virtual conferences over the course of the past year. These include, but are not limited to, presentations at virtual meetings hosted by Association of Food and Drug Officials (AFDO), Association of State and Territorial Health Officials (ASTHO), National Environmental Health Association (NEHA) and The Partnership for Food Protection (PFP). She shared the program's expertise and experience with virtual food inspections and received many accolades. The Food Program has been recognized locally and nationally for their work to implement virtual inspections. The most recent recognition was the "Outstanding Community Leader Award" by SCRLA (attachment C) which was presented at the 68th Annual Stars of the Industry Awards Luncheon in February 2021.

❑ **Goals for Improvement**

The virtual inspections have been a major success for the program and have been shared and successfully implemented in other jurisdictions within South Carolina as well as other states. While the initial challenges of adopting a new technology and associated business processes have been overcome, the following areas may be improved:

- 1) The legal framework to conduct a regular inspection under existing statutes does not exist and is something that needs to be explored to ensure the virtual inspections remain a viable legal tool in our tool kit in the future.
- 2) Training of food industry staff to ensure that everyone can use smart devices safely in a potentially hazardous environment of a busy restaurant kitchen.

❑ **Issues/Challenges/Risks**

The implementation of the virtual food safety checks and the limited scope inspections was challenging, because the program was a pioneer in developing these innovative tools to respond to the pandemic. There was no established guidance available. From the initial development of education materials to pilot testing the virtual checks and inspections, everything had to be done via virtual team meetings. Working with food industry staff to guide the inspections virtually was a steep learning curve for both staff and industry partners.

While a wide variety of video conferencing services including Microsoft Teams, Apple Facetime, Skype for Business, and Android Video Call were being utilized during food safety checks and limited scope inspections, there were still facilities that either did not have smart devices to use these services or the internet connection was not reliable. To overcome this challenge, some of the food safety checks had to be done via phone calls.

Extra precautions had to be taken during the virtual inspections, since the food industry staff were walking about in the kitchen with their attention focused on their communication with the inspectors via smart devices.

□ **Summary (Improvement or Innovation that Merits Award)**

The implementation of the virtual inspections was certainly not planned, but it was something that the Food Program was prepared for. The program has been at the forefront in preparing for new and innovative ways to integrate technology and food safety for a long time. Some of the work done over a decade earlier with electronic inspections and an online food surveillance system meant that we were ready to quickly adapt and respond to the unique challenges of the pandemic.

In 2007, all inspections were moved from the traditional pen-and-paper to electronic inspections. The move to electronic inspections ensured that all inspections are uploaded to a database every day and are available for analyses. A dedicated database manager shares detailed inspection reports with management across the state at least weekly and more frequently if needed. Metrics included in the reports include those related to specific food safety violations as well as metrics related to the inspectors. This ensures that any corrective measures can be implemented quickly. All inspection reports of the program are available to the public on DHEC's website. The combination of a dedicated database manager and electronic inspections ensured that forms could be modified quickly and deployed statewide for use by the inspectors during the ongoing pandemic. Training of the inspectors on these forms was done virtually. A video was developed that showcased a food safety check. This helped explain the virtual inspection process to not only the DHEC inspectors, but also the food industry partners, the media and the general public. This video was also shared with public health partners across the country.

In 2008, all food complaints across the state were moved to a centralized web-based food surveillance system (FSS) with both an internal and external webpage to submit complaints. This ensured that all responses to food complaints and potential foodborne outbreaks could be coordinated from a central location by a foodborne epidemiologist. The FSS currently e-mails every foodborne illness complaint entered into the system to multiple users in real time. This ensures that any potential foodborne outbreak is evaluated and there is an appropriate response even on holidays and weekends. With the onset of the pandemic, we started receiving several COVID-19 complaints daily. These included complaints that were not food safety related but needed to be referred to the SC Occupational Safety and Health Administration (OSHA). The program staff worked with colleagues in SC OSHA and created a referral mechanism in the FSS so that all these complaints can be e-mailed to the appropriate person in SC OSHA every day.

The food safety checks, and the limited scope inspections enabled us to provide reassurance to the public during the pandemic that the food being served in our facilities was safe for consumption. It enabled us to provide compliance assistance and validate active managerial control by the facility. The Program worked with SCRLA to participate in the Palmetto Priority Program. The primary goal of this initiative is a "formal commitment made by South Carolina restaurateurs to provide a clean and safe environment for their staff and customers".

As can be seen in this nomination narrative, the SC DHEC Food Program's commitment to sustained improvement and innovation has enabled us to be at the forefront in responding to the unique challenges of the ongoing COVID-19 pandemic. It is an achievement that is worthy of the Elliot O. Grosvenor Food Safety Award!

□ **Attachments**

- Testimonials (maximum of two)
- Acknowledgements
- Appendices

Nominated by: Chandra Prakash Kanwat

Signature: CPKanwat

The winner of this award will identify an individual to receive travel funds (if available and pursuant to AFDO's travel policy) to attend the annual AFDO conference held in June in order to publicly receive an official plaque of recognition and will be given time on the program agenda to comment on the award. The winner will be invited to attend the AFDO Wiley Awards Banquet during the conference.

Attendance is not mandatory for receiving the award. Return this form, a photocopy of this form (both sides) and ***please submit by April 1*** to:

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