



Standards and Intervention Strategies

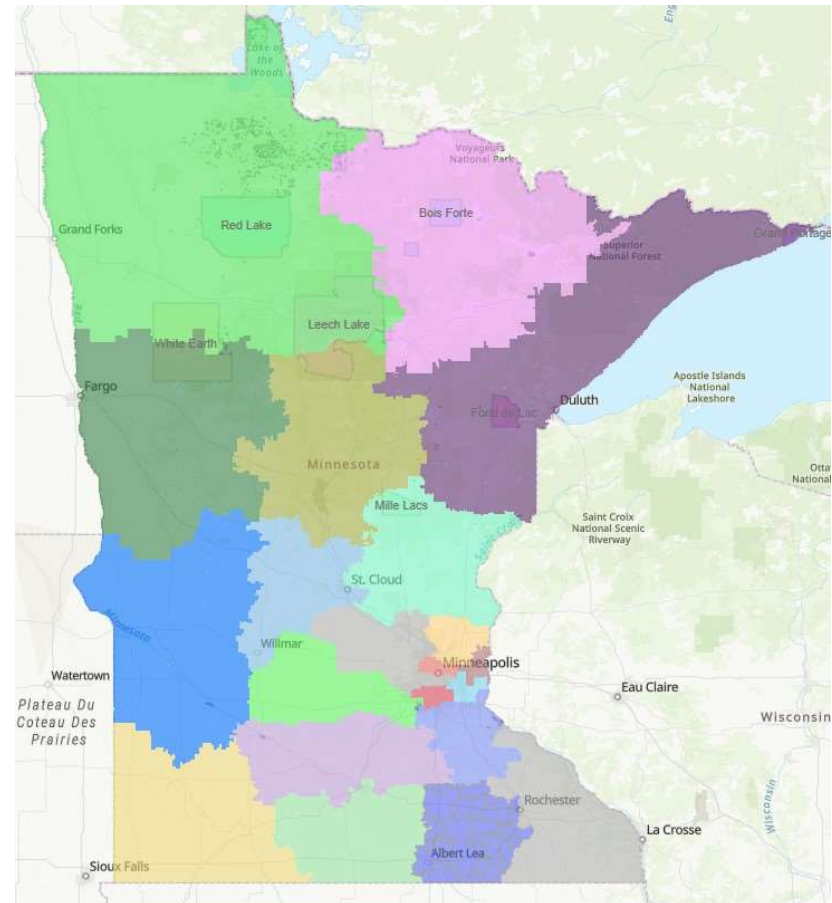
Jacob Schmidt | Retail Food Inspection Supervisor

FDA Retail Food Protection Seminar, 9/14/2026

MDA Retail Food

Who we are and what we cover

- 22 inspectors and 4 supervisors located throughout Minnesota
 - Grocery stores, farmers' markets, convenience stores, gift shops, etc.
 - Retail portions of food, bakery, meat, dairy, and alcohol manufacturing facilities
 - Vending and unattended food establishments
 - License exempt: Cottage Food and Product of Farm



Voluntary National Retail Food Regulatory Program Standards (VNRFRPS)

Regulatory Standard	MDA Conformance	Date Verified
1. Regulatory Foundation	No	<i>Self-assessed August 2025</i>
2. Trained Regulatory Staff	Yes	April 2026
3. HACCP-Based Inspections	Yes	March 2026
4. Uniform Inspection Program	Yes	April 2026
5. Foodborne Illness and Food Defense	Yes	April 2026
6. Compliance and Enforcement	Yes	May 2026
7. Industry & Community Relations	Yes	April 2026
8. Program Support & Resources	Yes	May 2026
9. Self-Assessment / Risk Factor Study	Yes	May 2026

Establishing Baseline - MDA Risk Factor Studies

- Observational (field) Study

- Retail staff conducted in 2018-2019
- Further improvements needed:
Contaminated equipment, Datemarking,
Cooling, Improper holding (hot/cold)

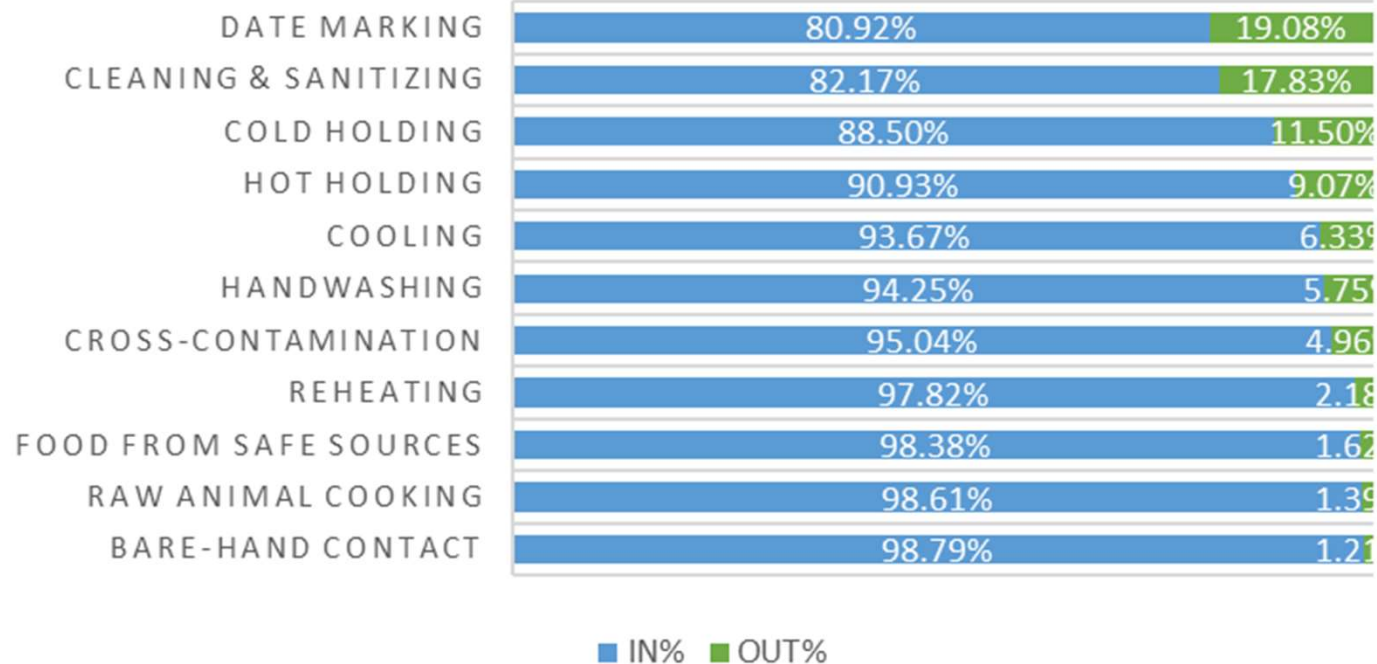
- Inspection Data (retrospective) Study

- Data from 2018-2019 was analyzed with comparable results (new baseline)
- Then analyzed data from July 1, 2022 to December 31st, 2023



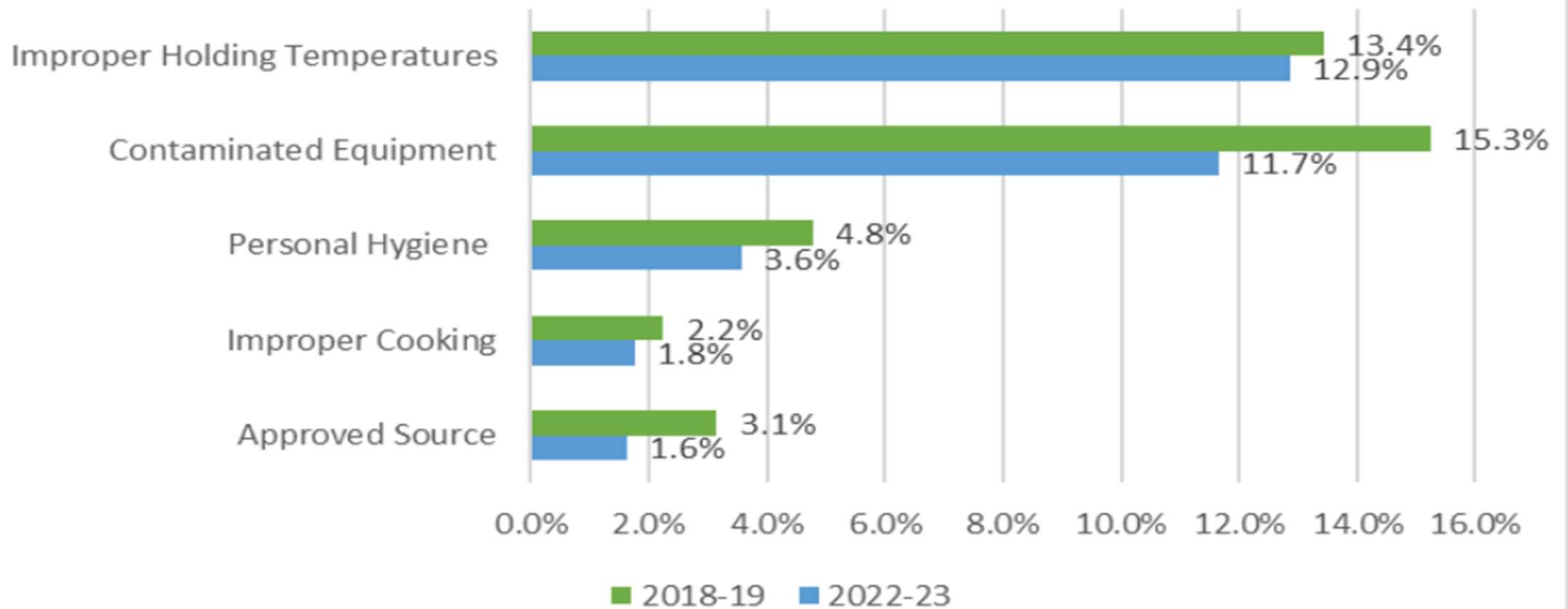
Risk Factor Study Results

PRIORITY DATA ITEMS - IN% VS OUT%



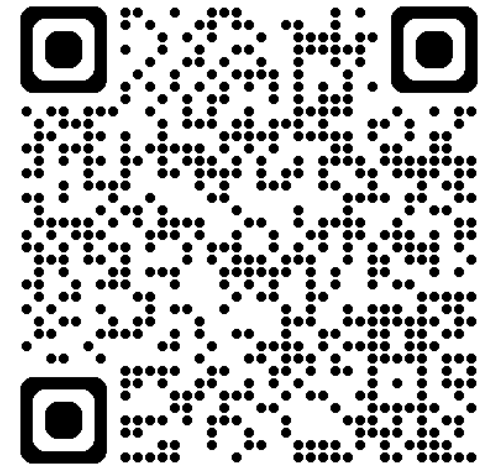
MDA Risk Factor Study Trends: All Risk Factors Reduced Over Time

Overall Risk Factor Comparison 2018-19 vs 2022-23



Intervention Strategies

- Inspector training on immediate corrective action documentation
- Long-term compliance – Corrective Action Plans (CAP) and Risk Control Plans (RCP) for risk factor and repeat risk factor violations
- Outreach and education
 - Targeted articles in Retail Food for Thought Newsletter
[Thought Newsletter | Minnesota Department of Agriculture](#)
 - Updated website and factsheets
 - Sought industry outreach opportunities



Tracking Intervention Metrics – Newsletters, Articles, Factsheets and Websites

- Metrics to measure

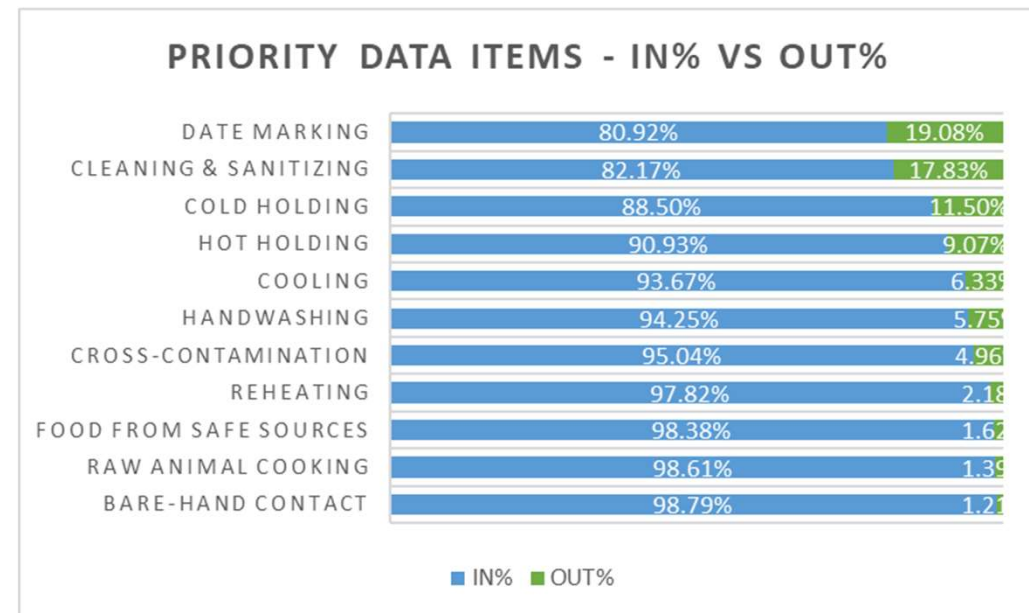
- Recipients
- Delivered
- Delivery %
- Bounce %
- Open Rate
- % Visit Ended (no clicks)

- MDA trends

- Factsheets have more visits and higher open rate than website articles
- Newsletters have highest open rate

Factsheet Views Generally Match Risk Factor Violations

- Most accessed MDA website factsheets
 - Cooling (8.7%)
 - Cleaning & Sanitizing (8.5%)
 - Time/Temperature Requirements (7.6%)
 - Date Marking (7.2%)
 - Employee Hygiene (6.2%)



Long-Term Control of Risk Factors

- Framework: Examine the effect implementing a Corrective Action Plan or Risk Control plan has on repeat high-risk violations at food establishments
- 2-year data collection period in 2021-2023
- Analysis with student worker in 2023-2024

Corrective Action Plans

- When to use:
 - Any time a P1 order is issued during an inspection
 - Any time a repeat P2 order is issued during an inspection
 - Any time a P1 or P2 order is issued for not complying with variance conditions
 - At any time if the inspector or supervisor assesses that documenting corrective actions and/or working in collaboration on a plan will benefit the food establishment to achieve compliance
- Open-ended, operator returns plan to inspector within 5 days

		625 ROBERT STREET NORTH, SAINT PAUL, MN 55155-2538 WWW.MDA.STATE.MN.US	
Food and Feed Safety Division 651-201-6027		https://www.mda.state.mn.us/food-feed/retail-food-inspection-program	
CORRECTIVE ACTION PLAN (CAP)			
Fill out and return to inspector within 5 business days of the inspection			
Name of Establishment:		USAFS Facility ID and License #:	
Physical Address (street, city, state, zip):			
Inspection Date:		Inspection Time In / Time Out:	
		8:00am	
Inspector's name and contact information (phone # and email):			
CAP can also be mailed: MDA Attn: _____ 625 Robert St. North, Saint Paul, MN 55155			
Person in Charge (PIC) Name/Title:		PIC Signature and Date Completed:	
Violation #: _____ Date Violation Corrected: _____			
Corrective Actions taken (immediate and long-term): _____			

Violation #: _____ Date Violation Corrected: _____			
Corrective Actions taken (immediate and long-term): _____			

Risk Control Plans

- When to use:
 - Repeat P1 order for a process-type violation or variance condition violations
 - Inspector and supervisor discretion to help the food establishment achieve compliance
- Structured format, inspector completes with operator before leaving premises

 DEPARTMENT OF AGRICULTURE		625 ROBERT STREET NORTH, SAINT PAUL, MN 55155-2538 WWW.MDA.STATE.MN.US	
Food and Feed Safety Division 651-201-6027		https://www.mda.state.mn.us/food-feed/retail-food-inspection-program	
RISK CONTROL PLAN (RCP)			
To be completed and returned to inspector within 5 business days of the inspection			
Name of Establishment:		USAFS Facility ID and License #:	
Physical Address (street, city, state, zip):			
Inspection Date:		Inspection Time In / Time Out:	
Inspector's name and contact information (phone # and email):			
RCP can also be mailed: MDA Attn: _____ 625 Robert St. North, Saint Paul, MN 55155			
As the person in charge, my inspector and I have developed and reviewed this risk control plan and I understand the requirements of this plan.			
Person in Charge (PIC) Name/Title:		PIC Signature and Date Completed:	

Specific observation noted during inspection:

Applicable code violation(s):

Risk factor to be controlled:

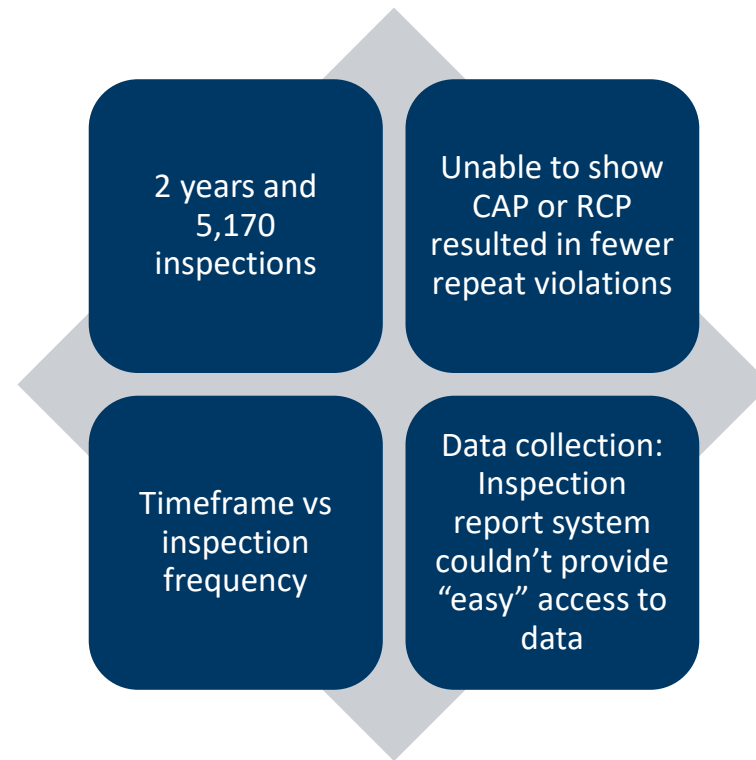
Hazard (most common, significant):

What must be achieved to gain compliance in the future?

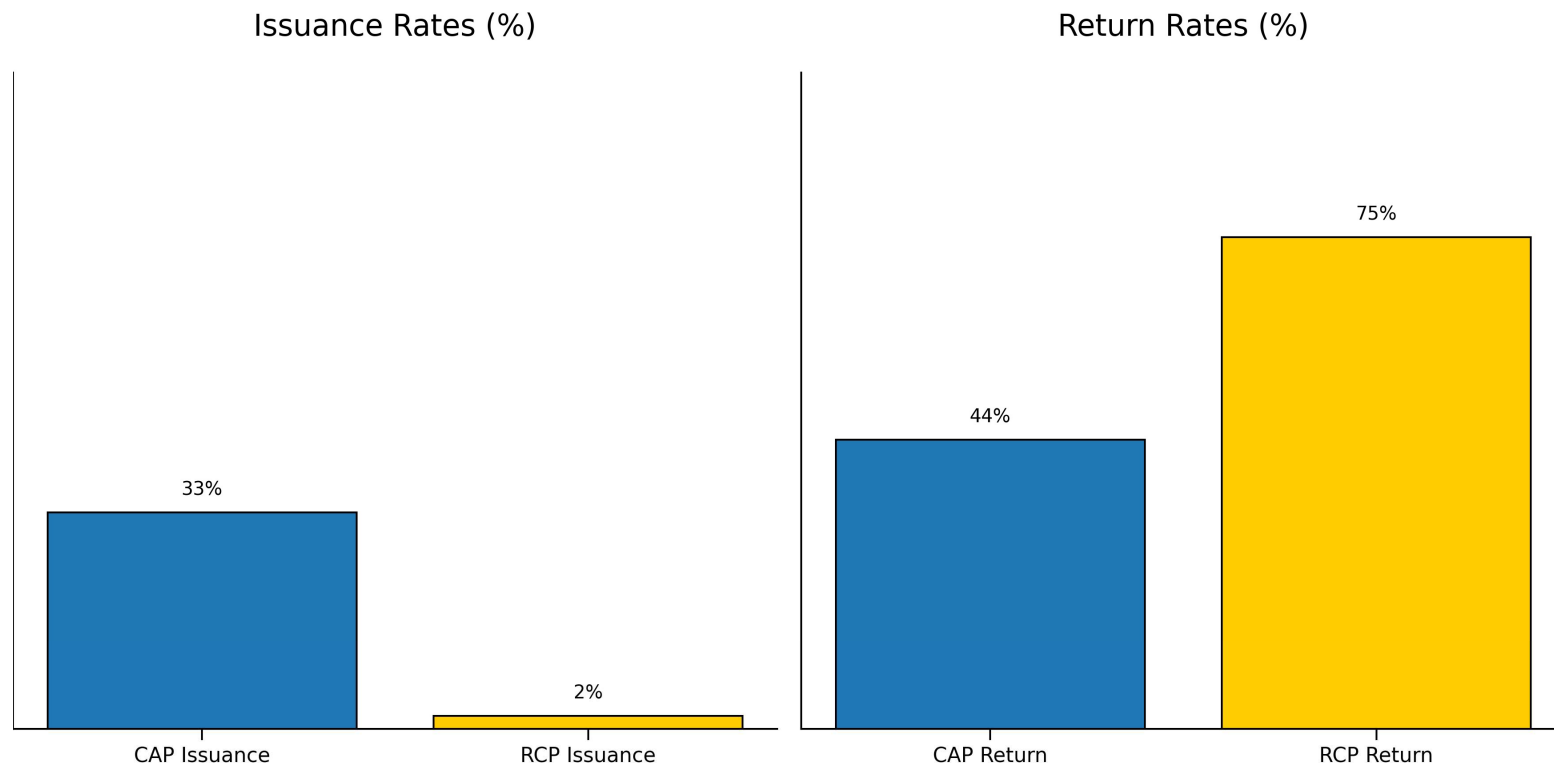
How will active Managerial control be achieved?

How will the results of implementing the Risk Control Plan be communicated back to the inspector?

Inconclusive Results & Lessons Learned



Issuance and Return Rates for CAP and RCP

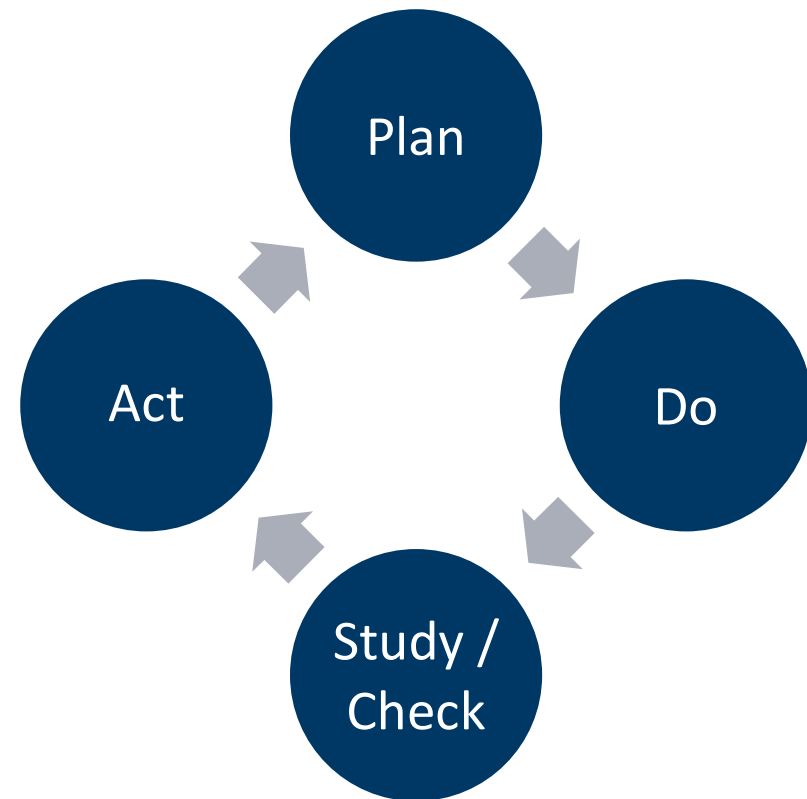


Issuance and Return Rates Varied Widely Among Inspectors

Rate	Lowest	Highest
Issuance Rate	6%	54%
Return Rate	0%	96%

2024 Assessment of the process

- Surveyed Inspection Staff
 - 90% of staff agree standardized tools for long-term corrective action are important
 - Disagreement that the CAP/RCP are effective tools as implemented
- Updated policy and retrained inspectors
 - Expand use of CAPs to all repeat P1, P2, and P3 orders
 - Modify use of RCPs to use in situations with inspector and operator buy-in



Current direction

MDA has now been using CAP and RCP for over five years and will continue to use them

Increased timeframe now allows for multiple inspections per facility

Data access issues are still the same – manual extraction from inspection software

CAP and RCP worthwhile to maintain, but resource and priority constraints place further analysis on the backburner

Next Steps

- Keep doing what we're doing well
- Improve existing interventions and improve outcomes for priority and emphasis items from risk factor study
- Engage with industry – survey for training, information needs and delivery preferences
- Plan next risk factor study and future intervention strategies



Thank you!

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