A Food Regulatory Inspection vs- An Environmental Assessment
Compare and Contrast

Overview

Risk-Based Food Safety Regulatory Inspection

The risk-based food safety regulatory inspection is conducted as part of an on-going regulatory evaluation of the food establishment. The inspection is focused on the control of Foodborne Illness Risk Factors and is a snap shot in time at a food establishment.

The regulatory inspection focuses on common food safety risk factors such as food from unsafe sources, inadequate cooking, inadequate holding temperatures, contaminated equipment and poor personal hygiene. By focusing the inspection on the control of these factors, inspectors can take the opportunity to educate the operator.

Foodborne Illness Outbreak Environmental Assessment

An environmental assessment is conducted in response to a specific problem or foodborne illness. The assessment focuses on and reconstructs past events related to implicated foods prepared and served during the implicated outbreak period. The environmental assessment is guided by epidemiologic and laboratory information. The goal of the assessment is to reconstruct past events, focus on implicated food(s), identify contributing factors, identify environmental antecedents and develop effective interventions.

Activities

A regulatory inspection addresses food safety problems occurring that day. The inspections are routinely conducted and target ongoing processes and procedures. The inspection focuses on the Centers for Disease Control and Prevention (CDC) Foodborne Illness Risk Factors, which include the leading causes of foodborne illness as well as the Indiana regulatory foundation, including applicable state statutes and rules.

- Introduce yourself, show your credentials and begin an open dialog with the person-in-charge (PIC) stating the purpose of the inspection.
- Review the menu with the PIC to identify high risk foods, food processes and applicable variances and HACCP plans.
- Ask about raw meats, pre-cooked meats, foods cooked to order and foods that are cooked, cooled and reheated.
- Start walk-through (wear hair restraint and wash your hands). Look for high-risk food preparation (foods with multiple trips through the danger zone).
- Assess if the food should include where ready-to-eat foods (RTE) and raw meats are prepared. Take cooking, reheating and holding temps. Check date marking for foods held over 24 hours. Look for the potential for cross contamination.
- Introduce the investigating team, show your credentials, open the interview of PIC and staff. State the purpose of visit and begin interview of PIC.
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In a routine regulatory inspection, the inspector may have responsibilities to coordinate and communicate the inspection with others in their agency. Communication may consist of marking OUT on an assignment board or informally telling the supervisor where he or she plans to inspect that day.

In an environmental assessment, coordination and communication may occur between local, state and federal public health agencies. Information sharing may occur between partnering local agencies, the IN RRT and federal partners. Coordination and planning between partners is critical to making the execution of the environmental assessment and the overall investigation successful.

Pre-planning consists of reviewing the food establishments file and determining what violations were cited during previous inspections. The facility’s past complaint history will be reviewed. May require little coordination except when issues are identified and/or when enforcement or corrective action is indicated. Agancy may require the sharing of inspection schedules to ensure appropriate inspection frequency, inspector safety and accountability.

Effective communication with the food employees and management on risk factors identified and their associated public health threats. Sharing what was found with public health partners.

Greater planning and coordination among different disciplinary and agency partners.

Understanding regulatory jurisdiction and disciplinary roles and responsibilities is critical. Compliance with confidentiality requirements and the use of information-sharing agreements (i.e. 20.88 Agreement) when sharing information with partners. Discussing known information with partners, identifying outbreak investigation team members, as well as roles and responsibilities.

Direction will be provided by investigation team leaders.

Environmental assessment involves a snapshot of observable conditions at the time of the inspection. The inspection focuses on food safety risk factors such as food from unsafe sources, inadequate cooking, inadequate holding temperatures, contaminated equipment and poor personal hygiene. No specific information suggesting that any violations were cited during previous inspections.

Knowledge about known pathogens and risk factors that support contamination, survival and proliferation is utilized. Staff are interviewed, a walk-through is performed and records and reports are reviewed and accessed.

The environmental assessment involves looking at the past when the implicated product or meal was served. Focuses on identifying contributing factors (how) and environmental antecedents (why) specific to the suspect/confirmed pathogen(s). Choose and collect food samples by identifying pathogen associated and statistically implicated foods. Illustrate each step of the food process by developing food process and food flow diagrams.

An environmental assessment addresses food safety problems that occurred in the past in response to a food safety problem. The intent of the environmental assessment is to reconstruct past events related to the implicated food(s) and what was prepared and served during the implicated time period. The assessment is guided by epidemiologic and laboratory data.

- Introduce the investigating team, show your credentials, open dialog with PIC. State the purpose of visit and begin interview of PIC and staff. Prepare a food process diagram and map the food flow of the implicated foods within the food facility.
- Request records. A record review can provide historical information about events and conditions in place during the implicated timeframe (i.e. timesheets, product invoices/repair receipts and written policies).
- Start walk-through by observing processes and practices that contributed to contamination, survival and proliferation of the suspect/confirmed pathogen(s). Measure temperatures of foods of concern during different preparation stages (cooking, cooling, reheating and holding) and ambient temperatures that may affect product temperatures. Identify factors contributing to the outbreak versus irrelevant violations. Observations will confirm, complete or refute information from interviews.
- Collect aseptic samples of foods or ingredients left from the suspect meal. If not available, try to get samples of food items prepared similarly. Coordinate with OPP and Laboratory before collecting. Then label, package and ship samples properly.
- Make recommendations for control strategies in final interview.
- Complete outbreak and regulatory reports and submit to team.

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