

Office of Food Protection
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http://www.phila.gov/health/units/ehs/Food_Protection_Off.html

Introduction to a Risk Based Food Inspection Program

What is this? A risk based food inspection program is one that uses an inspection approach that evaluates and focuses on the reduction of risk factors known to cause or contribute to foodborne illness and to promote active managerial control of these risk factors and uses the associated risk level of a food operation to determine inspection frequency.

Establishment Risk Assignment

An important part of this process is to assign a relative risk value to each establishment based upon the nature of the food operation and the more likely opportunity for conditions, procedures, foods or service conditions to support disease outbreak. This risk assignment would also reflect the frequency at which a particular establishment would receive inspections relative to other establishments with a different risk level assignment. Risk level assignment will use the terms low, medium, high and critical. These terms will generally be applied in the following manner:

- Low risk level - food operation that has limited food handling.
- Medium risk level - food operation that prepares food for immediate sale or service.
- High risk level - food operation that prepares a wide variety of foods often with multiple steps and processes and may prepare food in advance of service or sale.
- Critical risk level - food operation that prepares food for highly susceptible populations or any food operation that has a specialized food process.

Risk factors known to cause foodborne illness.

Centers for Disease (CDC) has identified the following five most frequent improper practices or procedures by epidemiological investigation as a cause of foodborne illness or injury:

1. Improper holding temperature;
2. Inadequate cooking;
3. Contaminated equipment;
4. Unsafe source (food);
5. Poor personal hygiene.

Inspection Protocol

Food establishment inspections are conducted to review and evaluate a **food establishment's operation** as well as physical facilities to assess its compliance with *food safety laws* and regulations. The evaluation of the establishment operation will require identification of all processes and food handling practices that may occur at any time and not just at the time that an inspection is being conducted. The inspection report will now include the following types of status identifiers.

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| “In” compliance - | food handling activity, operation, or management practices observed during the inspection meet requirements. |
| “Out” of compliance - | food handling activity, operation, or management practices observed during the inspection do not meet requirements. |
| “NO” – not observed - | food handling activity, operation, or practice occurs at the establishment but was not observed occurring and could not be evaluated at the time of the inspection. |
| “NA” – not applicable - | food handling activity, operation, or management practice does not occur as part of the establishment operation. |

The inspection process evaluates whether unacceptable consumer health risks from a biological, chemical or physical hazard source or property may occur as part of the establishment operation or handling of food. Such items are addressed in the inspection process as a **critical violation** versus a violation of good retail practices. Good retail practice violations being more focused on general physical facility conditions and general work practices that do not have directly food safety impacts.

Critical violations are associated with conditions related to the following areas:

1. **Demonstration of knowledge, or lack thereof.** Violations in this category directly relate to establishment management responsibilities and how safe food handling practices are employed within the establishment operation to prevent or eliminate risk of foodborne disease or injury.
2. **Employee Health.** Violations in this category directly relate to the prevention of foodborne illness from food contamination due to food handling activities by ill individuals as well as the prevention of disease to co-workers and the general public by proper health maintenance and hygiene controls.
3. **Approved Source.** Violations in this category directly relate to the source of the food supply; its safety, condition, identification, labeling and compliance with legal standards.

4. **Time/Temperature.** Violations in this category directly relate to proper cooking temperatures, hot holding temperatures, cooling temperatures and procedures and refrigerated food holding temperatures.
5. **Protection from contamination.** Violations in this category directly relate to how foods in the establishment are handled to prevent their contamination and how equipment and utensils are cleaned and sanitized to kill disease causing organisms that contaminate surfaces from food handling processes.
6. **Control of Hands as a Vehicle of Contamination.** Violations in this category directly relate to hand washing and the prevention of food contamination from a person's hand.
7. **Good Hygiene Practices.** Violations in this category directly relate to food handler work practices and behaviors that could result in direct contamination of foods.
8. **Chemical.** Violations in this category directly relate to how chemicals are properly handled and used to prevent contamination of foods.
9. **Conformance with Approved Procedures.** Violations in this category directly relate to following specific requirements when specialized processes or food handling procedures are approved for a particular establishment.
10. **Highly Susceptible Populations.** Violations in this category directly relate to not exposing such groups to foods that carry a specific high risk of disease for this population.

Active Managerial Control

A significant concept in the risk based inspection model is the concept of active managerial control. Active managerial control requires supervision of employee work activities by the person-in-charge to ensure that food safety practices to control risk factors are being properly implemented. This is tied in to the critical violation category and requirement of an appropriate demonstration of knowledgeable. The focus of active managerial control is the exercising and implementing of food safety knowledge.

The “Food Establishment Personnel Food Safety Certification” program requires food safety training and demonstration of food safety knowledge to qualify for certification. At least one person during hours of operation are required to be on-duty to provide the necessary oversight to ensure food safety practices to control risk factors are being properly implemented.

The “Food Establishment Inspection Program” supports the active managerial control concept by incorporating on-site corrective action measures based upon the conditions identified as part of the inspection process as well as prompting management to establish and implement long-term controls of risk factors. This is in addition to any administrative actions associated with enforcement protocols to gain compliance with regulation requirements.