



BOH Forms: #30 Remote Food Inspections

Board of Health and Local Health Department Standard Operating Procedures (SOP)

This **Checklist** highlights many of the permitting requirements for regulated Massachusetts Food Establishments. The checklist is designed to be used in tandem with the **MA Food Code**. **Remember: BOH always has the final say on requirements.**

Remote or Virtual Food Establishment Inspections

Note: *In-person, comprehensive food establishment (FE) inspections are most effective at identifying risk factors and ensuring compliance with the food code. On-site inspections are not always possible or advisable, especially during an emergency due to many factors including travel and infection hazards, limited time, multiple new pop-up feeding operations, personnel issues, etc. Many critical items can be assessed remotely. While these assessments may not cover the totality of an in-person inspection, this oversight will help FE's adjust to new regulations and improve the health and wellbeing of operators, staff, and customers.*

The Food Code and Remote Inspections

Note: The Massachusetts Food Code does not specify that inspections must be done on-site or in-person, though it is probably assumed. It is almost impossible to remotely conduct an unannounced inspection, enforce the disposal of an out-of-compliance food or observe the workflow of an active FE. Food Code 8-401.10(B)(2) does allow for phone calls to verify operations every 6 months at an existing FE. The Code also allows “**the scope of the food safety inspection to be determined by the board of health. ...and through reinspection and other means as appropriate.**” Many critical items can be assessed remotely, and some oversight is probably better than none.

Inspection Priorities

- Immediate Health Risks
- Health and Safety of the Workforce and Public
- Common Risk Factors
- Knowledgeable Person in Charge (PIC) and Demonstration of Knowledge
- Active Managerial Control
- Substantial Compliance with Orders and Codes
- Education and Cooperation

Items Harder to Assess Remotely

- General Feel of the operation, staff, patrons; especially during busy times if the PIC is also a food worker
- Cleanliness, pests
- Structure; Maintenance
- May take longer to conduct a comprehensive remote inspection.

Remote Inspection Steps

- Review file, permit application, menu, documents, complaints and previous inspections
- Send out a Self-Assessment Checklist and then review
- Schedule Remote Inspection during operating hours if possible.
- Remote FE Inspection Form, electronically if possible, to make sharing the final inspection report faster.
- Verify the following with PIC:
 - Inspection will take about an hour
 - Good internet connection required
 - Smartphone or tablet with camera
 - Download and test the agreed on Remote Inspection App
 - Flashlight needed
 - Tape Measure needed
 - Thermometer and alcohol wipes for sanitizing. Please calibrate your thermometer.
 - Have chemical test strips ready.
 - Have grease trap pumping records available.
 - Have most recent pest control inspection report available.
 - Have an assistant to hold the camera/phone for the PIC
 - Call/email any questions ahead of the scheduled inspection
- Request permission to record, if recording
- Introduce yourself and show credentials
- Start inspection at entrance
- Work clockwise or counterclockwise to keep the floorplan straight
- Do an overview and pan-out of each area

- Observe a handwashing demonstration
 - Observe a temperature check, both hot and cold
 - Discuss Menu and special processes
 - Ask about changes and challenges
 - Questions and concerns?
 - Closing Conference using video chat, phone, email. May screen share to review report.
 - Electronic Signature on Inspection form. May send back an email with form attached attesting to signature.
- Note:** can't enter public restrooms during operating hours unless they are first closed to the public.

Remote Inspection Apps

- Google Duo (Android)
- Facetime (Apple)
- Skype (Must have a free Skype account. Inspector "calls" the PIC using Internet/Skype App.)
- Zoom (Inspector must have a Zoom account. Invites the PIC by email to join the meeting.)
- WebEx or WhatsApp

Scheduling a Remote Inspection

- Risk-based scheduling used to determine the type of Remote Inspection to be conducted.
- Call the PIC to schedule during operating hours unless a pre-opening inspection.
- Agree on the App to be used for the Remote Inspection
- Verify Internet connection
- Agree on

Types of Remote or Virtual Inspections

- A. Permit and Document Reviews using online permitting system, email or phone.
- B. Self-Assessment Review/Audit using email, phone or video chat
- C. Pre-Opening Inspection using phone or video chat.
- D. Operations Inspection using video chat or app
- E. Closing Conference using video chat, phone, email
- F. Compliance: Reinspection or follow-up in-person or using email, phone, or video chat

A. Permit and Document Review Elements

- Permit Application
- Past Inspections
- Required Certifications
- Establishment Layout Plans and Specifications
- Establishment Written Policies
- Menu Review
- Required Consumer Disclosures and Advisories
- Safe Food Sources – review of supplier lists
- Review of Special Processes and HACCP Plans
- Signed Self-Assessment
- COVID-19 Control Plan

B. FE Self-Assessment Model Forms

- COVID-19 Control Plan Self-Assessment
- Food Establishment Self-Assessment
- COVID-19 Self-Assessment Model Form (Note: The situation changes rapidly, and this guidance may change at any time.)

Facility Name: _____ Address _____ Contact Info. _____

- PIC:** We have a knowledgeable Person-in-Charge (PIC) during ALL operating hours.
- COVID-19 Monitor:** The PIC has designated person to ensure COVID-19 protocols are followed on all shifts including screening staff and patrons.
- Masks:** We will enforce the mask requirements for all staff and patrons. If necessary, we will have a Greeter remind patrons of the BOH requirement for masks until seated and provide masks as necessary. Face coverings are required at all times for staff and patrons, except when seated and social distancing.
- Re-Opening:** When re-opening, we have cleaned and sanitized our establishment, flushed hot and cold-water taps and ice makers, cleaned or changed all filters, checked refrigerators and discarded any out-of-date foods and supplies.

- Cleaning and Disinfection:** We have staff designated to clean and disinfect frequently touched surfaces.
- Operations:** We have simplified our menu/operations to reduce cross contamination and food prep by wait staff.
- Capacity:** Indoor and outdoor seating has been reduced where needed to maintain required 6 ft. social distancing.
- Seating:** We will only have outdoor seating and take-out unless otherwise approved by the Board of Health (BOH).
- Tables:** All tables are placed to ensure that diner's tables and chairs are at least 6 feet from other dining groups' and away from high traffic areas or solid barriers at least 6 feet tall are between tables.
- Outdoor Enclosures:** All tents, umbrellas and other coverings have at least 50% open sides, even when raining.
- Bathrooms:** Bathrooms with enhanced cleaning schedules will be open to the public when table service resumes.
- Waiting:** Waiting area/line separation and other social distancing requirements are managed. If necessary, we will instruct people to wait in their cars and move to reservations or call ahead seating or pick-up.
- Social Distancing:** We will enforce 6-ft social distancing as required by the BOH using signs and markers.
- Signage:** We have State COVID-19 signage at the entrance reminding patrons to wear a mask until seated.
- Self-Service:** We have eliminated all self-service items and shared condiments.
- Hand Sanitizer:** We have 60%+ ethanol/70%+ isopropanol pump hand sanitizer available for staff and patrons.
- Health Screening:** We screen our staff daily for illness and require sick staff to stay home.
- COVID -19 Plan:** We have a written COVID-19 Control Plan available on request to protect our staff and patrons:
 - Enhanced Facility Set-Up Procedures
 - Enhanced Operating Practices
 - Enhanced Signage.
 - Enhanced Cleaning and Sanitation Plan
 - Enhanced Staff Health Policies
 - Enhanced Staff Training Plan
- Food Code:** We will continue to meet the requirements of the Massachusetts Food Code 105 CMR 590.00.
- Inspections:** We will notify the BOH at least 24 hours before resuming or changing operations.
- Closure:** If contact tracing links my establishment with an outbreak, I will close for 24 hours for a deep cleaning and a review of my COVID-19 Control Plan as determined by the Board of Health.
- Enforcement:** We will close if we can't meet the current Social Distancing, Disinfecting and Personal Protection Precautions as determined by the Board of Health.
- I affirm and certify that the information provided is true, I am 18, the person-in-charge (PIC), the owner or an authorized representative/agent of the establishment referenced in this self-certification and with authority to submit this certification to the Board of Health and grant access for inspections as allowed by law.*
- I will call the BOH at least 24 hours before my anticipated opening or any changes in my operations.*

Name

Title

Date

Town/City of _____ -			Type of Operation		Type of Self -Assessment	
Board of Health Food Establishment Assessment (Alliance 2020.06.15)			<input type="checkbox"/> Food Service Establish. <input type="checkbox"/> Retail Food Store <input type="checkbox"/> Residential: Cottage Foods <input type="checkbox"/> Residential: B and B <input type="checkbox"/> Mobile/Pushcart <input type="checkbox"/> Temporary Food Establish. <input type="checkbox"/> Farmers' Market <input type="checkbox"/> Caterer; school, other		<input type="checkbox"/> Routine <input type="checkbox"/> Re-inspection <input type="checkbox"/> Pre-operation <input type="checkbox"/> Illness Investigation <input type="checkbox"/> General Complaint <input type="checkbox"/> HACCP <input type="checkbox"/> COVID Control Plan <input type="checkbox"/> Other _____	
Name	Permit #	Date	Risk Category	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4		
Address			Signature			
Person in Charge (PIC)		Certification Expiration Date	HACCP		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Contact Info						

IN- In compliance OUT - Out of compliance NA - Not Applicable NO - Not Observed COS - Corrected On the Spot R - Repeat Violation

	IN	O	NA	N		IN	O	NA	N
COMPLIANCE STATUS					COMPLIANCE STATUS				
SUPERVISION					FOOD/COLOR ADDITIVES & TOXIC SUBSTANCES				
1					27				
Person in Charge Present, demonstrates knowledge, performs duties					Food additives: approved & properly used				
2					28				
Certified Food Protection Manager					Toxic substance properly identified, stored used				
EMPLOYEE HEALTH					CONFORMANCE WITH APPROVED PROCEDURES				
3					29				
Mgt., food employee & conditional employee: knowledge, responsibilities and reporting					Compliance with variance/specialized procedure/ HACCP plan				
4					SAFE FOOD AND WATER				
Proper use of restriction & exclusion					30				
5					Pasteurized eggs used where required				
Procedure for responding to vomiting & diarrheal events					31				
GOOD HYGIENIC PRACTICES					Water & ice from approved source				
6					32				
Proper eating, tasting, drinking, tobacco					Variance obtained for specialized processing methods.				
7					FOOD TEMPERATURE CONTROL				
No discharge from eye, nose & mouth					33				
PREVENTING CONTAMINATION FROM HANDS					Proper cooling methods used; adequate equipment for temperature control				
8					34				
Hands clean & properly washed					Plant food properly cooked for hot holding				
9					35				
No bare-hand contact with RTE food					Approved thawing methods used				
10					36				
Adequate hand wash sinks properly supplied & accessible					Thermometers provided & accurate				
APPROVED SOURCE					FOOD IDENTIFICATION				
11					37				
Food obtained from an approved source					Food properly labeled; original container				
12					PREVENTION OF FOOD CONTAMINATION				
Food received at proper temperature					38				
13					Insects, rodents & animals not present				
Food received in good condition, safe & unadulterated					39				
14					Contamination prevented during food preparation, storage & display				
Required records available: shellstock tags, parasite destruction					40				
PROTECTION FROM CONTAMINATION					Personal cleanliness				
15					41				
Food separated and protected					Wiping cloths: properly used & stored				
16					42				
Food contact surfaces: clean/sanitized					Washing fruits & vegetables				
17					PROPER USE OF UTENSILS				
Proper disposition of returned, previously served, reconditioned & unsafe food					43				
TIME/TEMPERATURE CONTROL FOR SAFETY					In-use utensils properly stored				
18					44				
Proper cooking time & temperatures					Utensils, equipment & linens: properly stored, dried & handled				
19					45				
Proper reheating for hot holding					Single use/single service articles: properly stored & used				
20					46				
Proper cooling time and temperature					Gloves properly used				
21					UTENSILS, EQUIPMENT & VENDING				
Proper hot holding temperature					47				
22					Food & non-food contact surfaces cleanable, properly designed, constructed & used				
Proper cold holding temperature					48				
23					Warewashing facilities: installed maintained & used; test strips used				
Proper date marking & disposition					49				
24					Non-food contact surfaces clean				
Time as a Public Health Control					PHYSICAL FACILITIES				
CONSUMER ADVISORY					50				
25					H & C water available; adequate pressure				
Consumer advisory provided for raw/undercooked food					51				
HIGHLY SUSCEPTIBLE POPULATIONS					Plumbing inst.; proper backflow devices				
26					M1				
Pasteurized foods used; no prohibited food					Anti-choking procedures 25 seats +				
52					M2				
Sewage & wastewater properly disposed					Allergy Awareness Training				
53					M3				
Toilet properly constructed, supplied & cleaned					Consumer Disclosures for raw animal foods				
54					M6				
Garbage/refuse properly disposed; maintained					M7				
56					M8				
Adequate ventilation & lighting;									

C. Pre-Opening Inspection Priorities

Facility Layout and Equipment

- Refrigeration equipment and temperatures
- Finishes and other equipment
- Chemical storage and labeling
- Food storage
- Signage posted
- Sanitizers and test strips
- Hot Water temperatures
- Water Systems flushed and filters and ice makers sanitized.
- HVAC system cleaned and filters changed
- Lighting with bulb shields
- Handwash Sink equipped with pump soap, single use paper towels and signage.
- Construction Debris removed, and facility cleaned and sanitized.

D. Operation Inspection Elements

Note: Inspection details and standards can be found in the BOH Job Aid # 20 Risk Based Food Inspections SOG.

- Required Signage posted
- Staff Training Plan demonstrated
- Hand Hygiene demonstrated
- Proper Glove use demonstrated
- Cleaning Plan demonstrated including frequent cleaning and disinfecting of high touch surfaces
- Sanitizers and disinfectants properly used
- Chemical Storage with labeling, test strips and Material Safety Data Sheets (MSDS)
- Dry Storage off the floor and away from walls
- Refrigerated Storage and temperatures
- Food Labeling and protection from contamination
- Handwashing Station in use
- Instrument/Thermometer calibration
- Time/Temperature Logs
- Workflows & Critical Control Points: Time/Temperature Controls, # times food goes through the danger zone
 - Receiving
 - Food Prep and Handling
 - Cooking, cooking temperatures
 - Hot Holding and hot holding temperatures
 - Cooling and cooling temperatures
 - Reheating

E. Closing Conference

- You must observe the violation – can't be hearsay or owner's records unless failing to keep adequate or compliant records is the violation. "See it to Cite it."
- Data may be used to assess violations such as disease reports linked to the establishment.
- Focus on the high-risk factors for Foodborne Illness
 - FOOD FROM UNSAFE SOURCES/RECEIVING TEMPS
 - INADEQUATE COOKING TEMPERATURES
 - IMPROPER HOLDING TEMPERATURES
 - CONTAMINATED EQUIPMENT
 - POOR PERSONAL HYGIENE
- Document onsite/immediate corrections taken on inspection form.
- RED**/critical items are priority (immediate correction or up to 10 days).
- Request plans for correcting non-critical violations (90 days to complete).
- Plans for preventing violations – Develop Risk Control Plans or HACCP.
- Provide educational materials/links.
- Both PIC and Inspector can virtually sign Inspection Form.
- Give copy of inspection form to PIC by printing, copying or emailing.
- You may also possibly require the following from the PIC, depending on issues:

- Active Managerial Control means plans to address/prevent repeat violations; may require a written improvement plan.
 - FOOD CODE INTERVENTIONS
 - DEMONSTRATION OF KNOWLEDGE
 - IMPLEMENTATION OF EMPLOYEE HEALTH POLICIES
 - HANDS AS A VEHICLE OF CONTAMINATION
 - TIME/TEMPERATURE RELATIONSHIPS
 - CONSUMER ADVISORIES

F. After the Inspection: Compliance/Education/Assurance

Enforcement after Education: Goal is Long-term Compliance with good Retail Food Practices

Voluntary Corrections:

- Corrected during inspection
- Plans for other corrections
- Policy changes
- Facility Changes

Managerial Control Changes: Priority changes for issues pose an immediate danger

- Training; Chemistry/ Biology/Physical risks
- Workflow; Facility; Layout
- Change of Equipment Layout Proposal; Equipment Specifications.
- Processes and Practices like handwashing and eating/drinking in food prep area

- Employee Health Policy and Screening
- Written Employee Policies and Procedures
- Develop and Implement Recipe/Process Instructions based on HACCP principles.
- Establish First-In-First-Out (FIFO) Procedures
- Development of Standard Operating Procedures (SOPs)/ Risk Control Plans (RCPs)
- Develop/implement HACCP based Comprehensive Voluntary Food Safety Management Systems

Involuntary Compliance results from the following enforcement activities:

- Warning letters**
- Re-inspections** – can have up to 90 days to correct non-critical violations
- Citations/Fines**, re- inspection fees, administrative hearings and permit suspensions
- Summary Abatement:** (such as closure) – actual, not potential public health risk
- Agency Hearing:** (repeat violations or violations not abated)
- Legal Actions**
- Embargo:** entitled to hearing, but can't use food until after hearing
- Seizure:** (voluntary seizure best – otherwise hold hearing is advised for expensive foods)
- Revoke Permit/Closures:** unless an imminent health threat, must hold a hearing first.
- Injunction/Restraining Order:** Court orders to cease or take action
- Order to Abate/Cease and Desist:** nuisances/code violations; administrative orders to abate issued