Considering COVID-19 During Routine Retail Inspections in 2020 and Beyond(?)

Massachusetts Department of Public Health
Bureau of Environmental Health
Food Protection Program

Presentation to Massachusetts Environmental Health Association

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Today’s Message

• Your safety is most important
• You are in control at all times
• You can protect yourself during
  • Pre-Inspections
  • Inspections
  • Post-Inspections
1a: Pre-Inspection

**Review Municipal Status.** Local restrictions vary.

**Schedule in Advance.** Contact owner/operator and discuss inspection in advance.

- Update demographic information, review types of food prepped on-site, discuss standard operating procedures and establishment’s employee health practices.
- Ask if employees are screened for COVID-19 symptoms prior to work and if positive and symptomatic employees are excluded from work.
- Avoid unannounced inspections; unless specific conditions at the firm indicate the need for an unannounced arrival.
1b: Pre-Inspection

**Personal Safety.** Expect an unusually high level of stress.

- If inspection is not “for cause”, and operator is extremely agitated, consider rescheduling if your personal safety could be at risk.

**Discuss Safety Precautions.** Advise establishment that you will:

- Reschedule if you feel ill or have an elevated temperature,
- Utilize regular hand washing prior to and during the inspection as necessary,
- Wear a cloth face covering, at minimum, during the inspection,
- Maintain social distancing (6 feet) to the extent possible during the inspection, and
- Sanitize inspection equipment prior to conducting the inspection.
1c: Pre-Inspection


- Make every effort to conform with or exceed establishment’s requirements during the inspection.
- Ask if the establishment has any specific protective equipment that employees and visitors are required to wear.
- Ask firm to complete and share a self-assessment.

Discuss the Inspection Plan. Discuss how the inspection will be conducted.

- Request a limit on the number of employees that accompany you during the inspection to allow for proper social distancing.
RESTAURANTS

MA COVID-19 Checklist

Restaurants may provide outdoor table service at the commencement of Phase 2 of the Commonwealth’s Reopening Plan. Restaurants will be authorized at a later date and by a subsequent Phase 2 Order to commence indoor table service if the public health data reflects continued positive progression.

SOCIAL DISTANCING

Ensure >6ft between individuals

☐ When indoor table service is permitted, restaurants are encouraged to structure operations to operate as much as possible through outdoor table service and to strictly limit indoor table service in order to assure effective compliance with social distancing requirements and to limit activities within confined spaces.

☐ Restaurants must comply with the following sector specific social distancing rules for providing dining services in all customer seating areas:

  • Tables must be positioned so to maintain at least a 6 foot distance from all other tables and any high foot traffic areas (e.g., routes to bathrooms, entrances, exits); tables may be positioned closer if separated by protective / non-porous barriers (e.g., structural walls or plexi-glass dividers) not less than 6 feet high installed between tables and high foot traffic areas.
  • The size of a party seated at a table cannot exceed 6 people.
  • Restaurants may not seat any customers at the bar, but subject to any applicable building and fire code requirements, bar areas may be re-configured to accommodate table seating that complies with all spacing and other requirements in these COVID-19 safety standards.
  • All customers must be seated; eat-in service to standing customers (e.g., around bar areas) is prohibited.
  • Restaurants may provide carry-out or delivery service, but all safety standards for table separation, size of party, and hygiene must be maintained for any indoor or outdoor table seating that is available to carry-out patrons.
  • All other amenities and areas not employed for food and beverage service (e.g., dance floors, pool tables, playgrounds, etc.) must be closed or removed to prevent gathering of customers.

☐ Ensure separation of 6 feet or more between all individuals (workers, vendors, and customers) unless this creates a safety hazard due to the nature of the work or the configuration of the workspace:

  • Close or reconfigure worker common spaces and high density areas where workers are likely to congregate (e.g., break rooms, eating areas) to allow 6 feet of physical distancing.
  • Redesign work stations to ensure physical distancing (e.g., separate tables, stagger workstations on either side of processing lines so workers are not face-to-face, use distance markers to assure spacing including in the kitchen area).
  • Establish directional hallways and passageways for foot traffic if possible, to minimize contact (e.g., one-way entrance and exit to the restaurant). Post clearly visible signage regarding these policies.
1d: Pre-Inspection

Cancel if Any Employees Become Ill. Ask establishment to call and cancel the inspection if the operator or any employee

• Test positive for COVID-19, or
• Develops COVID-19 symptoms (cough, fever, or difficulty breathing, muscle ache, loss or taste or smell, etc.)

Sanitize All Inspection Equipment. Sanitize before inspection:

• Pens, thermometers, clip boards, laptops, cameras, and inspectional equipment.
• Use an EPA-approved sanitizer or sanitizer containing at least 60% alcohol concentration.
2a: Inspection

Limit Inspection Personnel and Use Separate Transportation. If multiple inspectors are needed, drive in separate vehicles to location and maintain social distancing during the inspection.

Call Point of Contact on Arrival. Call your key point of contact upon arrival and ask to meet outside the establishment.
- Whenever possible, hold any preliminary discussion with management in an open-air environment and maintain social distancing, rather than meeting in a small office or meeting room.
- If meeting outdoors is not possible, then hold preliminary discussion in a space that will allow for social distancing (6 feet) between participants.
2b: Inspection

**Introductions.** Avoid shaking hands or exchanging business cards when introducing yourself or showing credentials.

**Personal Safety Equipment.** Put on any personal safety equipment entering the establishment.

- Cloth face-mask is the minimum requirement.
- Consider a lab coat or other protective covering to prevent clothing from becoming contaminated.
- Ensure any PPE you use during the inspection is either properly disposed of or sanitized at the conclusion of the inspection.
- Always wash or sanitize your hands after removing PPE.
2c: Inspection

Health Screening. Allow operator to verify your temperature or ask questions about any illness symptoms you might have (in keeping with their employee health practices) prior to entering the establishment.

- Only sign health statements or attestations which were reviewed during pre-inspection phone discussion.
- Do not sign statements which violate your own agency’s policies or procedures.

Verify Establishment Employee Health. Verify with the operator that none of the establishment’s employees recently tested positive for COVID-19 or are currently experiencing symptoms of COVID-19.
2d: Inspection

**Limit Inspection Equipment.** Only bring equipment into the establishment that is needed for the inspection.

- Limit equipment to what you can carry throughout the inspection.
- If you need more equipment than what you can carry, store some in an area that will minimize the potential for its contamination.

**Wash Hands.** Wash your hands with soap and warm water for at least 20 seconds upon entering the establishment.

- Carry an alcohol-based hand sanitizer (at least 60% alcohol) for use during the inspection after contacting frequently-touched surfaces.
2e: Inspection

Avoid Touching Frequently Touched Services. Allow the operator to open doors, turn on lights, and move equipment whenever possible.

Encountering Ill Employees. If you encounter somebody who appears to be ill:

- Avoid that person and their work area.
- Ask the operator additional questions about that employee’s apparent symptoms to ensure your safety.
- Stop the inspection, record your findings, and come back at a later date if:
  - The employee has symptoms which are consistent with COVID-19, or
  - You observe practices which demonstrate that firm is not following COVID-19 precautions covered during the pre-inspection call.
2f: Inspection

Avoid Enclosed Areas with Others. Ask staff to wait outside of walk-in coolers or other small enclosed areas while you inspect.

Modify Inspection to Reduce Potential for Disease Transmission. Assess your inspection routines with safety and disease transmission prevention in mind.

Exchange of Paper or Equipment. Do not exchange clipboards, pens, or paperwork during the visit:

• Send completed inspection reports to the establishment electronically; collect any needed documentation from the establishment electronically (such as via e-mail).
• If you need to collect records from the establishment, have a dedicated file folder that paperwork can be dropped into without you having to handle it.
2g: Inspection

**Signature Collection.** During this period of elevated risk:

- Inspection reports are not required to be signed by a representative of the firm, and
- Inspectors shall document the date, time, and person that the record was provided to, and indicate that a signature was not collected.

**Personal Safety.** If at any time during the inspection, you feel your personal safety is at risk,

- Discontinue the inspection immediately,
- Leave the establishment, and
- Contact your supervisor.
**3a: Post-Inspection**

**Wash Hands.** Wash your hands with soap and warm water for at least 20 seconds prior to leaving the establishment.

**Sanitize Inspection Equipment.** Sanitize all equipment and electronics such as cameras, cell phones, and laptops that were touched or utilized during the inspection upon arriving at your vehicle.

**Remove Protection Clothing.** Remove your laboratory coat or other protective clothing coverings worn during inspection

- Place in a bag for proper laundering or disposal as appropriate.
- Use sanitizing wipes or spray to sanitize shoes.
3b: Post-Inspection

**Sanitize Hands.** Utilize an alcohol-based hand sanitizer (at least 60% alcohol) on your hands after

- Returning to your vehicle,
- Sanitizing inspections equipment, and
- Removing lab coat or clothing protection.

**Sanitize Vehicle.** Sanitize frequently touched surfaces in the vehicle, such as door handles, steering wheel, keys, etc.
What’s next?
Additional Resources

• Professional Organizations
  • MAEHA.org, MHOA.com, NEHA.org, AFDO.org

• State, Federal, and Local Agencies
  • MASS.gov, DPH/BEH/FPP, FDA Retail, Barnstable County

• Academic Partners
  • MA Local PH Institute, UMass CAFE

• Industry Partners
  • MA Restaurant Assoc, MA Food Assoc, Berger Food Safety

• Retail Food Code
  • Inspection Intervals - 105 CMR 590.008(H); FC 8-401.10
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Questions?

• Mike at michael.moore@massmail.state.ma.us
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