Massachusetts Public Health Inspector Training (MA PHIT)

Food Certificate Program

Day 3, Session 1 **Report Writing Basics**

Day 3

- 1. Report Writing Basics
- 2. MA Food Establishment Inspection Report (FEIR) & Guide
- 3. Practice identifying, citing and writing violations
- 4. Compliance options and enforcement strategies
- 5. Mock Inspection and Worksheet



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DAY 3 Learning Objectives

- · Identify violations
- Cite violations using the inspection guide

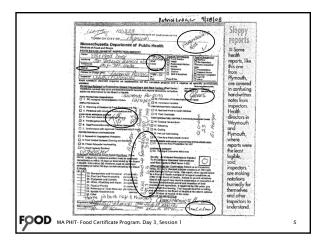
- Write violations using the inspection guide
 Write violations clearly and as observed
 Produce a well-written and complete MA FEIR
 List corrective action steps for progressive enforcement
 Give examples of other types of enforcement options to assure
- Summarize due process procedures
- Critique a basic inspection

Report Writing Basics



"The job isn't complete until the paperwork is done."

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Newspaper comments

"That's because it's not easy to get your hands on health inspection reports, and it is even harder to get them quickly. After calling and visiting six local health departments, The Patriot Ledger found it can take up to several days to find out whether a

• Metrowest Daily News Sept. 27, 2008

can take up to several days to find out whether a local restaurant is sanitary or not. And, once obtained, many of those handwritten reports <u>are barely legible, covered in abbreviated notes and cross-outs</u>".

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Paired Activity



Why do regulators write inspection reports?

Who are some audiences for reports?

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Purposes

- 1. Enforcement (legal document)
- 2. Education (tool for compliance)
- 3. Record keeping (public record)
- 4. Research



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Audiences 1. Operators 2. Enforcing/legal authorities Customers Researchers Reporters FOOD MA PHIT- Food Certificate Program. Day 3, Session 1

Day 3, Session 1. Report Writing Basics

Did This Serve a Purpose? Record Core of Core

MA FEIR

Inspection reports should be:

- Legible and clear
- · Well organized
- · Complete but concise
- · Objective and accurate
- Procedurally correct



Remember, Per Attorney Clark: "If it's not in the report it does not exist" and per 105 CMR 590.013(E)(b) "specific factual observations of violative conditions..." on the Correction Order

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Information About and Establishment

- Ownership and responsibility/PIC
- Environment (e.g. construction, sanitation...)
- Food handling practices
- Level of food safety risk/risk category
- Overall compliance



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Information For Your Supervisor/Agency

- Data (e.g. Number, type, and severity of violations)
- Recommendation or information needed to determine follow-up
- Facts and evidence needed to support regulatory or legal action



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Information for the Operator

- Describe violation condition
- May also provide general corrective advice and/or explanations about food safety/risk
- Encourage active managerial control!
- NOTE: different agencies have different policies about what can/can't go on the official report



Watertown, MA interns

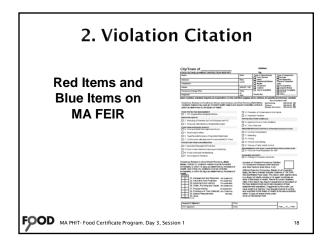
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MA FEIR Components

- 1. Heading & background information
- 2. Violation citations (red and blue)
- 3. Observations (narrative)
- 4. Description of any discussion with person in charge including recommended follow-up actions and signatures

1. Heading Information Accurate legal name and entity as well as DBA Fill in all boxes; verify application/file information Tel. | FOOD ESTABLISHMENT INSPECTION REPORT | Tel. | Harver |

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3. Observations

- · A report cannot be written unless the inspection is complete.
- Good, clear, concise notes are the key to a good report.
 - $\ \square$ Do not include opinions
 - □ Do include details on exhibits
- Remember, reports are public record.



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Documenting Observations

- Observations should be written in third person
- Observations should be written to be:
 - □ Descriptive (clear, well-organized, complete but concise)
 - □ Factual
 - □ Specific
 - □ Unambiguous
 - □ Relevant
- Words should be used and spelled correctly

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Documenting Observations

• Written observations should describe the violation...not jump to the correction needed



What about compliant behavior or good practices? MA PHIT- Food Certificate Program. Day 3, Session 1

Worksheet Activity

- 1. Descriptive observations
- 2. Distinguishing facts from opinions
- 3. Gathering all the facts
- 4. Presenting a complete picture/avoiding ambiguity
- 5. Distinguishing relevant from irrelevant facts

Close your binders!

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PLEASE REMOVE YOUR WORKSHEET AND CLOSE YOUR BINDER

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1. Describing Observations

Noted approximately 100 rodent droppings along the southeast corner of the ingredient warehouse. Also noted four (100 lb.) bags of corn meal that showed evidence of rodent entry in the same area.

See Exhibits 1 - rodent droppings.

Issued a voluntary disposal agreement for the product in rodent torn/gnawed bags (see separate form--attached).

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2. Fact vs. Opinion (sink)

The drain for the rinse compartment of the utensil wash sink was clogged and the sanitizer compartment was being used for storage of unused equipment.

Make sink operable by repairing drain and removing stored equipment.

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2. Fact vs. Opinion (seafood dept.)

In the Seafood Department:

- Hand utensils (e.g., knives, scrapers) were coated with dried food residue.
- Condensate from the overhead cooling unit was dripping on to a work table used to prepare ready-to-eat crab salad.

2. Fact vs. Opinion (ceiling)

Noted fiberglass ceiling tiles torn and missing above the cookie oven exit conveyor. Ready to eat (RTE) foods must be protected from contamination. Repair the ceiling to be smooth and impervious (cleanable).

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2. Fact vs. Opinion (slicer)

The deli meat slicer blade is pitted, rough, and un-cleanable. Product contact surfaces must be maintained in a smooth and cleanable condition. Repair or replace this slicer blade.

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3. Complete Picture... **Gathering Facts**

- Noted peanut butter was used in the formulation of "Ma Rambo's Georgia Chili," but peanuts were not listed the finished product ingredient statement. All product ingredients must be listed on the packaged product label and ingredients that may cause allergenic response must be listed using a commonly understood term for the specific allergen (Admin Code, s. 80.54). Properly label to show peanut butter as an ingredient.
- · All misbranded product is still in the warehouse and must be relabeled prior to shipment. 200 cases coded 020202 are under holding order/embargo #22547. (Attached are product sample #12, product label exhibit #13, product formula exhibit #14, holding order copy).

4. Complete Picture... Avoiding **Ambiguity**

I contacted Rudy Smith. Rudy said he would talk to his father, Ralph Smith, about the matter. I phoned Rudy Smith few days later, but Rudy had not gotten a chance talk to Ralph Smith yet. I asked the Plant Manager, Bruno Watkins, to notify me as soon as Mr. Watkins had fixed the problem. To date, Mr. Watkins has not contacted me.



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5. Distinguishing Irrelevant and **Relevant Facts**

Mark the facts that are irrelevant and places where more facts are needed.

I went to Center Meat Market, Inc. one day last week for a routine inspection. I've thought the place was well-run, but I had no reason to suspect gross violation of 12.34 (5), which is what I found. I saw meat that was off-condition and really not fit for dogs. An employee working in the cooler said, "Don't blame me. I told her, but the boss hates me..."



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Example: Plus relevant and minus irrelevant information

• During the August 21, 2002 inspection of Center Meat Market, Inc., I observed numerous and significant violations of meat storage requirements contained in Admin. Code 12.34(5). Meat stored in the retail walk-in cooler was stored at 51 degrees F. The meat was decomposing. The meat was slimy and had a sour odor. The store manager, Fred Oblivious, voluntarily disposed of 456 lbs of meat in the dumpster as detailed in the attached disposal agreement (#341245). Mr. Oblivious voluntarily ceased meat processing and storage until the store's refrigeration was repaired and walk-in was cleaned and sanitized. Meat processing resumed at 8:00 am on August 24.

Narrative report check list

- ✓ Nail down the what and where of observations
- √ Check spelling & word use
- √ Limit the use of pronouns & acronyms
- √ Use common language
- √ Write legibly
- ✓ Organize the report in a way that has obvious logic (and in a way that will aid during reinspection)
- √ Use and accurately reference photos, specimens, and flow charts to add value
- Exclude irrelevant information and include all relevant information

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REMEMBER!!!! Good narrative reports are the product of good inspections!



BUT poorly written reports can negate good inspections

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Questions?

Summary

- •Inspection reports serve multiple purposes and audiences
- They should be well-written and complete
- Descriptive narrative writing is a critical component
- It takes practice!

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