

**Massachusetts  
Public Health Inspector Training  
(MA PHIT)  
Food Certificate Program  
Day 3, Session 1  
Report Writing Basics**

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**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 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 compliance
- Summarize due process procedures
- Critique a basic inspection

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## Report Writing Basics



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



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A scan of a handwritten health inspection report form from the Massachusetts Department of Public Health. The form is filled with handwritten notes and has several items circled in red. To the right of the form is a sidebar with the heading "Sloppy reports" and a paragraph of text. The sidebar text reads: "Some health reports, like this one from Plymouth, are covered in confusing handwritten notes from inspectors. Health directors in Weymouth and Plymouth, where reports were the least legible, said inspectors are making notations hurriedly for themselves and other inspectors to understand." The "FOOD" logo is in the bottom left corner of the slide.



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## Newspaper comments

- Metrowest Daily News Sept. 27, 2008  
“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 local restaurant is sanitary or not. And, once obtained, many of those handwritten reports are barely legible, covered in abbreviated notes and cross-outs”.



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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

"If it's not in the report it does not exist"



Attorney Clark, V75 #4  
Nov. 2012

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## Audiences

1. Operators
2. Enforcing/legal authorities
3. Customers
4. Researchers
5. Reporters



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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!



Watertown, MA interns

• NOTE: different agencies have different policies about what can/can't go on the official report

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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

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### 4. Closing Recommendations/ Conclusions

- Use Discussion Box to summarize the results of the inspection
  - Focus on critical food safety violations
  - Be willing to show the PIC the violations if he/she did not accompany you
- Include recommendations for:
  - Specific corrective actions requiring immediate attention
  - Regulatory follow-up (date of reinspection)

Official Order for Correction: Based on an inspection report, the items checked indicate violations of 105 CMR 500.000/Regen Food Code. This report, when signed by a Board of Health member or its agent constitutes an order of the Board of Health. Failure to correct violations cited in this report may result in suspension or revocation of the food establishment permit and cessation of food establishment operations. If agreed to by the order, you have a right to a hearing. Your request must be in writing and submitted to the Board of Health at the above address prior to the expiration of this order.  
DATE OF REINSPECTION

Discussion With Person in Charge:	Corrective Action Required:	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	<input type="checkbox"/> Voluntary Compliance	<input type="checkbox"/> Employee Restriction/ Exclusion	
	<input type="checkbox"/> Re-inspection Scheduled	<input type="checkbox"/> Emergency Suspension	
	<input type="checkbox"/> Embargo	<input type="checkbox"/> Emergency Closure	
	<input type="checkbox"/> Voluntary Disposal	<input type="checkbox"/> Other:	

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### 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.

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## 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 ).

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#### 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.



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## 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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## Next Up

Sessions 2 : MA FEIR and Guide

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