STANDARD 3 – INSPECTION PROGRAM BASED ON HACCP PRINCIPLES

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STANDARD 3 – INSPECTION PROGRAM BASED ON HACCP PRINCIPLES

This standard applies to the utilization of HACCP principles to control RISK FACTORS in a retail food inspection program.

Requirement Summary

An inspection program that focuses on the status of RISK FACTORS, determines, and documents compliance, and targets immediate- and long-term correction of out-of-control RISK FACTORS through ACTIVE MANAGERIAL CONTROL.

Description of Requirement

Program management:

1. Implements the use of an inspection form that is designed for:
    a) The identification of foodborne illness RISK FACTORS and FOOD CODE INTERVENTIONS.
    b) Documentation of the compliance status of each RISK FACTORS and FOOD CODE INTERVENTIONS (i.e., a form with notations indicating IN compliance, OUT of compliance, Not Observed, or Not Applicable for RISK FACTORS)
    c) Documentation of all COMPLIANCE AND ENFORCEMENT activities and
    d) Requires the selection of IN, OUT, NO, or NA for each RISK FACTOR.
2. Develops and uses a process that groups food establishments into at least three categories based on potential and inherent food safety risks.
3. Assigns the inspection frequency based on the risk categories to focus program resources on food operations with the greatest food safety risk.
4. Develops and implements a program policy* that requires:
    a) On-site corrective actions** as appropriate to the type of violation.
    b) Discussion of long-term control*** of RISK FACTORS, and
    c) Follow-up activities.
5. Establish and implement a written policy addressing code variance requests related to RISK FACTORS and interventions.
6. Establish a written policy regarding the validation and verification of HACCP plans when a plan is required by the code.
7. The jurisdiction develops and implements a program policy for conducting reviews of plans submitted by food establishments****. The policy should include a review and determination of the adequacy of facilities, equipment, and procedures based on the establishment's intended menu, volume of food, flow of food and food processes. The program policy should include documentation of all plan reviews conducted (approval, conditional, denial) or, if the regulatory program does not conduct plan review or shares responsibility for the plan review with other entities or agencies, there are agreements in place between the agencies and the process for plan review is documented.

Outcome

The desired outcome of this standard is a regulatory inspection system that uses HACCP principles to identify RISK FACTORS and to obtain immediate- and long-term corrective action for recurring RISK FACTORS.

Documentation

The QUALITY RECORDS needed for this standard include:

1. Inspection form that requires the selection of IN, OUT, NO, or NA,
2. Written process used for grouping establishments based on food safety risk and the inspection frequency assigned to each category,
3. Policy for on-site correction and follow-up activities,
4. Policy for addressing code variance requests related to RISK FACTORS and interventions,
5. Policy for validation and verification of HACCP plans required by code,
6. Policy requiring the discussion of food safety control systems with management when out of control RISK FACTORS are recorded on subsequent inspections, and
7. Policy for conducting reviews of plans submitted by food establishments. The policy should include the documentation of all plan reviews conducted (approval, conditional, denial) or if plan review is conducted externally, documentation of the process (policy, contract, MOU).

**NOTE: Consideration of the elements outlined in Standard 4 will ensure a strong foundation for a quality and uniform inspection program.*

***NOTE: **On-site** corrective action as appropriate to the violation would include such things as:*

a. Destruction of foods that have experienced extreme temperature abuse,
b. Embargo or destruction of foods from unapproved sources,
c. Accelerated cooling of foods when cooling time limits can still be met,
d. Reheating when small deviations from hot holding have occurred,
e. Continued cooking when proper cooking temperatures have not been met.
f. Initiated use of gloves, tongs, or utensils to prevent hand contact with ready-to-eat foods, or
g. Required hand washing when potential contamination is observed.

****NOTE: **Long-term control** of RISK FACTORS requires a commitment by managers of food establishments to develop effective monitoring and control measures or system changes to address those RISK FACTORS most often responsible for foodborne illness. RISK CONTROL PLANS, standard operating procedures, buyer specifications, menu modification, HACCP plans and equipment or facility modification may be discussed as options to achieve the long-term control of RISK FACTORS.*

*****NOTE: Through their committee process, the Conference for Food Protection (CFP) has developed Plan Review for Food Establishment guidance on the CFP web site: www.foodprotect.org located under the icon titled, "Guides" and can be downloaded at https://www.foodprotect.org/resources/Documents/Guides/Plan%20Review%20For%20FE%20Guide%202025%20FINAL.pdf*