



STATE OF MICHIGAN
DEPARTMENT OF AGRICULTURE
LANSING

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GOVERNOR

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DATE: August 17, 2004

TO: All Local Health Departments (LHD's)
Attn: Health Officer / Director of Environmental Health
Michigan Department of Agriculture (MDA)
Attn: Food and Dairy Division Managers

FROM: Kevin Besey, Supervisor
Food Service Sanitation Section
Food and Dairy Division

A handwritten signature in black ink, appearing to read "K. Besey".

SUBJECT: Standard Operating Procedure (SOP) Guidance

Section 8-201.12(E) of the Food Code requires that "standard procedures that ensure compliance with the requirements of this code are developed or are being developed" during the plan review process. Also, the 2004 Minimum Program Requirements Guidance Document requires that local health departments obtain standard operating procedures during plan reviews beginning October 1, 2004. This requirement was added at the request of the LHD / MDA Workgroup that developed the 2004 MPR's.

To assist agencies in obtaining SOP's during plan review, the attached guidance was developed by an LHD / MDA workgroup. The guidance has been integrated into the existing MDA plan submittal instruction document. This document may be used for all applicable food establishment plan reviews, including STFU's. MDA's existing STFU SOP document is being discontinued.

Some of the guiding points used by the development workgroup were:

- Required SOP's should help reduce the five CDC risk factors. MDA feels that this is an important tool in helping to meet the department's goal of reducing risk factors in food establishments by 25% by late 2010.
- The main purpose of SOP's is to promote active food safety management and not create a document for regulatory review. Regulatory review should be limited to determining if the SOP's are technically correct and complete enough to be effective, not focus on reviewing writing, spelling and grammar skills. The overall goal is to assist and support food managers in creating a document that will help them manage food safety more effectively.
- Many facilities, especially chains, already have SOP's. SOP development will likely focus around independent operators.
- Existing problems in operations should be addressed using risk control plans, not SOP's.
- SOP development should be kept as simple as possible to avoid creating a roadblock in the plan review process.

Since SOP's are mentioned in a variety of existing plan review documents, a number of changes have been made which include:

- Application submission instructions now include SOP guidance.
- The plan review worksheet has been updated to allow an applicant to indicate that they are aware that SOP's must be developed and reviewed prior to opening.
- The plan review manual has been updated to include the guidance material.
- A SOP cover sheet has been developed to help document and organize SOP review. This sheet can also be used to create a SOP packet for STFU operators. Use of this or a similar sheet is recommended to help document SOP review for accreditation audits.
- A model letter has been created to advise plan review applicants of specific SOP's that must be developed. Since many SOP's only need to be developed if applicable to the operation, many facilities may need help in determining which SOP's must be written.

Your staff are encouraged to promote the use and refinement of SOP's once an establishment is operating.

Some plan review applicants may need or desire assistance in developing SOP's. To begin creating a group of professionals that are capable of assisting applicants, please notify designers, consultants and others in your area of the SOP requirements. Please also notify MDA of any state level assistance or materials you feel could help with the implementation of this guidance. Revised materials will also be posted on the plan review page of the MDA web site.