



STATE OF MICHIGAN
DEPARTMENT OF AGRICULTURE
LANSING

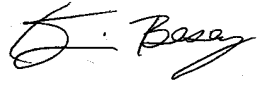
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DATE: September 12, 2005

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

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



SUBJECT: Accreditation Findings Summary (Cycle 2, Years 2&3)

Attached is a summary of all food service program accreditation reviews conducted since the accreditation was paused and the minimum program requirements were rewritten. As you will see from the summary, most agencies reviewed did very well and agency improvement consistently increased throughout 2004 and 2005.

One area that many agencies struggled with was MPR 2.8, having inspections result in code compliant establishments. We anticipate that MDA's "Foodborne Illness Risk Reduction Initiative" will provide strategies to help reduce the occurrence of risk factors in food establishments. The Risk Reduction Steering Committee is currently working to develop strategies and implementation plans which will be discussed with you in the upcoming months.

MDA looks forward to working with everyone during Cycle 3 evaluations, beginning in 2006. Cycle 3 MPR's, indicator guide and self-assessment forms are currently available for your use on the MDA web site at:
http://www.michigan.gov/mda/1,1607,7-125-1568_2387_2435-12820-124_126_127_129_119_381-.00.html.
We anticipate working with the MALEHA MPR advisory body to make a few final improvements to the MPR document prior to the start of cycle 3.

C: Melody Parker, MPH
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Food Service Sanitation Program
Section H
Accreditation Findings Summary
February 2, 2004 - August 12, 2005, (Cycle 2, Years 2 & 3)
32 Departments Evaluated

Introduction:

The purpose of this summary is to report the significant findings and trends noted during the past thirty-two food service sanitation program reviews. The information can be used by MDA to show program areas that may need clarification, training, and increased focus. Local health departments can use the summary when conducting self-assessments, writing “Moot Point Principle” memorandum, and as part of the over-all quality improvement process.

I. General Statistics

Average Number of Indicators Met (21 total):	17.6
Highest Number of Indicators Met	21
Lowest Number of Indicators Met	11
Average Number of Important Factors Met (6 total)	2.4
Highest Number of Important Factors Met	5
Lowest Number of Important Factors Met	1
Average Met with Conditions per Department	1.8
Average Number Special Recognitions* (21 possible)	11.9
Highest Number of Special Recognitions	18
Lowest Number Special Recognitions	3
Best Practices (offered by local health to MDA)	6

*given for 90+% indicator compliance and/or when an indicator that was Not Met in Cycle 1 is now Met

II. Trends in Compliance Over Time

Review Periods	Indicators Met	
	Range	Average
10 Reviews from February - June, 2004	11-20	16
10 Reviews from July - November 2004	13-21	17
12 Reviews from December, 2004 – August 2005	16-21	19.3

III. Top 10 Most Successful Indicators

Indicator	% Met
4.3 – New Construction (field)	100
2.2 – Inspection Frequency	97
2.3 – Vending Machine Locations	97
2.5 – Temporary Food Service Establishment Inspections	97
5.1 – Technical Training	97
5.3 – Specialty Food Service Inspection Skills	97
5.2 - Fixed Food Service Inspection Skills	94
2.1 – Pre-Opening Inspections	91
4.1 – Enforcement Policy	91
4.5 – Variances	91

IV. Top Problem Indicators

Indicator	% Met
2.8 - Inspections Result in Food Code Compliant Establishments (field)*	34
6.2 - Foodborne Illness Investigation Procedures	50
1.1 – Plan Review	72
2.4 – Follow-Up Inspections	75
2.6 - Inspection Procedures	75
4.2 – Unauthorized Construction	75

*31% that passed did so with a Met with Conditions

V. MPR / Indicator Compliance Overview

1 Plan Review: 72% Compliance (23 out of 32. Includes 6 depts. having Met w/Conditions):
Common Problems: Not obtaining complete sets of plans (applications, scaled drawings, menus, equipment specifications, plumbing plan, plan review worksheet, lighting info).
Records lack plan review checklists and calculations.

2.1 Pre-Opening Inspections: 91% Compliance (29 out of 32)
Common Problems: None

2.2 Inspection Frequency: 97 % Compliance (31 out of 32. Includes 2 depts. Having Met w/Conditions):
Common Problems: Not conducting inspections at the required frequency. Underlying cause often involves the lack of a tracking system to help determine if inspections are on schedule.

2.3 Vending Machine Locations: 97% Compliance (31 put of 32)
Common Problems: None

2.4 Follow-up Inspections: 75% Compliance (24 out of 32)
Common Problems: Not conducting follow-up inspections of critical violations within 30 days.
Not describing the corrective action taken for critical violations on the inspection report form

2.5 Temporary Food Service Establishment Inspections: 97% Compliance (31 out of 32. Includes 1dept. having Met w/Conditions):
Common Problems: None

2.6 Inspection Procedures: 75% Compliance (24 out of 32. Includes 3 depts. Having Met w/Conditions):
Common Problems: Not using approved inspection report forms. Not properly documenting critical and non-critical violations. Reports do not convey a clear message.

2.7 Identification of Critical Violations (field): 88% Compliance (28 out of 32. Includes 9 depts. having Met w/Conditions):
Common Problems: Not identifying critical violations during inspections.

2.8 Inspections Result in Food Code Compliant Establishments (field): 34% Compliance (11 out of 32. Includes 10 depts. having Met w/Conditions):
Common Problems: See VI Detailed 2.8 Summary.

3.0 Records: 84% Compliance (27 out of 32. Includes 11 depts. having Met w/Conditions):

Common Problems: Records for the audit were very difficult to obtain. Unorganized. Records were missing.

4.1 Enforcement Policy: 91% Compliance (29 out of 32. Includes 1 dept. having Met w/Conditions):

Common Problems: Enforcement policy did not afford notice and opportunity for a hearing equivalent to the Administrative Procedures Act. Failure to take enforcement action to prevent continuous critical violations.

4.2 Unauthorized Construction: 75% Compliance (24 out of 32. Includes 1 dept. having Met w/Conditions)

Common Problems: Failure to prevent construction from occurring prior to plan review and approval.

4.3 New Construction (field): 100% Compliance

Common Problems: None

4.4 License Limitations: 84% Compliance (27 out of 32)

Common Problems: Failure to advise the applicant that the license has been limited. Failure to list the reasons why the license has been limited. Failure to provide notice to allow for an administrative hearing.

4.5 Variances: 91% Compliance (29 out of 32. Includes 2 depts. having Met w/Conditions):

Common Problems: Applicant did not provided a statement of the proposed variance citing Code section numbers and an analysis of the rationale for how the health hazards will be alternately addressed.

4.6 Consumer Complaint Investigations: 88% Compliance (28 out of 32. Includes 1 dept. having Met w/Conditions):

Common Problems: None

5.1 Technical Training: 97% Compliance (31 out of 32)

Common Problems: None

5.2 Fixed Food Service Inspection Skills: 94% Compliance (30 out of 32. Includes 1 dept. having Met w/Conditions)

Common Problems: Training records are not maintained to verify compliance

5.3 Specialty Food Service Inspection Skills: 97% Compliance (31 out of 32)

Common Problems: None

6.1 Foodborne Illness Timely Response: 81% Compliance (26 out of 32. Includes 1 dept. having Met w/Conditions):

Common Problems: Failure to initiate an investigation within 24 hours. Records do not document the date/time when complaints are received and/or investigated.

6.2 Foodborne Illness Procedures: 50% Compliance (16 out of 32. Includes 8 depts. having Met w/Conditions):

Common Problems: See MDA memo dated March 12, 2004 titled “Foodborne Illness Documentation Reminder”

VI. Important Factor Review:

Important Factors	% Met
Important Factor I – Educational Outreach	100
Important Factor II – HACCP Program	3
Important Factor III – Continuing Education for Regulatory Staff	84
Important Factor IV – Program Support	22
Important Factor V – Industry and Community Relations	19
Important Factor VI – Quality Assurance Program	9

VII. Indicator 2.8 Details

The indicator is judged to be Met when no violation category on MPR Table 2.8 is marked more than 40% of the time by MDA. Sixty-six percent of the departments included in this summary did not pass indicator 2.8. An average of 2.5 violation categories per department were marked more than 40% of the time.

MPR Table 2.8 Violation Category	% of the departments evaluated having the violation category marked by MDA more than 40% of the time
Plumbing / Cross-Connections	63
Consumer Advisory	47
Date Marking	38
Time / Temperature	28
Toilet / Lavatories	13
Equipment – Nonfood Contact	9
Physical facility	6
Knowledge of the Person In Charge	3
Handwashing	3

Common Problems:

Plumbing / Cross-Connections: Most of the violations found in this category relate to air-breaks and air-gaps on waste lines. The waste lines are either directly connected or are connected via an air-break whereby an air-gap is required.

Consumer Advisory: See MDA memo dated April 29, 2004 for details. The lack of a disclosure accounts for most of the violations found.

Date Marking: Failure to date mark potentially hazardous refrigerated ready-to-eat food. Using the date of preparation rather than the consume-by date.

Time / temperature: Improper hot and/or cold holding temperatures. Failure to cool food properly. Failure to reheat food properly. Underlying reason for the chronic violation may be failure to ask proper questions during the inspection to detect improper time/temperature related procedures (risk based inspection).

Toilet / Lavatories: Sinks are not accessible, no signage, lack of soap and towels.

Equipment – Non Food Contact: Soiled equipment. Equipment is in poor repair.

Physical Facility: Condition of the floors, walls, ceilings, lighting, ventilation system, and dressing rooms. The premises are not maintained. There are unnecessary items on the premises. Other issues include cleaning equipment storage, separation of the food establishment from living quarters, laundry facilities, maintenance of the plumbing system, and outer openings are not protected to prevent entry of insects and rodents.

Knowledge of the Person in Charge: Person in charge is unable to satisfactorily answer the questions of the MDA program reviewer. Underlying reason may be failure to properly interview the operator during the inspection (risk based inspection).

Handwashing: Employees are not washing their hands as required or are not using proper handwashing procedures. Lavatories are not provided.