

Exploring critical issues in state and territorial public health.

# Virtual Food Safety Inspections During the COVID-19 Pandemic

# Introduction

State and territorial health agencies (S/THAs) play a significant role in inspecting food establishments. Beginning in March 2020, the rapid implementation of COVID-19 social distancing and stay-at-home orders required many food establishments to revert to a takeout and/or delivery model. To ensure that food establishments were abiding by food safety regulations and to protect the health of food safety professionals who inspect these facilities, multiple state health agencies implemented virtual inspection protocols. This brief overviews virtual inspection protocols from Hawaii, Virginia, and South Carolina to provide other S/THAs with examples of how these inspections are performed. The information below was obtained via direct communication with the state health agencies and written protocols provided to ASTHO.

# **Hawaii Department of Health**

The Hawaii Department of Health's (HIDOH) Food Safety Branch developed and implemented the state's virtual inspection protocol during an emergency proclamation that limited restaurant services to take-out and delivery. Virtual inspections were used for <u>pre-operational inspections</u> only and were conducted using either Google Hangouts or Apple FaceTime. Before inspection, HIDOH required detailed documentation of the facility layout, equipment lists, menus, establishment protocols, a Food Handler's Certificate copy, and hazard analysis and critical control point plans or a "Variance Request and Fee" for approval for special food processes (e.g., sous vide, acidification, extending shelf life with fermentation). A device capable of recording audio and video, an adequate internet connection, a flashlight, thermometers, and sanitization test kits were required to conduct the inspection. HIDOH then asked operators to perform several safety demonstrations on video, such as:

- Verifying dishwasher water temperatures.
- Displaying cooking, refrigerator, and "hot holding unit" temperatures.
- Checking dishwasher sanitizer concentrations.

Completed inspection reports were emailed to the operator with violations noted. If the facility passed, it opened under the agreement that an in-person inspection would be conducted once the state's emergency proclamation was lifted.

### **Virginia Department of Health**

The Virginia Department of Health's (VDH) Office of Environmental Health Services (OEHS) assists the state's 35 local health districts in implementing Virginia's food regulations. When restaurants closed their dining rooms following Executive Order 53, many establishments shifted to a take-out and/or delivery service model. To help food establishments conduct business safely, OEHS created the "Training Inspections During COVID-19 Response" protocol, which local health districts used to conduct Training Inspections over the phone or by video. The protocol included questions about food service options (e.g., delivery, take-out), employee health, actions taken to limit exposure among employees and between employees and the public, hygiene protocols, disinfection procedures, and menu changes. OEHS also developed a "Checklist for Phase One," which allowed health agency staff to gather



information on food establishments' preparedness to reopen under the state's phase one requirements. The checklist also gave establishment operators a reference point for reopening expectations. Information regarding checklist compliance was collected by health agency staff over the phone or by video. Reports were then sent back to food establishment operators via email. The checklist was later modified to coincide with Virginia's phase two requirements.

VDH also allowed pre-operational, complaint, and follow-up inspections to take place virtually, either over the phone or via video call. Permit renewal inspections still needed to be conducted on-site. Pre-operational permits were limited in duration and required an onsite renewal inspection for a long-term permit. Virtual pre-operational and complaint inspections used the standard Virginia <a href="Food-Establishment Inspection Report">Food-Establishment Inspection Report</a> form.

# **South Carolina Department of Health and Environmental Control**

The South Carolina Department of Health and Environmental Control's (SCDHEC) food team instituted a <u>virtual pre-operational/permit inspection protocol</u> for food establishments. Participation in virtual inspections required operators to have sufficient internet bandwidth, a camera-equipped phone or tablet, a light meter, thermometers, and a sanitizing test kit. Operators also needed to submit facility layouts, a completed permit application, a list of equipment, menus, and outlines of special preparation and storage processes. SCDHEC staff would then work virtually with the operator to verify preoperational requirements, including water temperature assessments at sinks, sufficient sanitization for dishwasher units, and suitable food holding temperatures. Inspection reports were sent to the establishment operator via email following the inspection.

SCDHEC also conducted <u>virtual nongraded Food Safety Checks</u>, which were reworked and later termed Limited Scope Inspections beginning July 1. The Limited Scope Inspections were created to coincide with the newly launched Palmetto Priority program, which allows restaurants to verify that they have taken specific protective actions to limit the risk of COVID-19 transmission. The virtual Food Safety Check verified that restaurants were taking proper steps to ensure food safety while following COVID-19 precautions. The Limited Scope Inspections are similar to Food Safety Checks but are more rigorous and are graded as pass/fail. For example, Limited Scope Inspections ask about pest control and special food processes, while Food Safety Checks did not.

# **Looking Forward**

The COVID-19 pandemic has changed how S/THAs conduct their business. In addition to assisting with response efforts, environmental health leaders need to rethink how they complete routine work while keeping field staff safe. In cases where in-person inspections are not feasible or safe, virtual inspections can be a low-risk method to ensure regulated entities are continuing to conduct business safely.

ASTHO thanks staff from the Virginia Department of Health, Hawaii Department of Health, and South Carolina Department of Health and Environmental Control for their input and review of this document. ASTHO is grateful for CDC's financial support of this work through CDC Cooperative Agreement OT18-1802, Strengthening Public Health Systems and Services through National Partnerships to Improve and Protect the Nation's Health.

