



Inspection Time Study Results

North Carolina Environmental Health Supervisors Association

TO OUR MEMBERS

Strategic Highlights

The goal of this workgroup was to put together a questionnaire that assessed what the average inspection time to perform a sanitation inspection of a food service facility was in North Carolina. This group aims to provide and promote data that could aid in the development of policy changes or suggestions to address concerns from industry. We hope to provide data that is respective across county lines and provides a non-bias examination of our Food & Lodging Programs across the state.

Membership Highlight

The inspection questionnaire that was sent out had a total of 49 county responses. This response rate is just shy of the 100 counties in North Carolina but is a majority representative sample with respect to programs that operate as health districts.

Operating Highlights

The data gathered in this questionnaire gave insight into demographics of Food & Lodging staff, technology used in the field and how local programs were administering a Quality Assurance program.

“If you can’t explain it simply, you don’t understand it well enough.” –Albert Einstein

Looking Ahead

We hope this data is received as non-biased and from a view point of curiosity, as well as hope to evaluate any potential problems that the data may show. Our group hopes that the data creates points of discussion that will lead to further review of topics such as Quality Assurance Policy and Programs, Risk Based Inspection Training, and Equity Opportunities among local county programs.

THE QUESTIONNAIRE

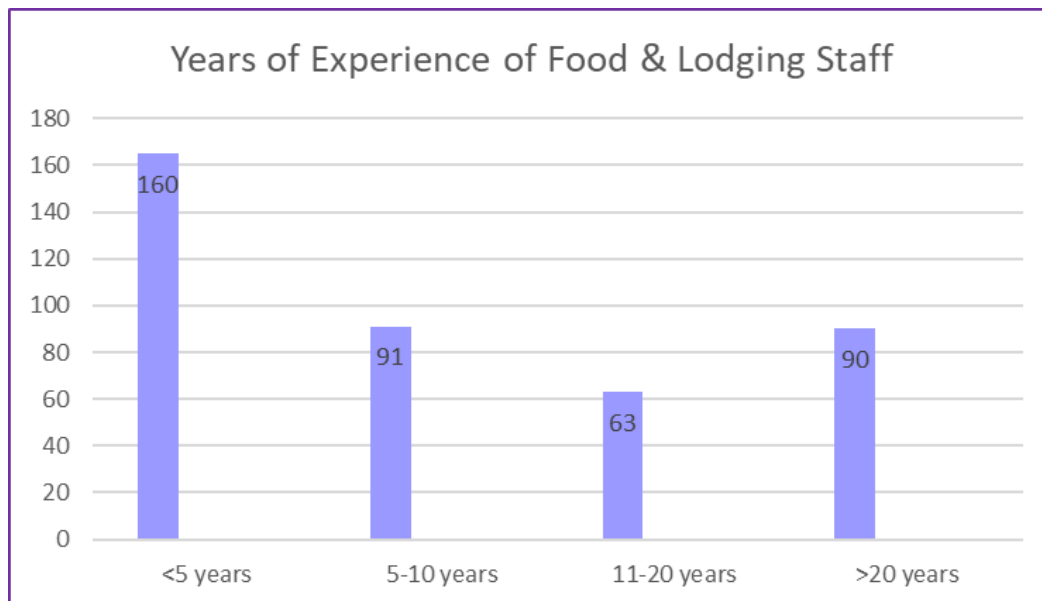
The inspection data questionnaire was submitted to local Environmental Health programs via an electronic survey form. We received a total of 49 local Food & Lodging program responses. The information provided below is a summary of those responses.

The following questions were asked on the questionnaire:

1. How many staff do you have with the following years of experience?
A) <5 yrs. B) 5-10 yrs. C) 11-20 yrs. D) >20 yrs.
2. How many inspections are staff required to do?
A) per day? B) per week? C) per Month D) Other metric used
3. Do you have an active QA program? Yes or No
4. Who Rides with Food Staff in your QA program?
A) Regional Lead B) Local Supervisor C) Other
5. Do you have a peer to peer review for QA? Yes or No
6. How much time was spent during your most recent Food and Lodging QA inspection with County staff?
A) 0.5-2.5 hrs. B) 2.5-4 hrs. C) 4-6 hrs. D) more than 6 hours E) Other
7. Average Inspection Time Category 2?
A) 0.5-2.5 hrs. B) 2.5-4 hrs. C) 4-6 hrs. D) more than 6 hours E) Other
8. Average Inspection Time Category 3?
A) 0.5-2.5 hrs. B) 2.5-4 hrs. C) 4-6 hrs. D) more than 6 hours E) Other
9. Average Inspection Time Category 4?
A) 0.5-2.5 hrs. B) 2.5-4 hrs. C) 4-6 hrs. D) more than 6 hours E) Other
10. What program do you use to complete inspections?
A) Handwrite B) CDP C) Health Space D) DHD E) Tyler Technologies
F) Bets G) Other
11. Are time Stamps auto generated and fixed by a computer program on the inspection report? Yes or No
12. Can time Stamps be changed by the EHS on the inspection report? Yes or No
13. Does your time on the inspection report encompass the inspection, writing up of the form and exit interview?
Yes or No
14. Does your time on the inspection report only encompass only the inspection and write up of the form? Yes or
No

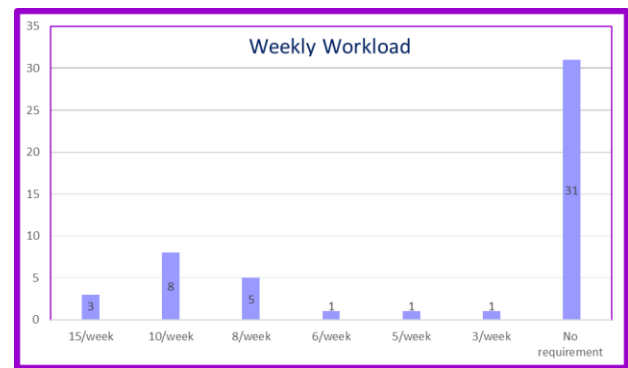
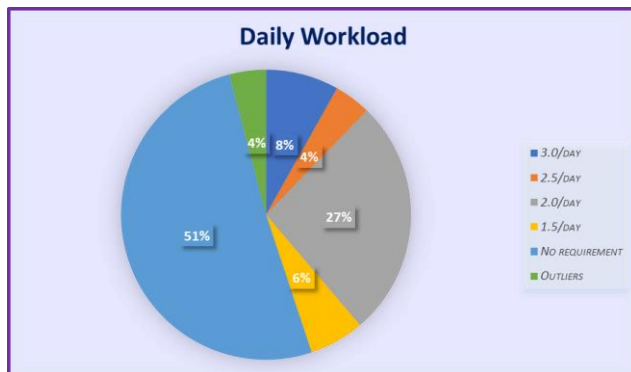
EXPERIENCE LEVEL OF STAFF

The very first question of the questionnaire addressed experience level of current Food & Lodging staff members of the local program. The total number of Environmental Health staff employed by the 49 counties that responded totaled 409 staff members. Almost half of staff were shown to have less than 5 years of experience as an Environmental Health Specialist, with about 40% of the workforce of the population surveyed reporting less than 5 years of working experience in the field. In recent years, maintaining a steady workforce has become a challenge for many programs. The COVID-19 pandemic seemed to exacerbate the retirement of our senior Environmental Health Staff; of the counties reporting to this survey, 29% reported that they did not have any Food & Lodging staff members with 20 years or more of experience and 41% reported that they have a gap of qualified staff members with 11-20 years work experience. The loss of a mixed pool of experience in the workforce and the impacts that it has on a program should be explored further. This new dynamic of increased training and increased turn over could be a leading cause to complaints from industry concerning inspection time.

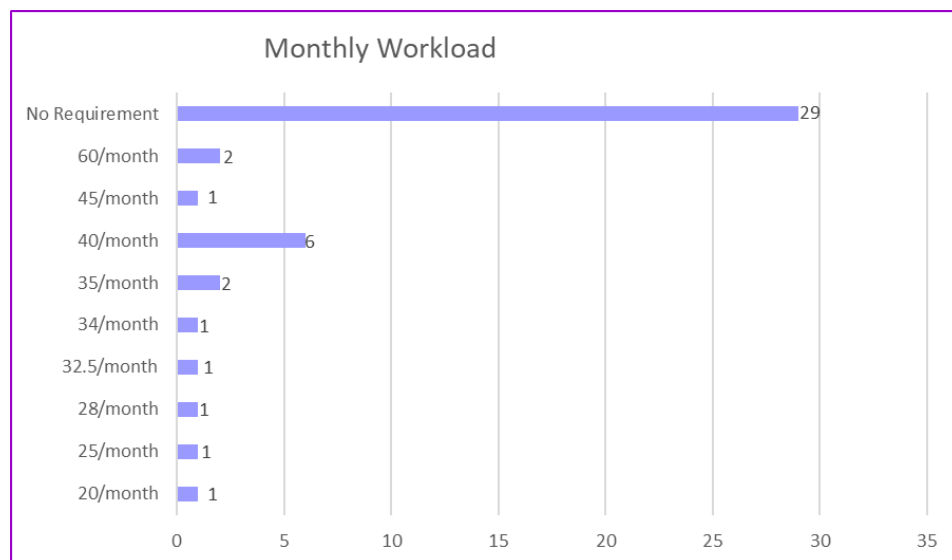


WORKLOAD OF STAFF

The daily workload of Environmental Health Specialists has long been the subject of much debate. Supervisors for years have tried to determine “how long should it take” to perform a food inspection. The questionnaire asked surveyors if there was a particular way that local programs mandated workload. The results showed that 51% of the counties that responded did not have a particular set number of inspections per day, however 27% of respondents did select that they require three (3) inspections per day quota.



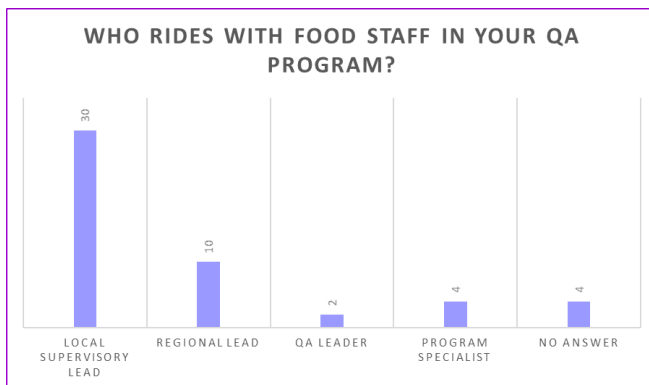
The common driving force of all work plans among the participants is to achieve the 100% compliance of risk factor category. The question of how counties achieve this category does not appear to differ that much across the spectrum according to the participants. The independence of inspectors completing the territory list seems to be the overall response observed.



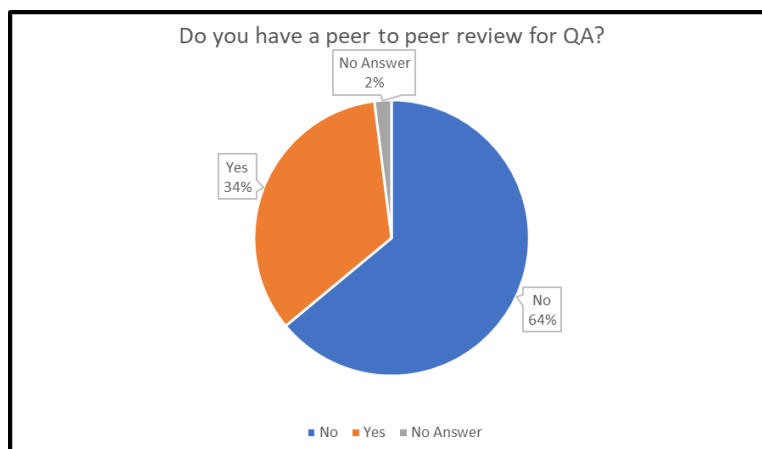
QUALITY ASSURANCE

Quality Assurance (QA) is mandated by the NCDHHS to receive the funding associated with completing the mandated inspections. As part of the Agreement Addendum (AA) that counties receive and sign every year, each county is required to provide information on their Quality Assurance program and efforts. This questionnaire asked the question, “Do you have an Active QA program,” with only 86% of the respondents answering Yes. This question needs to be further explored as to provide better insight as to why this question was not a 100% Yes when it is a required function of the county and NCDHHS AA Agreement.

There are many options on how a local program can run their Quality Assurance program. The NCDHHS gives guidance that large counties with a large number of local staff can allow Supervisors and other Environmental Health staff members designated to coordinate and provide Quality Assurance checks for their programs. However, there may be programs that the NCDHHS Regional Environmental Health Specialist will provide the quality assurance function due to the program’s size or by their choice. The data provided below gives the data on the breakdown of how our participants responded.



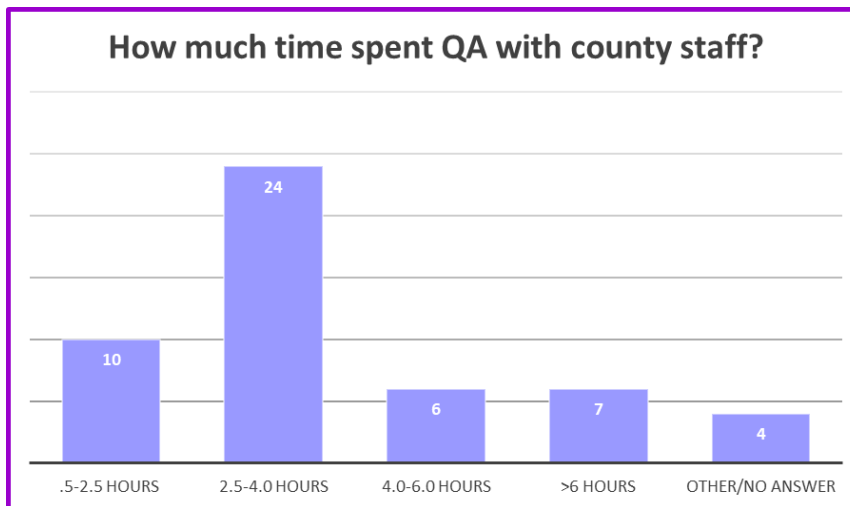
20% of our respondents who have a Quality Assurance Program rely on the NCDHHS Regional for the Quality Assurance audit ride along.



TIME

Time Spent on Quality Assurance

The data below represents the quantitative time that is spent on a QA inspection with local county staff based on how the Quality Assurance program is administered.



QA Inspections 6 hours or Greater
 2 out of 6 Regional Lead
 4 out of 6 Supervisor Lead
 1 out of 6 Program Specialist Lead

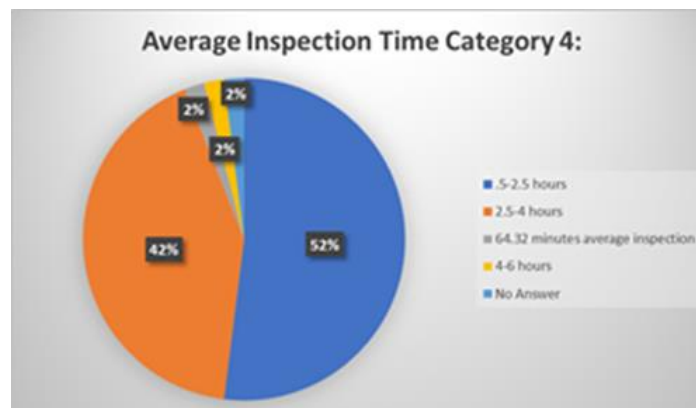
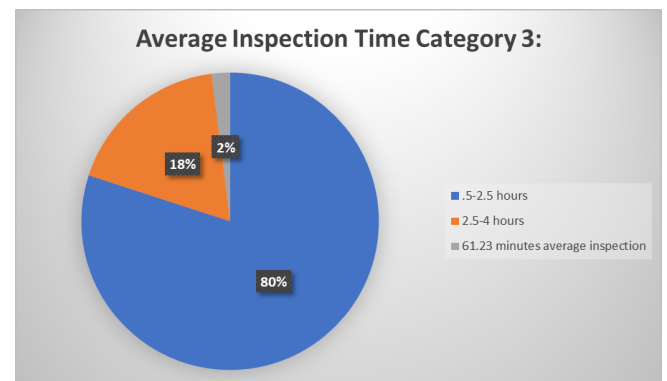
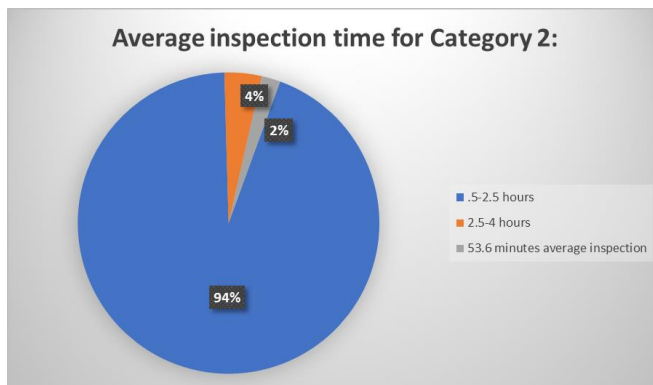
The recent question surrounding the effectiveness of the current Quality Assurance program versus the time spent on the program seems to be a fair one asked. The majority of respondents stated they spend between 2.5 to 4 hours performing a Quality Assurance inspection of their staff members.

Further exploration of this topic is needed. While the majority of the respondents answered they spend 2.5 to 4 hours on a QA inspection, this is not reflected in the overall daily inspection average of an inspector's time in and out of a restaurant. The question that must be asked is if a QA inspection is truly a reflection of an inspector's everyday performance. If you have 2% or less of all inspections surveyed taking 6 hours or longer on a non-quality audit inspection, then how does that match the data that is reflected above that 7 respondents had QA inspections lasting greater than 6 hours? Is the time spent performing a QA audit yielding the intended outcome of the program?

INSPECTION TIMES

Inspection times have recently been questioned and critiqued by industry. The inspection focus for the last decade in North Carolina has been a Risk Based Inspection. This means that our focus when entering a food service facility should be on food safety practices that impact the health and safety of the public. We long ago eliminated the back door “check the dumpster” approach. North Carolina has one the strongest food safety programs in the Southeast comparatively to other states that enforce the FDA Food Code. North Carolina officially adopted the FDA Food Code in 2012 and subsequently has made notable interpretations and adoptions of other Food Code policies since this date.

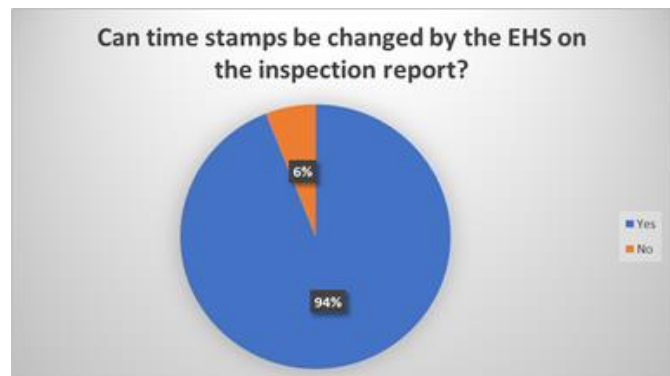
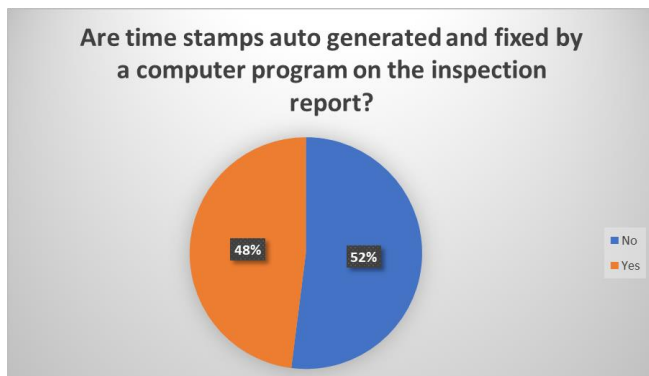
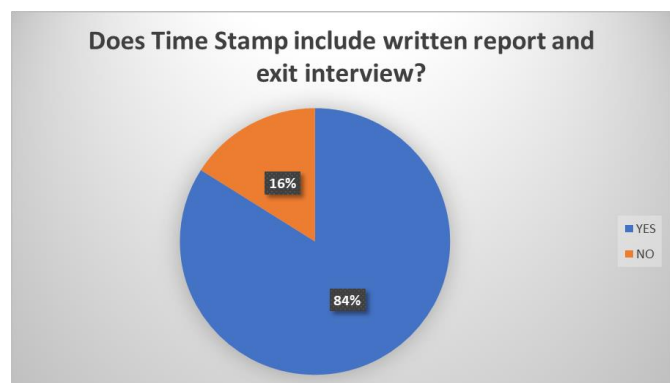
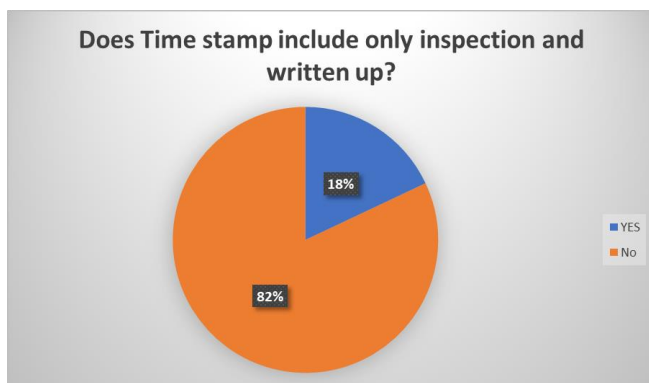
It would seem natural that going from a twenty-six-page rule book to a two-hundred-and-fifty-page Food Code manual with an annex would potentially increase inspection times in the beginning of the adoption of the code and provide for a learning curve. However, the adoption was in 2012; just recently sanitation inspections have been critiqued by those in the industry with concerns that inspections are now pushing 4 to 6 hours more frequently. The data collected below is based on the risk category of the facilities and shows the average inspection times of the respondents.



INSPECTION TIMES CON'T

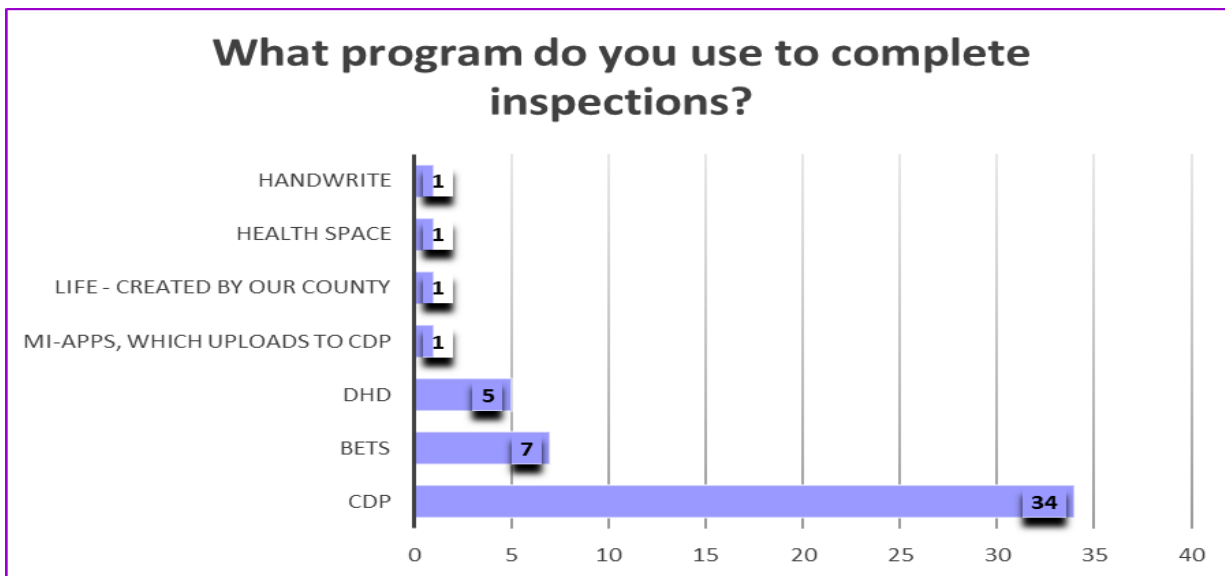
The data collected clearly shows that the average inspection time from the counties that participated average between 0.5 to 2.5 hours across all frequency types. Risk Category 4 facilities seem to be evenly split between 42% of respondents stating that their inspections last up to but not exceeding 4 hours and 52% of respondents stating that their inspections last over 4 but not exceeding 6 hours. This could be contributed to a number of factors. The criteria for being categorized as a “Category 4” facility includes food handling processes that are riskier to the public and may require additional inspections of processes such as specialized processes.

So, where do we go from here? How do we respond to the restaurant industry’s concerns for outlier inspections that last between 4 to 6 hours that make up 2% of the overall inspections reported? The data to support that shows the number of risk factor violations increase during as inspection time lengthens. This could be contributed to education of the PIC during the inspection, as well as to trying to get the violation corrected per NCDHHS guidance. During this questionnaire, more questions were raised than answered about what does the “inspection time” include? What does it mean? How does it get there? Below is data collected on “Inspection Time” interpretation.



FUNDING EQUITY

One fundamental aspect of every local inspections program that effects how well a program runs is funding. Equity among local food inspections programs is important to promote consistency. The counties represented here vary in size, program funding and staffing. A well-funded program can offer the restaurant industry different levels of service. A program that is struggling just to produce the bare minimum of inspections to be compliant may not be able to provide a Quality Assurance program, meet the required number of inspection or provide a true risk-based inspection due to the sheer demands on staff and lack of resources. Well-funded programs can provide a consistency that can cross county lines. One example of that is using a consistent computerized system for conducting food sanitation inspections. Currently, there are multiple vendor options that range in price available to local programs. Many counties in North Carolina take advantage of these vendors with varying degrees of cost and implementation of technology. Some vendors allow their programming to be used with tablets and iPads, while other vendors are simply used on a laptop. Below is the breakdown of whether our respondents are using technology to conduct their sanitation inspection.



Would industry respond favorably if all 100 counties participated in using the same software vendor to bring continuity to food service inspections? Is there Federal, State or other funding sources available to local jurisdictions for the investment in local programs to aid in offsetting the upstart cost and purchasing technology?

CONCLUSION

In conclusion, the goal of this questionnaire was met. We collected data that provided non-biased insight to inspections times across North Carolina. Our rate of participation in this study included about 50% of local jurisdictions that regulate the retail food industry. While we should always be open to professional critique and listen to the concerns that our regulatory partners raise, it is with solid data that we can confirm that the average inspection time does not exceed 4 to 6 hours. Any inspections that exceed that time frame are outliers and do not make up the majority of the inspections in North Carolina. While there are areas that need further exploration such as examining the value outcome verses the time put into Quality Assurance, looking at ways to streamline programs more consistently across county lines and equity in funding across the board, the North Carolina Environmental Health Supervisors Association is ready to meet those challenges.

The next steps for this workgroup moving forward would be developing recommendations for policy or guidance that address issues for counties such how to retain experienced staff. The data shows that there are large gaps in years of working knowledge in the field, partnerships across county lines to develop training plans and aiding counties in developing professional development of staff could help to aid in training, promote consistency across county lines and aid counties when asking for funding equity in salaries.

This workgroup could also develop policy or guidance documents to aid counties of a prioritization policy that is truly risk-based on risk factor violations, not based on risk category. The development of tools to aid counties to level workload when staffing shortages occur that promote a public health priority and based in public health science should also be considered. This workgroup can also assess the value versus the factor of staff time of the current Quality Assurance policies that are administered by the NCDHHS at the state and local levels. The Quality Assurance worksheets and supporting documents need to be evaluated for the efficacy of the overview of a county's program and if that QA program is put in place and used consistently among the state.

ACKNOWLEDGMENT

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Columbus County
Craven County
Dare County
Davidson County
Davie County
Durham County
Gaston County
Granville County
Greene County
Guilford County
Halifax County
Henderson County
Iredell County
Jackson County
Johnston County
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McDowell County
Mecklenburg County
Moore County
Nash County
New Hanover County
Onslow County
Pamlico County
Pender County
Perquimans County
Person County
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