

TIP No. 98-129-0920

PERFORMING COMMERCIAL FOOD PROTECTION AUDITS DURING COVID-19

PURPOSE

This Technical Information Paper (TIP) provides supplemental auditing procedures for use throughout the preparation and execution of Commercial Food Protection Audits during the COVID-19 Pandemic. All other technical documents relating to the performance of Commercial Food Protection Audits remain unchanged unless otherwise stated within this TIP. Actions outlined within this TIP will continue until the COVID-19 Pandemic ends or supersession, whichever comes first.

BACKGROUND

Effective 20 August 2020, Commercial Food Protection Audits should include the supplemental information provided or referenced within this TIP.

- Audits should not be scheduled before an evaluation of the risks associated with COVID-19 are performed.
- Throughout all phases of operation (e.g., planning, auditing, reporting), immediately report any suspected contact with individuals infected with COVID-19, personal illness, or any related audit difficulties to your chain of command.
- The suitability of the facility and location will be assessed based on totality of circumstances (e.g., travel restrictions, local COVID-19 outcomes, and protection/mitigation criteria of the commercial facility).

PRE-AUDIT PUBLIC HEALTH ACTIVITIES

The Public Health Activity responsible for assigning Commercial Food Protection Audits should check local, state, and national requirements for personal protective equipment (PPE) within the geographical area of responsibility (i.e., departure locality, all transient locations, and the commercial facility).

- Information on PPE requirements in the continental United States can be reviewed at the State Health Department Websites and the National Governors Association at: <https://nga.org/coronavirus/>.
- PPE in outside the continental United States locations should be in accordance with (IAW) local and host nation requirements.
- Procure PPE through normal unit supply channels.
- If there is difficulty determining PPE requirements, consult local preventive medicine personnel.

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Determine if travel is authorized. Once the risk and mitigation criteria of the geographical locations are acceptable according to local travel policy (e.g., unrestricted travel policy, accepted by the Senior Responsible Commander, or individuals with delegated authority to approve travel of Army personnel), identify and assign the appropriate auditor to perform the audit. Auditors should be verified IAW with local policy to assure they have:

- No cough or shortness of breath.
- No symptoms similar to influenza or pneumonia.
- No temperature above 100.4 degrees Fahrenheit
- Not traveled to or through affected areas within the last 14 days.
- No known close contact with anyone who has had laboratory-confirmed or symptoms consistent with COVID-19 in the last 14 days.

Perform a Site Risk Assessment (SRA) IAW the Appendix. The tasked auditor should have a conversation with facility management using the SRA.

- Send SRA to facility point of contact.
- Review the completed SRA and determine if acceptable mitigations are in place.
- If acceptable, file the SRA locally and proceed with scheduling the audit.
- If mitigations are not acceptable, update block 14 of the Veterinary Audit Report (VAR) and attach the SRA. Additionally, auditor should provide the reason why the audit cannot be performed (e.g., not authorized for travel, facility does not have appropriate COVID-19 mitigation in place, and so forth), and provide a written recommendation (e.g., delist, suspend, or delay further) to: usarmy.apg.medcom-aphc.list.food-protection@mail.mil.

PLANNING AND COORDINATION CONSIDERATIONS

Limit items taken into the facility to those essential for conducting the audit. If using a bag, keep upright to limit contact with environmental surfaces. Keep items stored away until needed. Bring hand sanitizer (with at least 60% alcohol) or wipes in case soap or hand-washing facilities are not available.

Review facility files electronically to the maximum extent possible prior to visiting the facility.

The audit team should be limited to fewest number of persons necessary to perform the audit.

Practice safe social distancing during the entire audit.

Be prepared to minimize time inside for any poorly ventilated or cooled areas of the facility.

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PPE, including face masks, gloves, and hand and surface sanitizer, should be available and secured using local supply channels prior to starting the audit.

Print all documents needed prior to conducting the audit. If a computer is not required, do not take it into the facility. If it is absolutely necessary, then carefully wipe down the complete surface frequently with agents such as alcohol or sanitary wipes

Leave all other unnecessary electronics (e.g., printers) outside the facility.

AUDIT ACTIVITIES

Upon arrival at the facility, avoid all physical contact with employees, including hand shaking. Refrain from touching one's own face, especially the mouth, eyes, and nose at all times. Find a place in the facility to practice social distancing of at least 6 feet. If loud noise is a factor, determine if there is an alternative location in the facility or a suitable place outdoors. If the auditor does not have assurance that the facility has taken necessary precautions, leave the premises and contact your commander or their designated representative. If the commander or designated representative determines that the audit cannot be completed, the auditor should update block 14 of the VAR following the same criteria provided above.

The auditor should review and discuss with the facility management their social distancing practices during the audit. The auditor should follow the facilities environmental security and safety measures to the extent they are able to if the measures do not impede the audit. If there are questions about these procedures, the auditor should contact their chain of command before proceeding. When wearing PPE, follow the sequence for donning and doffing PPE as in the Centers for Disease Control and Prevention (CDC) instructions at: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/using-ppe.html>

Wash hands with soap and water for at least 20 seconds. Use a paper towel to dry hands and turn off faucet and open doors to wash room. If soap and water are not available, use hand sanitizer (with at least 60% alcohol) upon entry into the facility.

Once at the facility, the auditor should try to remain on the premises until the end of the audit. If the auditor needs to leave and come back in order to perform a complete, comprehensive audit, follow the same disinfecting procedures as necessary upon arrival. Remember to wash your hands before and after any breaks. Use hand sanitizer (with at least 60% alcohol) throughout the audit.

During the audit, hand washing or hand sanitizing (with at least 60% alcohol) should occur at frequent intervals including after any contact with surfaces touched by other individuals, review of records, and observations of areas with employees.

The facility should use their own pen when signing documents. If possible, use agents such as alcohol or sanitary wipes to wipe down hard surfaces (e.g., desks and conference room tables) before placing anything such as records and audit references on them. Review the U.S. Environmental Protection Agency's (EPA) List N of disinfectants to determine the efficacy and instructions for disinfectants against COVID-19.

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Try to refrain from placing audit references and notes, your pen, or any other inspection equipment on any surface.

Back and forth sharing of documents and other inspection items should be limited where possible. When handling or presenting documents or other shared surfaces, such as computers, use gloves and then wash and sanitize hands after. Try to set documents down, and take steps back for the facility representative to then pick up. If there is no place to set documents, avoid hand-to-hand contact. Refrain from using unnecessary items such as clipboards, folders, and files. If such items are required, refrain from passing them around between persons.

Each day, prior to leaving the facility, wash your hands. Use hand sanitizer (with at least 60% alcohol) prior to entering your car. Auditors should also wipe off their audit equipment such as pens, flashlights, hard covers of reference material, and other hard surfaces exposed in the facility with agents such as alcohol or sanitary wipes. This includes any personal items taken into the facility.

POINT OF CONTACT

All inquiries for this TIP may be forwarded to the Food Protection Branch, Food Protection & Public Health Sanitation Division, U.S. Army Public Health Center, via email:

usarmy.apg.medcom-aphc.list.food-protection@mail.mil

**APPENDIX
SITE RISK ASSESSMENT FORM**

Thank you for helping us assess the risk associated with the important work our auditors will be performing at your facility. To help us assess the risk associated with entering your facility as related to COVID-19, please complete the following form and return at your earliest convenience

| Site Risk Assessment | | |
|--|--|---|
| Date Assessment Completed: | | Source of facility access information (Website? Email? Safety Officer?) Please provide specifics and date when information was obtained: |
| Assessment Form Completed By: | | |
| Facility Location | | |
| Facility Name | | |
| Street Address | | |
| City, State, Country, Zip: | | |
| Facility Contact Information | | |
| Name of Contact Person: | | |
| Contact Phone Number | | |
| Contact Email: | | |
| Facility Access Information Questions (YES/NO, in details): | | |
| 1. Are there any restrictions in place for access to your facility? (If yes, please describe) | | |
| 2. Do you have any restrictions or anticipate delays in operations during this time? | | |
| 3. Have you had any positive cases of SARS-CoV-2 (COVID-19) or presumed positive cases at your facility over the past 14 days? | | |

Site Risk Assessment

4. What measures are being taken to maintain a clean environment at your facility and reduce transmission risk?

5. Are you using CDC-recommended disinfectants for janitorial services (i.e., EPA-registered disinfectants)?

6. Is your facility regularly disinfecting frequently touched surfaces in common areas? How often?

7. Do you have a protocol for facility employees to maintain social distancing?

8. How are you monitoring employees and what guidance is being given regarding facility employees presenting with symptoms?

9. Does your location have disposable gloves and disinfectant readily available for employees to disinfect working surfaces and equipment?

10. Does your location require employees to wear appropriate facial coverings when they cannot maintain a 6 foot distance from other individuals?

11. If individuals with whom auditors come in close contact with (within 6 feet for more than 10 minutes) present symptoms and are suspected/ confirmed to have contracted COVID-19 at a later date, how will your facility perform notification to the auditor?