

Food, Pools, and Lodging Services in Minnesota

2016 STATEWIDE PERFORMANCE MEASURES

Food, Pools, and Lodging Services in Minnesota 2016 Statewide Performance Measures

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Contents

Executive Summary	3
Introduction	4
The Minnesota FPLS System	4
2016 FPLS Statewide Performance Measures	4
Statewide Results Highlights	5
Data Limitations and Challenges	6
FPLS Staff Qualifications Data	7
On-Time Inspections Data	8
Engagement and Outreach Data	9
Statewide Food Activities	9
Statewide Lodging Activities	10
Statewide Pools Activities	11
Statewide Manufactured Home Parks and Recreational Campgrounds Activities	12
Statewide Youth Camp Activities	13
Cited Food Violation Data	14
Continuous Improvement Plans	15

Executive Summary

The Environmental Health Continuous Improvement Board (EHCIB)

[\(http://www.health.state.mn.us/divs/eh/local/cib/\)](http://www.health.state.mn.us/divs/eh/local/cib/) approaches its initiatives with a statewide vision of partnership, collaboration, transparency, continuous improvement, and communication. The collection of statewide food, pools, and lodging services (FPLS) performance measures is one initiative that helps realize this vision. It is a way to collaboratively assess statewide performance and identify statewide opportunities for improvement. What distinguishes the FPLS statewide performance measures from FPLS program evaluation is that they describe statewide, system performance whereas the FPLS program evaluation is used to review individual program performance.

The EHCIB piloted the statewide FPLS performance measures and data collection process in 2017, collecting 2016 data. The Minnesota Department of Health (MDH), the Minnesota Department of Agriculture (MDA), and locally delegated FPLS programs submitted 2016 data in April-May 2017. Only one local FPLS program did not report data.

Statewide reporting on 2016 FPLS performance measures was successful. The overall response rate was excellent and the data provide, for the first time, a statewide picture of FPLS in Minnesota. It is the closest Minnesota has come to a statewide picture of FPLS, even with limitations. The EHCIB is committed to collecting FPLS statewide performance measures and continuously improving the measures, process, and ultimately ensuring food safety in Minnesota.

The following are key highlights from the 2016 FPLS Statewide Performance Measure data:

- Most Minnesota FPLS inspection staff are registered as environmental health sanitarians
- Less than half of Minnesota FPLS inspection staff are standardized in food inspections
- Most inspections are completed on time
- Most Minnesota FPLS programs are doing some engagement and outreach activities, though some areas (e.g., youth camps) receive less activity than others
- Most cited violations fall within two Centers for Disease Control and Prevention (CDC)/Food and Drug Administration (FDA) foodborne illness risk factor categories: improper holding/time and temperature and contaminated equipment/protection from contamination risk.

Reporting on 2016 FPLS statewide performance measures identified data limitations and challenges, including:

- County-level data was difficult to obtain from multi-jurisdictional programs and, in some cases, led to duplicative data;
- On-time inspection data was obtained using two sampling methods, which may contribute to inconsistencies;
- Cited food violations data was reported using counts and did not have denominators, which limits data analysis; and
- Some programs' data had to be excluded from the statewide analysis due to incompleteness.

The EHCIB proposes the following actions based on the process of collecting 2016 performance measures and their data limitations and challenges:

- FPLS statewide performance measures will not be collected in 2018 (2017 data year). Instead, time will be used to gather feedback from FPLS programs and to improve the measures and data collection process for 2019 (2018 data). Ideas for improvement already noted include:
 - Report data by program rather than county; and
 - Provide scenarios and better explanations in the reporting instructions.
- Further review the 2016 results and recommend areas for statewide improvement. Ideas noted to date include:
 - Improve the percent of FPLS inspection staff who are standardized in food inspections; and

- Improve youth camp education and outreach efforts.

Introduction

The Environmental Health Continuous Improvement Board (EHCIB)

(<http://www.health.state.mn.us/divs/eh/local/cib/>), originally chartered by the Local Public Health Association (LPHA) and the Minnesota Department of Health (MDH), began meeting in 2014 “to fundamentally advance Minnesota’s state-local partnership in Environmental Health.” The EHCIB agreed to initially work on Food, Pools, and Lodging Services (FPLS) challenges, and then work to monitor and advance state-local work in the broader area of environmental health. In March of 2017, the EHCIB became a workgroup of the State Community Health Services Advisory Committee (SCHSAC), to ensure its work and recommendations are acknowledged and supported by Minnesota’s state-local public health partnership.

The EHCIB approaches its initiatives with a statewide vision of partnership, collaboration, transparency, continuous improvement, and communication. The collection of statewide FPLS performance measures is one initiative that helps realize this vision. It is a way to collaboratively assess statewide performance and identify statewide opportunities for improvement.

The EHCIB piloted the statewide FPLS performance measures and data collection process in 2017, collecting 2016 data. The MDH, the Minnesota Department of Agriculture (MDA), and locally delegated FPLS programs submitted 2016 data in April-May 2017. This report presents that data, suggests lessons learned, and recommends plans for improvement.

The Minnesota FPLS System

In Minnesota, it is the State’s responsibility to assure compliance with State statute, laws, rules, and codes meant to protect public health. To do this in the FPLS system, the MDH and MDA work in partnership with local health departments through delegation agreements. These delegation agreements pass the responsibility to license and inspect food, beverage, and lodging establishments, manufactured home parks, recreational camping areas, public swimming pools, and youth camps to the delegated jurisdictions. Delegated jurisdictions can cover cities, counties, or multiple counties. In local jurisdictions without delegation agreements, the MDH and MDA do the licensing and inspecting of the above-named entities.

All FPLS programs conduct periodic self-assessments and receive a program evaluation to ensure minimum standards are in place. The EHCIB formed a [FPLS Program Evaluation Workgroup](http://www.health.state.mn.us/divs/eh/local/cib/process/charter.pdf) (<http://www.health.state.mn.us/divs/eh/local/cib/process/charter.pdf>) to improve the FPLS program evaluation process. The FPLS statewide performance measures are NOT the same as FPLS program evaluation. The FPLS statewide performance measures describe statewide, system performance whereas the FPLS program evaluation is for individual program performance.

To further illustrate how Minnesota’s FPLS System is protected, the MDH provides an [interactive map of state and local FPLS delegated agencies](http://www.health.state.mn.us/divs/eh/food/license/delegation.html) (<http://www.health.state.mn.us/divs/eh/food/license/delegation.html>).

2016 FPLS Statewide Performance Measures

After a statewide vetting process, completed in the fall 2016, the EHCIB adopted the measures in **Table A** for the pilot year. Key considerations were that the measures be: informative and actionable statewide; in alignment with the FDA food program standards; and feasible for all FPLS programs to collect and report.

Input showed that the measures reflected important aspects of FPLS in MN but feasibility to report on the measures varied. Therefore, some measures were optional to allow FPLS programs statewide to test their ability to report them. More details about how the measures were reported is available in the [2017 Instructions for Reporting \(PDF\)](http://www.health.state.mn.us/divs/eh/local/cib/measures/instructions.pdf) (<http://www.health.state.mn.us/divs/eh/local/cib/measures/instructions.pdf>).

The 2016 FPLS statewide performance measures were reported by county or, in some cases, city (in the case of cities with a delegation agreement). During this pilot year of data collection, 86 counties and 15 cities reported data. Only one local FPLS program did not report data.

Table A. FPLS Statewide Performance Measures

Required Reporting Elements	Developmental (Optional) Reporting Elements
<p>FPLS Staff Qualifications</p> <ul style="list-style-type: none"> ▪ % of FPLS inspection staff who are registered sanitarians (REHS) in MN ▪ % of FPLS inspection staff qualified to sit for the REHS exam within 2 years of hire ▪ % of FPLS inspection staff who are standardized in food inspections <p>Rationale/Benefit: Provides a picture of the FPLS workforce and may drive workforce development planning.</p>	<p>Engagement and Outreach Efforts</p> <ul style="list-style-type: none"> ▪ Types of industry and consumer engagement activities completed for FPLS ▪ Types of education and outreach activities completed for FPLS <p>Rationale/Benefit: Shows the type of engagement and outreach most commonly completed and may drive education and communication planning.</p>
<p>On-Time Inspections</p> <ul style="list-style-type: none"> ▪ % of food inspections completed on time ▪ % of lodging inspections completed on time ▪ % of pool inspections completed on time ▪ % of manufactured home park and recreational campground inspections completed on time ▪ % of youth camp inspections completed on time <p>Rationale/Benefit: Provides a better understanding of inspection timeliness that could lead to further analysis and improvement efforts.</p>	<p>Food Violations</p> <ul style="list-style-type: none"> ▪ Most frequent food violations (that are risk factors for foodborne illness) cited during inspections <p>Rationale/Benefit: Provides a picture of foodborne illness risk and could help focus prevention efforts.</p>

Statewide Results Highlights

The following are key highlights of the 2016 FPLS Statewide Performance Measure data:

- Most Minnesota FPLS inspection staff are registered as environmental health sanitarians
- Less than half of Minnesota FPLS inspection staff are standardized in food inspections
- Most inspections are completed on time
- Most Minnesota FPLS programs are doing some engagement and outreach activities, though some areas (e.g., youth camps) receive less activity than others

- Most cited violations fall within two Centers for Disease Control and Prevention (CDC)/Food and Drug Administration (FDA) foodborne illness risk factor categories:
 - Improper holding/time and temperature
 - Contaminated equipment/protection from contamination risk

Data Limitations and Challenges

Statewide reporting on the 2016 FPLS statewide performance measures was successful. The overall response rate was excellent and the data provide, for the first time, a statewide picture of FPLS in Minnesota. However, the EHCIB recognizes the measures show a snapshot in time, not the steady state of FPLS, and that reporting the data was not without its challenges. The following list is an overview of the main data limitations and challenges. The EHCIB intends to continuously improve the FPLS statewide performance measures and will gather feedback about how to best overcome these data challenges and improve data collection in the future.

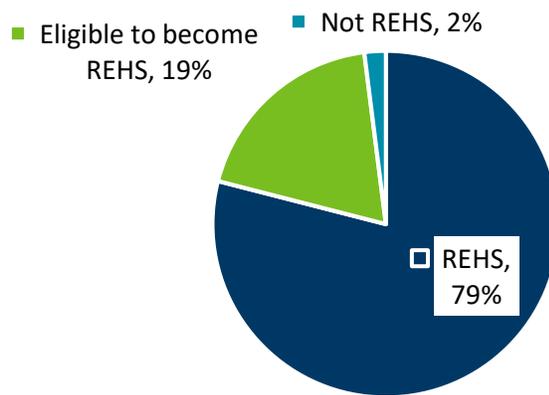
- County-level data was difficult to obtain for programs that cover multiple counties. Some programs were unable to report their staffing and engagement/outreach data by county. This resulted in duplicative, overlapping, and/or incomplete data reported. Due to this, the true denominator or “n” for this data is not available. However, the data distribution (%) is unaffected by this limitation.
- On-time inspection data was obtained using two sampling methods: random sample and total sample. Data suggest the random sample approach may not be as accurate, suggested by the lack of observed variation when compared to the total sample approach.
- Cited food violations data was reported using counts. Since the data do not identify the number of inspections the violations come from, the data lack a true denominator. Because of this, data analysis is limited to ranking by counts, and masks the possibility that multiple violations were observed at a given inspection.
- Not all programs were able to submit the cited food violations data at the requested granularity, so some programs’ data had to be excluded from the statewide analysis.

FPLS Staff Qualifications Data

The MDH FPLS Delegation Agreement requires that inspections of regulated establishments be conducted by registered environmental health specialists/registered sanitarians (REHS/RS). REHS/RS are college graduates with training in environmental health, sanitary science, sanitary engineering, or other related environmental fields. FPLS programs may also employ inspectors who are eligible to sit for the REHS/RS exam within two years of hire.

Standardization in food inspections is not a requirement of inspectors in Minnesota; however, it is considered a best practice that improves the quality and consistency of food inspections.

Minn. FPLS inspection staff who are...



FPLS staff qualifications statewide results include data provided by the MDH, MDA, and locally delegated FPLS programs.

Forty-five percent (45%) of Minnesota FPLS inspection staff are standardized in food inspections.

On-Time Inspections Data

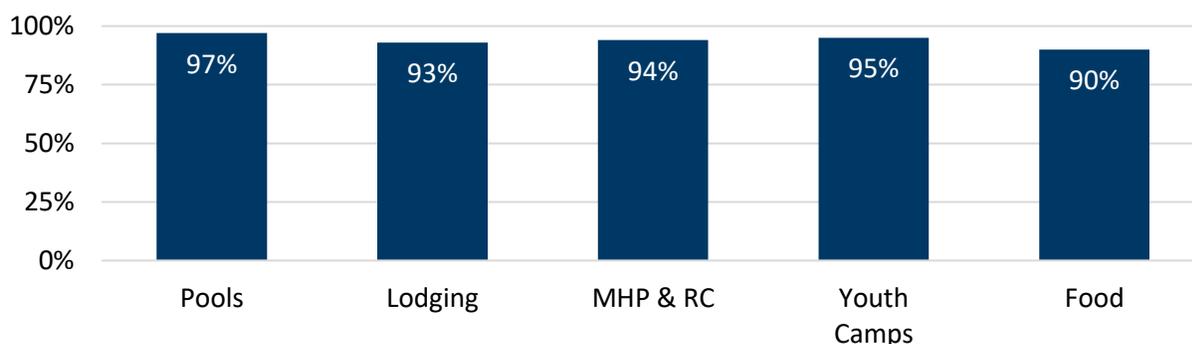
Timely completion of FPLS inspections helps maintain and improve the health of all Minnesotans. Documentation of inspection frequency is recommended in the United States Food and Drug Administration [Voluntary National Retail Food Regulatory Program Standards, Standard Number 4 – Uniform Inspection Program \(PDF\)](http://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/ProgramStandards/UCM372499.pdf) (<http://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/ProgramStandards/UCM372499.pdf>).

Table B outlines the definition of “on time.”

Table B. Definition of on-time inspection

Establishment Type / Risk Category	Maximum No. of Days between Inspections to be Considered On-Time
High risk food, lodging and pool establishments	395
Youth camps	395
Category A (high-risk) manufactured home parks and recreational campgrounds	395
Medium-risk food, lodging and pool establishments	578
Low-risk food, lodging and pool establishments	760
Category B (low-risk) manufactured home parks and recreational campgrounds	760

Inspections completed on time in Minnesota, 2016



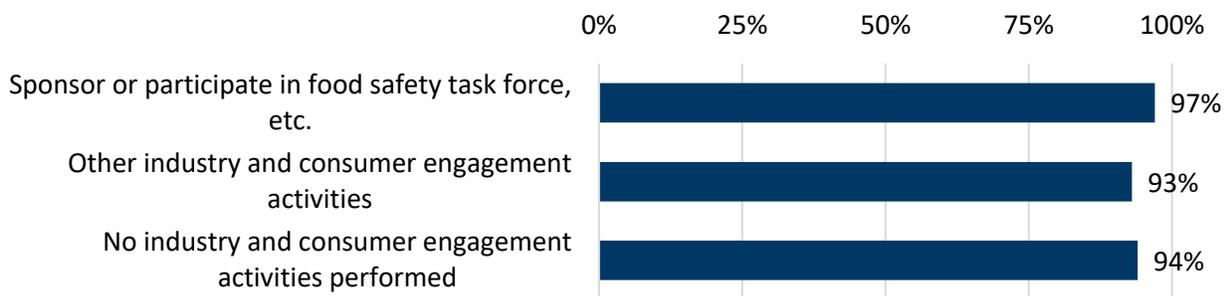
FPLS on-time inspections statewide results include data provided by the MDH, MDA (for food only), and locally delegated FPLS programs.

Engagement and Outreach Data

The United States Food and Drug Administration [Voluntary National Retail Food Regulatory Program Standards, Standard Number 7 – Industry and Community Relations \(PDF\)](https://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/ProgramStandards/UCM372523.pdf) (<https://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/ProgramStandards/UCM372523.pdf>) recommends FPLS programs participate in engagement and outreach activities in order to enhance communication and improve outcomes. It also serves as a way for FPLS programs to better understand their customer interactions.

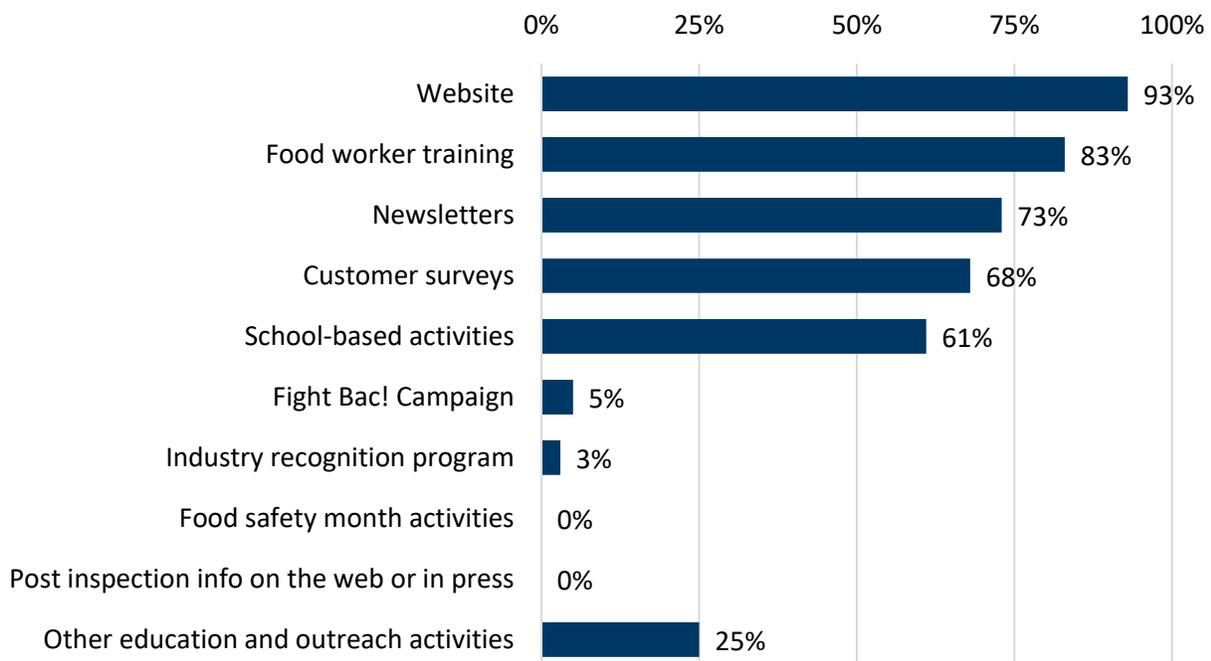
Statewide Food Activities

Industry and consumer engagement, Minnesota, 2016
Statewide food activities



FPLS statewide food activities results include data provided by the MDH, MDA, and locally delegated FPLS programs.

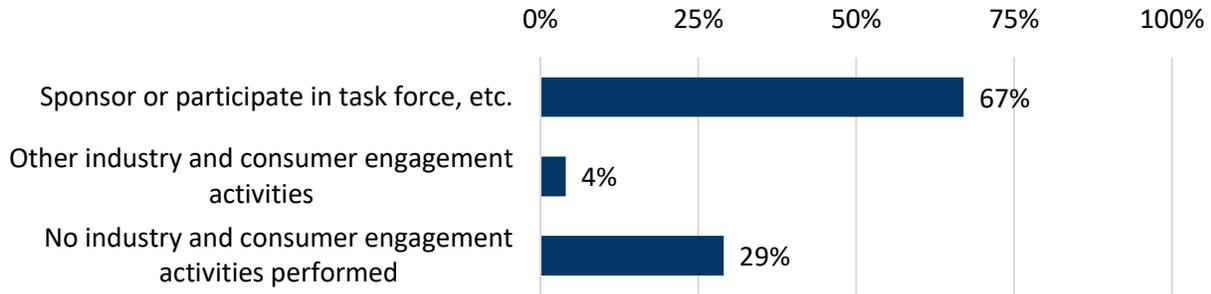
Education and outreach, Minnesota, 2016
Statewide food activities



Statewide Lodging Activities

Industry and consumer engagement, Minnesota, 2016

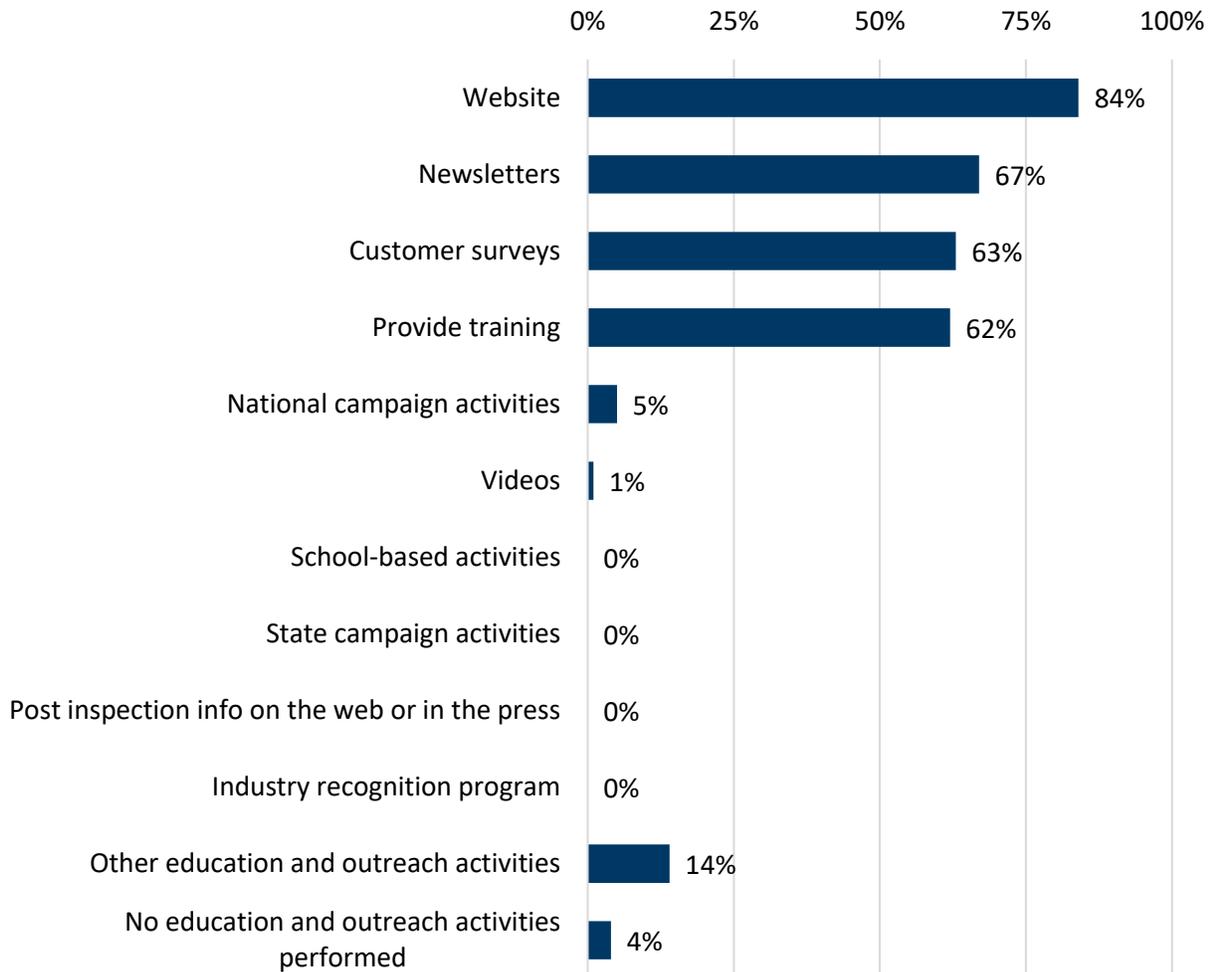
Statewide lodging activities



FPLS statewide lodging activities results include data provided by the MDH and locally delegated FPLS programs.

Education and outreach, Minnesota, 2016

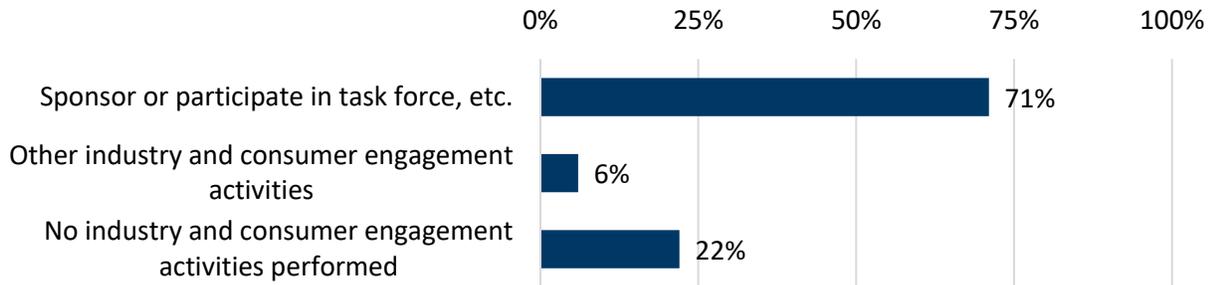
Statewide lodging activities



Statewide Pools Activities

Industry and consumer engagement, Minnesota, 2016

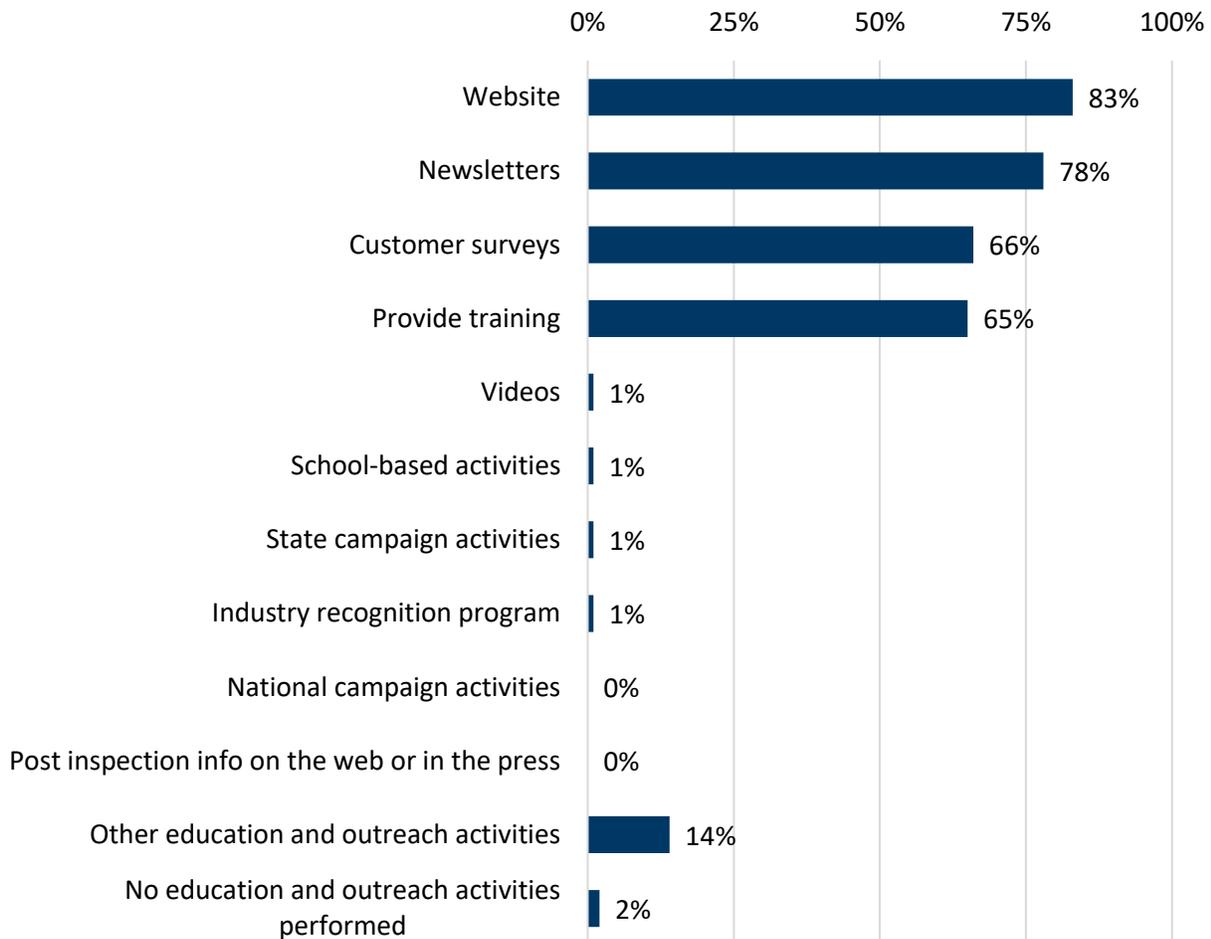
Statewide pools activities



FPLS statewide pools activities results include data provided by the MDH and locally delegated FPLS programs.

Education and outreach, Minnesota, 2016

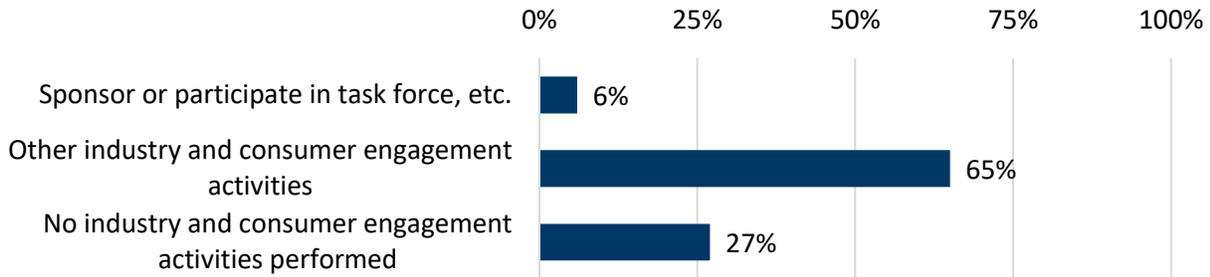
Statewide pools activities



Statewide Manufactured Home Parks and Recreational Campgrounds Activities

Industry and consumer engagement, Minnesota, 2016

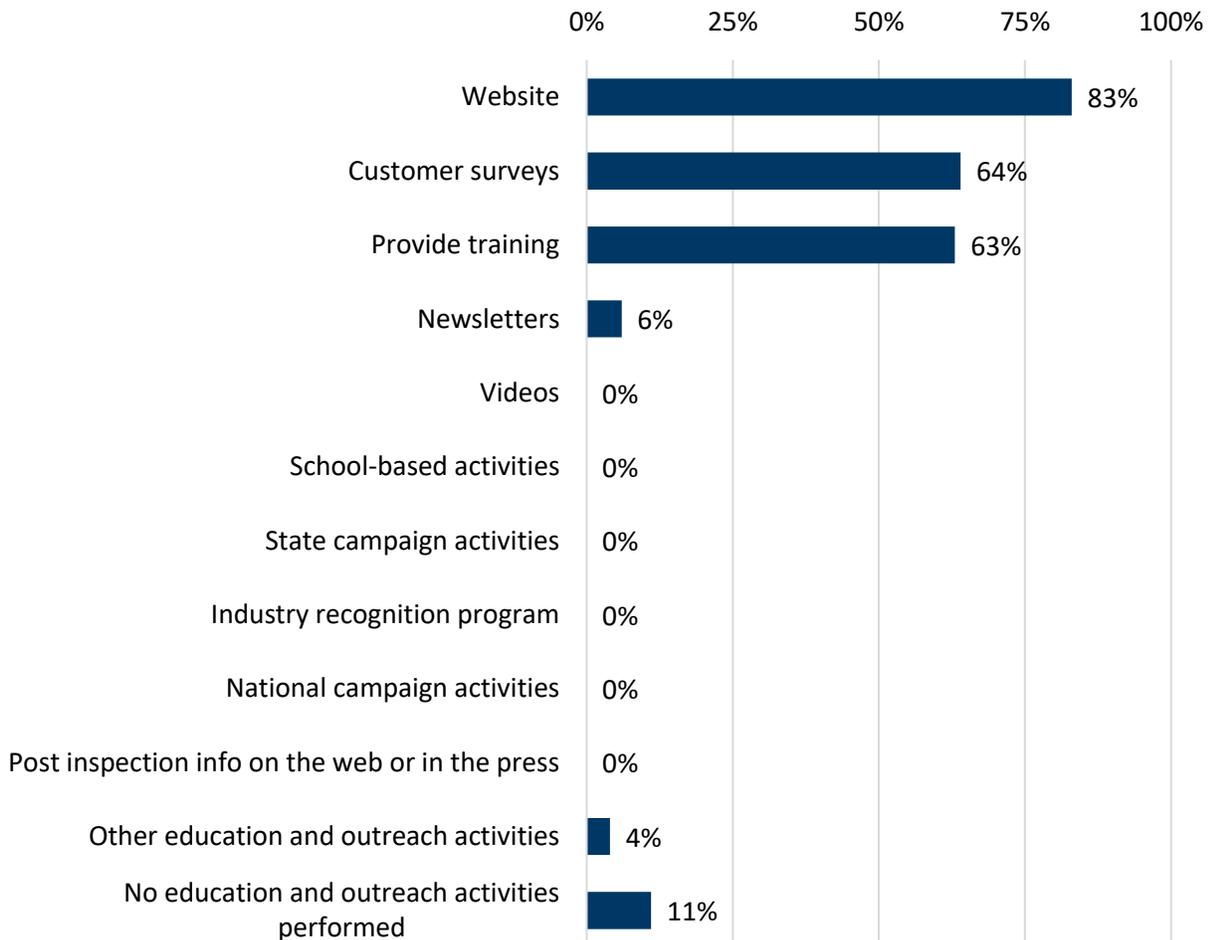
Statewide manufactured home parks and recreational campgrounds activities



FPLS statewide manufactured home parks and recreational campgrounds activities results include data provided by the MDH and locally delegated FPLS programs.

Education and outreach, Minnesota, 2016

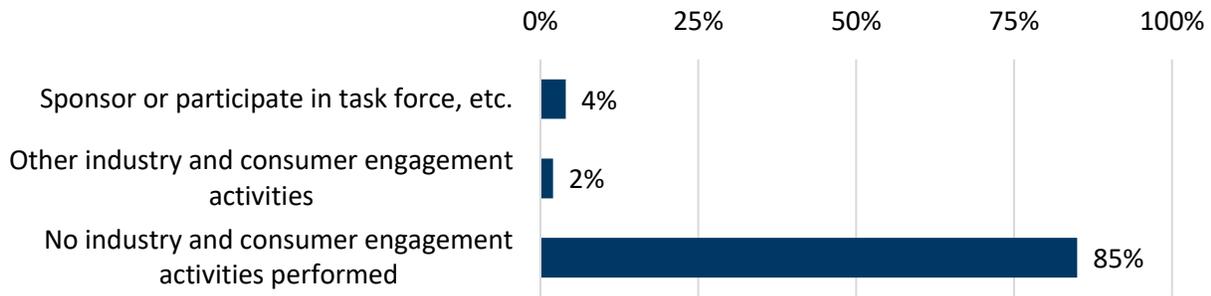
Statewide manufactured home parks and recreational campgrounds activities



Statewide Youth Camp Activities

Industry and consumer engagement, Minnesota, 2016

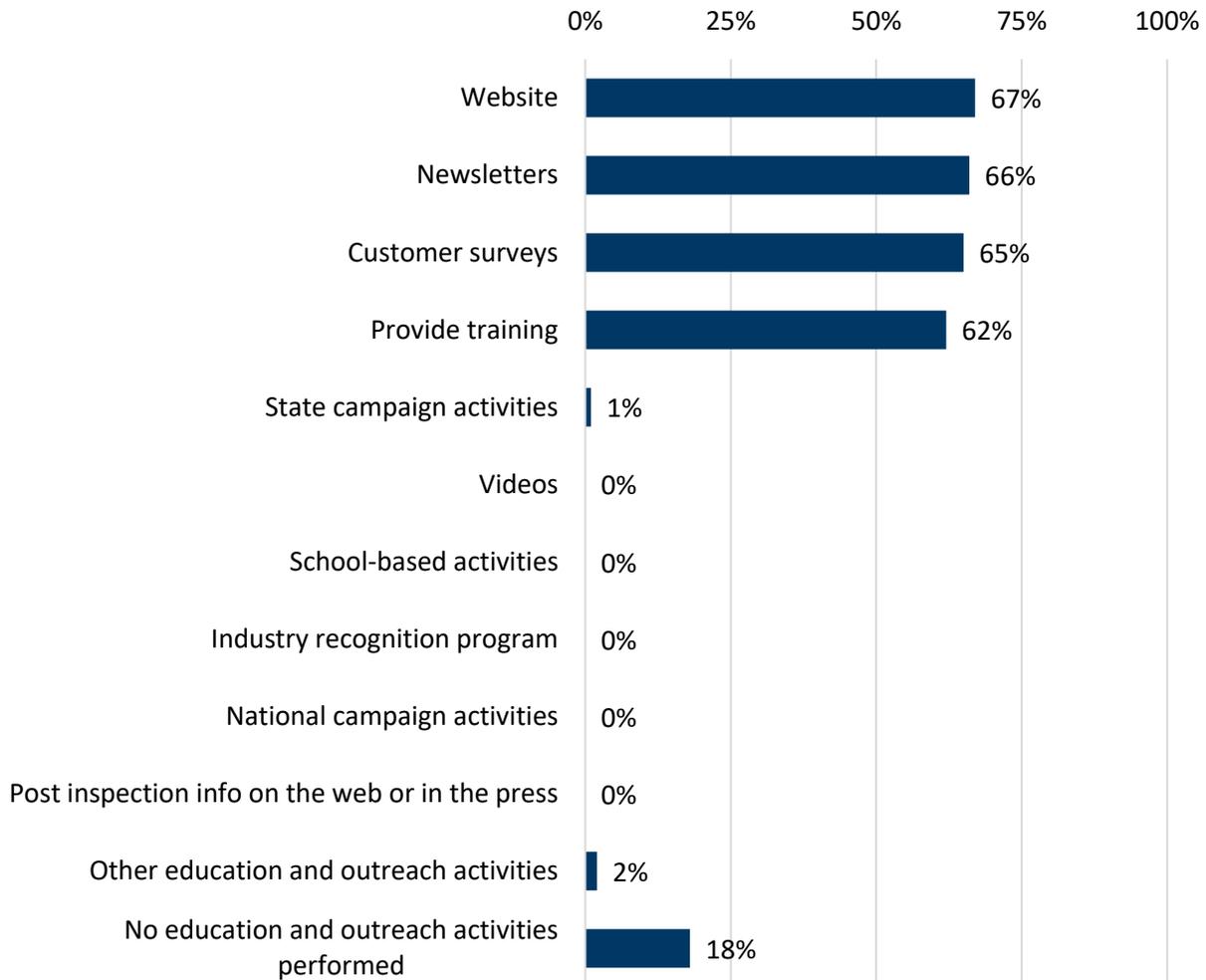
Statewide youth camp activities



FPLS statewide youth camps activities results include data provided by the MDH and locally delegated FPLS programs.

Education and outreach, Minnesota, 2016

Statewide youth camp activities



Cited Food Violation Data

The ultimate goal of FPLS programs is to protect the public's health by preventing risk factors that can cause illness. The United States Centers for Disease Control and Prevention (CDC) and Food and Drug Administration (FDA) identify the following top five risk factors that are most often responsible for foodborne illness outbreaks:

- Food from Unsafe Sources
- Inadequate Cooking
- Improper Holding/Time and Temperatures
- Contaminated Equipment/Protection from Contamination Risk
- Poor Personal Hygiene

In addition, Minnesota also recognizes the contribution employee illness can have in foodborne illness outbreaks. Therefore, this data includes food violations that pertain to the top five risk factors and employee illness.

Results from the 2016 FPLS statewide performance measures show that the most frequently cited food violations fall within two CDC/FDA foodborne illness risk factor categories: improper holding/time and temperature and contaminated equipment/protection from contamination risk.

Table C. Top Cited Food Violations, Minnesota, 2016

FPLS statewide cited food violations results include data provided by the MDH, MDA, and locally delegated FPLS programs.

Count	Standard Order Text	Minn. Food Code/Section	CDC Foodborne Illness Risk Factor
3,727	Maintain all cold at 41 degrees F or below	4626.0395/ 3-501.16B	Improper Holding/Time and Temperature
2,650	Employ a full-time state certified food manager	4626.2010/ 1-101.01MN	N/A
2,044	Equipment surfaces and utensils clean	4626.0840/ 4-601.11A	Contaminated Equipment/Protection from Contamination Risk
1,446	Mark date of prep on all refrigerated, ready-to-eat foods	4626.0400/ 3-501.17A	Improper Holding/Time and Temperature
1,233	Clean surfaces contacting food	4626.0845/ 4-602.11E	Contaminated Equipment/Protection from Contamination Risk
1,196	Separate raw animal foods from raw ready-to-eat or raw food and veggies	4626.0235/ 3-302.11A	Contaminated Equipment/Protection from Contamination Risk
1,038	Person in charge reporting all diarrhea or vomiting by employees	4626.0060/ 2-201.15B	N/A
1,037	Use dispensing equipment to limit direct contact with food or ice	4626.0225/ 3-301.11	Poor Personal Hygiene

Count	Standard Order Text	Minn. Food Code/Section	CDC Foodborne Illness Risk Factor
947	Separate raw animal foods from raw and cooked ready-to-eat foods	4626.0235/ 3-302.11A1	Contaminated Equipment/Protection from Contamination Risk
902	Maintain hot at 140 degrees F or above	4626.0395/ 3-501.16A	Improper Holding/Time and Temperature

Continuous Improvement Plans

This is the closest Minnesota has come to a statewide picture of FPLS and, while peppered with imperfections, overall it was a successful pilot of the statewide performance measure development, data collection process, data analysis and reporting continuum. It is worth continuing to improve. The EHCIB is committed to regularly collecting FPLS statewide performance measures and continuously improving the measures and process.

Based on the 2016 FPLS statewide performance measures results and data limitations and challenges, the EHCIB plans to do the following:

- FPLS statewide performance measures will not be collected in 2018 (2017 data year). Instead, the time will be used to gather feedback from FPLS programs and to improve the measures and data collection process for 2019 (2018 data). Ideas for improvement already noted include:
 - Report data by program rather than county; and
 - Provide scenarios and better explanations in the reporting instructions (e.g., clarify the FPLS staff to include/exclude from reporting of the staff qualifications measures).
- Evaluate the results and recommend statewide improvement efforts. Ideas noted so far include:
 - Improve the percent of FPLS inspection staff who are standardized in food inspections; and
 - Improve youth camp education and outreach efforts.