

# Food, Pools, and Lodging Services in Minnesota

2018 STATEWIDE PERFORMANCE MEASURES

## Food, Pools, and Lodging Services in Minnesota 2018 Statewide Performance Measures

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# Executive Summary

The Environmental Health Continuous Improvement Board (EHCIB) approaches its initiatives with a statewide vision of partnership, collaboration, transparency, continuous improvement, and communication. <https://www.health.state.mn.us/ehcib>

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. In March-April 2019, the Minnesota Department of Health (MDH) and locally delegated agencies submitted 2018 data for on-time inspections; MDH, the Minnesota Department of Agriculture (MDA) and locally delegated agencies submitted staffing data. Again, only one local FPLS agency did not report data.

The following are key highlights from the 2018 FPLS Statewide Performance Measure data:

- Most Minnesota FPLS inspectors are registered as environmental health sanitarians. Those that were not registered are qualified to sit for the exam within two years of hire. This is an improvement from 2016 results.
- The percent of Minnesota FPLS inspectors standardized in food inspections increased in 2018 as compared to 2016.
- Most inspections are completed on time, with little change between 2016 and 2018.

After reporting in 2017, the EHCIB recommended the addition of qualitative information to supplement information learned through reporting. Statewide discussions were held with MDH, MDA, locally-delegated agency representatives, and local public health representatives from non-delegated agencies. Highlights from those discussions include themes related to improving communication, training needed for food staff and the need for increased transparency.

The EHCIB proposes the following actions based on the results of collecting 2018 performance measures:

- Explore developing a composite measure to show the value of food establishment inspections. This includes exploring a consumer-friendly measure to help the public understand the value of having safe retail food in MN.
- Create a template “food establishment satisfaction survey,” which could be modified by specific agencies, but includes 3-5 standard questions encouraged for use statewide.
- Monitor inspector staffing qualifications data to ensure we maintain improvements.
- Continue to improve the relationship between MDH and local public health.
- Broaden efforts to improve the state-local relationship by focusing on partnerships between state inspection staff and non-delegated local public health departments.

## Introduction

The Environmental Health Continuous Improvement Board (EHCIB), 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.”

<https://www.health.state.mn.us/ehcib>

The EHCIB agreed to initially work on Food, Pools, and Lodging Services (FPLS), 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 statewide FPLS performance measures 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. They repeated the data collection process in 2019, collecting 2018 data on a revised set of measures. In 2019, MDH and locally delegated agencies submitted 2018 data for on-time inspections; MDH, MDA and locally delegated agencies submitted staffing data. 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 agencies conduct periodic self-assessments and receive a program evaluation to ensure minimum standards are in place. The EHCIB formed a FPLS Program Evaluation Workgroup to improve the FPLS program evaluation process.

<https://www.health.state.mn.us/communities/environment/local/docs/ehcib/process/charter.pdf>

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 a map of State and Local Environmental Health Delegated Agencies:

<https://www.health.state.mn.us/communities/environment/food/license/delegation.html>

## 2018 FPLS Statewide Performance Measures

After completing reporting in 2017 on 2016 data, the EHCIB reviewed the performance measures (**Table A**) to determine which to retain for future reporting and considered other ways in which they might want to

obtain information on the quality of the inspection system. Key considerations were the measures be: informative and actionable statewide; in alignment with the FDA food program standards; and feasible for all FPLS agencies to collect and report. Input showed that the measures reflected important aspects of FPLS in MN but feasibility to report on the measures varied. For that reason, some measures were removed for reporting in 2019. More details about how the measures were reported is available in the Instructions for Reporting FPLS Statewide Performance Measures in 2019:

<https://www.health.state.mn.us/communities/environment/local/docs/ehcib/spmreportinginst.pdf>

The 2018 FPLS statewide performance measures were reported by agency (for staffing information) and by county or, in some cases, city (in the case of cities with a delegation agreement). During this year of data collection, 86 counties and 10 cities reported data. Only one local FPLS agency did not report data.

**Table A. FPLS Statewide Performance Measures**

Required Reporting Elements
<p><b>FPLS Staff Qualifications</b></p> <ul style="list-style-type: none"> <li>▪ % of FPLS inspection staff who are registered sanitarians (REHS) in MN</li> <li>▪ % of FPLS inspection staff qualified to sit for the REHS exam within 2 years of hire</li> <li>▪ % of FPLS inspection staff who are standardized in food inspections</li> </ul> <p><b>Rationale/Benefit:</b> Provides a picture of the FPLS workforce and may drive workforce development planning.</p>
<p><b>On-Time Inspections</b></p> <ul style="list-style-type: none"> <li>▪ % of food inspections completed on time</li> <li>▪ % of lodging inspections completed on time</li> <li>▪ % of pool inspections completed on time</li> <li>▪ % of manufactured home park and recreational campground inspections completed on time</li> <li>▪ % of youth camp inspections completed on time</li> </ul> <p><b>Rationale/Benefit:</b> Provides a better understanding of inspection timeliness that could lead to further analysis and improvement efforts.</p>

## Statewide Results Highlights

The following are key highlights of the 2018 FPLS Statewide Performance Measure data:

- Most Minnesota FPLS inspectors are registered as environmental health sanitarians (85%).
- The percent of Minnesota FPLS inspection staff standardized in food inspections increased in 2018 compared to 2016.
- Most inspections are completed on time, with little change from 2016.
- Key themes related to improving communication, training needed for food staff and the need for increased transparency were highlighted in the statewide discussions.

## Data Limitations and Challenges

Statewide reporting on the 2018 FPLS statewide performance measures was successful. The overall response rate was excellent and the data provide a statewide picture of FPLS in Minnesota. However, the EHCIB recognizes the measures show a snapshot in time, not the steady state of FPLS. Most of the challenges in reporting from 2017 were eliminated in 2019 by removing violations measures.

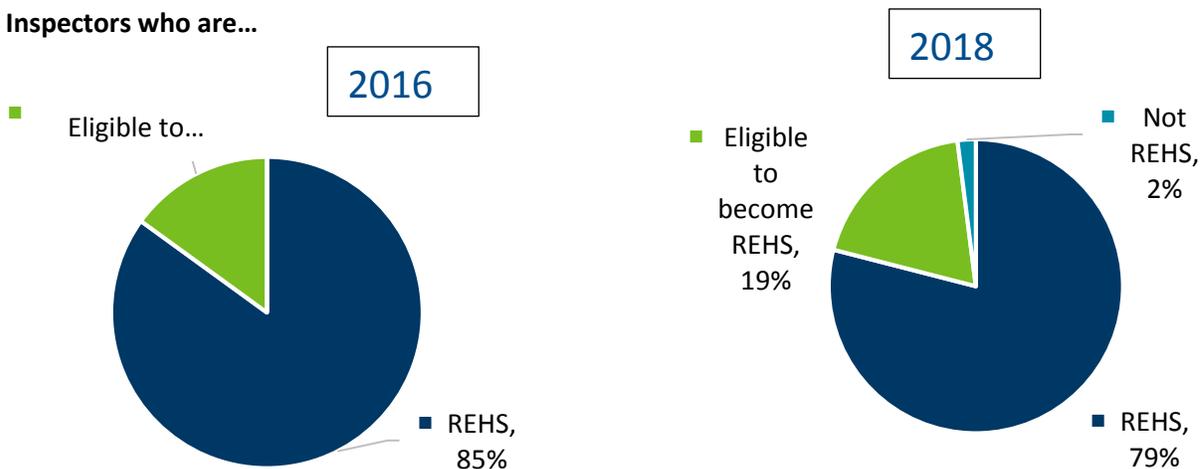
The EHCIB intends to continuously improve the FPLS statewide performance measures and will gather feedback about how to best overcome these data challenges and improve data collection in the future. Overall, agencies stated that reporting was much easier this time as compared to in 2017, when they had optional measures related to cited violations. The remaining data quality issue is 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. Also, only a few number of agencies used the random sample approach in 2019, with the majority submitting their data based on the total number of inspections.

## 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. MDH focused on improving staff qualifications between 2016-2018, in part supported by funding from the FDA [insert grant name and details]. That work may have contributed to the increases noted between 2016 and 2018.

### FLPS Inspectors who are...



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

**Sixty-five percent (65%) of Minnesota FPLS inspectors were standardized in food inspections in 2018, compared to 45% in 2016.**

# On-Time Inspections Data

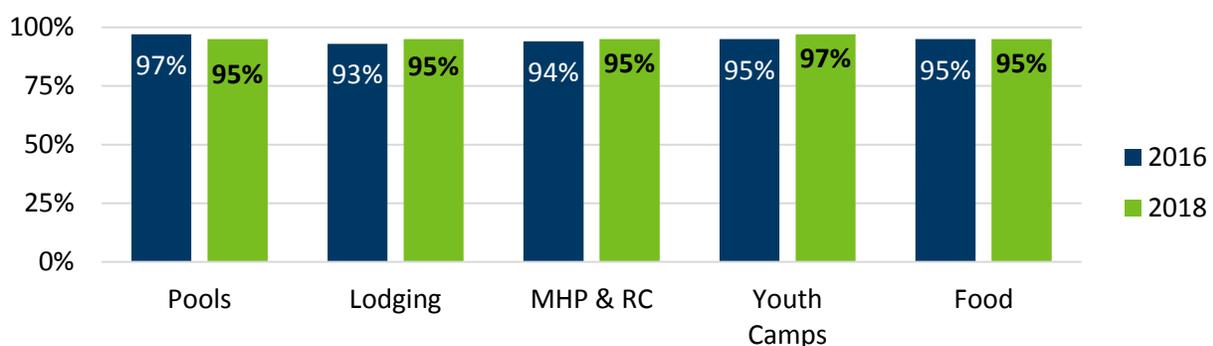
Timely completion of FPLS inspections helps maintain and improve the health of all Minnesotans. Documentation of inspection frequency is recommended in the United States Food and Drug Administration Voluntary National Retail Food Regulatory Program Standards, Standard Number 4- Uniform Inspection Program (PDF): <https://www.fda.gov/media/86785/download>

**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, 2018**



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

# Statewide Discussions

The EHCIB hosted four conversations in February 2019, designed to improve FPLS statewide performance measures and identify key aspects of food safety. Participants included representatives from locally-delegated agencies and non-delegated local health departments, the Minnesota Department of Health and the Minnesota Department of Agriculture. Staff identified key themes around food safety, outlined below.

## Communication

- One-on-one communication between the sanitarian and restaurant staff is critical.
- There is a need to provide ongoing feedback and evaluation to restaurant staff.
- Education on critical risk violations and connections to preventing illness would improve food safety.
- Inspectors need to build relationships and trust with the establishments they inspect.
- Inspectors need to convey to establishments that we want them to succeed and how to do so.

## Food Personnel Training

- Important to have a certified food manager with a breadth of food safety knowledge and best practices.
- Recognition that it is hard to maintain high levels of training and expertise in restaurants with high turnover.
- Strong belief that certified food training has made a difference in quality.
- Need to view staff at establishments as experts in their field, which demonstrates respect.
- Continue to identify education opportunities for establishment staff.

## Call for Increased Transparency

- More transparency needed between inspectors and establishments.
- Need to make a clear connection for establishments between risk violations and foodborne outbreaks
- How can we better connect food safety to the end user, the consumer?

## Questions from Non-Delegated Local Public Health Representatives

- What establishments in the jurisdiction are inspected and by whom?
- How many establishments have confirmed outbreaks?
- Who are the establishments with repeat violations?
- How can local public health help provide information to the public on establishments that do not resolve their issues (repeated violations), which will help consumers understand the justification for doing inspections to decrease illness?
- Conversely, how can local public health highlight establishments that are doing a great job at reducing violations and preventing illness?

# Continuous Improvement Plans

Minnesota continues to move towards having a statewide picture of FPLS and, while peppered with imperfections, overall it was a successful collection of 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 2018 FPLS statewide performance measure results, the EHCIB plans to do the following:

- Explore developing a composite measure to show the value of food establishment inspections. This includes exploring a consumer-friendly measure to help the public understand the value of having safe retail food in MN.
- Create a template “food establishment satisfaction survey,” which could be modified by specific agencies, but includes 3-5 standard questions encouraged for use statewide.
- Monitor inspector staffing qualifications data to ensure we maintain improvements.
- Continue to improve the relationship between MDH and local public health.
- Broaden efforts to improve the state-local relationship by focusing on partnerships between state inspection staff and non-delegated local public health departments. Non-delegated representatives suggested more face-to-face time with inspectors, partnership opportunities on education efforts, and a willingness to promote food safety on their websites under “Hot Topics.”