

STANDARD 1 - REGULATORY FOUNDATION

INSTRUCTIONS AND WORKSHEET FOR CONDUCTING A VERIFICATION AUDIT

Part II – Good Retail Practices

STEP 1 – Review the Self-Assessment conducted for Good Retail Practices

To meet the Standard 1 criteria for GOOD RETAIL PRACTICES, a jurisdiction’s regulations must have a corresponding requirement for 95 percent of the *FDA Food Code* sections listed in *Part II of the Self-Assessment Worksheet*. The AUDITOR must examine the jurisdiction’s *Standard 1: Self-Assessment Worksheet* to verify that an assessment has been made for each of the 246 Good Retail Food Practices *FDA Food Code* sections. The AUDITOR must determine if the jurisdiction identified at least 234 *FDA Food Code* sections (95%) that meet the criteria for stringency of language compared to the *FDA Food Code*.

NOTE: *If a jurisdiction adopted the current published edition or one of the two most recent editions of the FDA Food Code by reference, a side-by-side comparison of the language is not necessary. Adoption by reference meets the criteria of the Standard.*

STEP 2 – Determine Good Retail Practices Sections to Review

The verification AUDITOR must randomly select 13 *FDA Food Code* sections as part of the Part II review process for GOOD RETAIL PRACTICES. A list of random numbers can be obtained from the "Randomizer" web link: www.randomizer.org. Using the jurisdiction's SELF-ASSESSMENT worksheet, the verification AUDITOR must identify the *FDA Food Code* sections that correspond to the randomly selected numbers recorded on the *Part II - Good Retail Practices Verification Audit Worksheet*. The worksheet is included at the end of the instructions.

The AUDITOR should only review those *FDA Food Code* sections that the jurisdiction indicated were met. If a Good Retail Practice *Food Code* section is selected that the jurisdiction did not meet, the verification AUDITOR should select a substitute *FDA Food Code* section to review.

STEP 3 – Confirm Findings for Good Retail Practices

For each of the randomly selected regulatory requirements, the AUDITOR must compare the language in the jurisdiction's code to the corresponding Food Code section to verify it's at least as stringent. Record an "X" in the appropriate box based on the determination.

Yes - Full Intent is Met or

No - Full Intent is not Met

In instances where the verification AUDITOR determined that the jurisdiction’s language does not meet the criterion, they must explain on the *Verification Audit Worksheet*. The AUDITOR must record the explanation under the column “If No, auditor is to specify why the criterion is not met.”

STEP 4 – Document the Verification Audit Results for Part II

To meet the Part II – Good Retail Practices element of Standard 1, the jurisdiction’s regulatory requirements must have a corresponding requirement for 95 percent of the *FDA Food Code* sections listed in Part II of the *Standard 1: Self-Assessment Worksheet*.

If four or more of the 13 selected *FDA Food Code* sections do not meet the stringency of language criteria, the Part II element fails to meet the criteria, and no further sampling is necessary. If one, two or three of the 13 selected food code sections do not meet the stringency of the language criteria, then the AUDITOR must randomly select an additional 13 *FDA Food Code* sections. No more than three total disagreements are acceptable in the 26 *FDA Food Code* sections drawn for comparison in order for the audit to confirm that the Part II element of Standard 1 was met.

Examples of documents that may be reviewed:

- The jurisdiction’s statute, regulation, rule, ordinance, or other prevailing set of regulatory requirements that govern the operation of its food establishments;
- Version of the *FDA Food Code* that was used for the SELF-ASSESSMENT;
- Completed *Standard 1: Self-Assessment Worksheet Part II – Good Retail Practices*; and
- If applicable, documents discussing or comparing code provisions excepted if adoption was made by reference with exceptions.

STANDARD 1 – REGULATORY FOUNDATION VERIFICATION AUDIT WORKSHEET

Part II – Good Retail Practices

Number of Sections Reviewed	Randomly Selected Number	Corresponding <i>FDA Food Code</i> Chapter from Part II Good Retail Practices Self-Assessment Worksheet	Jurisdiction's Corresponding Code Section, Rule, etc.	YES Full Intent is Met	NO Full Intent is Not Met	If no, auditor must specify why criterion is not met
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						

NOTES

1. If there is agreement that ALL 13 selected code sections meet the stringency of the language criteria in the *FDA Food Code*, proceed to Part III.
2. If one, two or three of the 13 selected code sections do not meet the stringency of the language criteria in the *FDA Food Code*, then complete the Supplemental Part II section of the worksheet by randomly selecting another 13 Good Retail Food Practices code sections to review.
3. If four or more of the 13 selected code sections do not meet the stringency of the language criteria in the *FDA Food Code*, then the jurisdiction does not meet the Standard 1 criteria for Part II Good Retail Food Practices.

STANDARD 1 – REGULATORY FOUNDATION VERIFICATION AUDIT WORKSHEET

Supplement to Part II – Good Retail Practices

Number of Sections Reviewed	Randomly Selected Number	Corresponding <i>FDA Food Code</i> Chapter from Part II Good Retail Practices Self-Assessment Worksheet	Jurisdiction's Corresponding Code Section, Rule, etc.	YES Full Intent is Met	NO Full Intent is Not Met	If no, auditor must specify why criterion is not met
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						

NOTES

1. If more than three of the 26 total selected code sections do not meet the stringency of the language criteria in the *FDA Food Code*, then the jurisdiction does not meet the Standard 1 criteria for Good Retail Practices.