

## NRA on Graded Inspections

According to The National Restaurant Association, founded in 1919, the leading business association for the restaurant industry:

- **Letter grading at restaurants is not an indicator of food safety.** In a published study, the Centers for Disease Control and Prevention (CDC) found that when 167,574 restaurant inspections were examined in Tennessee from 1993 through 2000, there was no difference in average letter grades given for restaurants experiencing outbreaks compared to those that were not (Jones TF, Pavlin BI, LaFleur BJ, Ingram LA, Schaffner W. Restaurant inspection scores and foodborne disease. *Emerging Infectious Diseases* 2004 Apr, available from: <http://www.cdc.gov/ncidod/EID/vol10no4/03-0343.htm>)
- **Grade posting punishes restaurants.** Currently, the 2005 Food & Drug Administration Food Code require that if critical violations (i.e. improper food temperatures) are found during a restaurant inspection, the operator is required by law to correct them immediately on-site. The individual inspector must verify it is corrected prior to completion of the inspection. Under the letter grading system, even though the operator has corrected the violation and the risk no longer exists, the “B”, “C” or “F” letter grade would still be have to be posted. Since this letter grade must remain posted until the next routine inspection, in Albuquerque’s case approximately six to nine months, it would be financially harmful especially in a time of economic recession.
- **Letter grading does not identify risk factors for foodborne illness.** In states where letter grading systems are used, none of 12 most commonly cited violations were actual ‘risk factors’ for foodborne illness (see CDC study above). The most commonly cited item was ‘improper storage of toxic items’ such as cleaning bottle stored next to packaged food. The FDA’s inspection form is based on a successful conference between the industry and regulators across the nation. This successful collaboration recognized that food safety is not a competition but rather a public health expectation to be met in cooperation between restaurant operators and regulatory officials.

In these times of nation-wide outbreaks affecting thousands of citizens across the country, consumers are in need of reliable indicators of food safety. If the goal of food safety inspection systems implemented by countless city and state health departments across the country is to prevent foodborne outbreaks, then the letter grading system does not support that goal. As the recent *Salmonella* outbreaks have demonstrated, food safety is a continuous system of risk management over contributing factors that can cause foodborne illness. Restaurant inspections and their reports should mirror this systems approach, not create punitive actions that do not reflect risk of foodborne illness. The National Restaurant Association strongly advises against the use of letter grades and instead supports the continued use and implementation of the current risk-based inspection form.