

Recommendations for Conducting Hybrid and Fully Remote/Virtual Audits for the Produce GAPs Harmonized Standard

Purpose

Although IFPA only manages the technical food safety aspects of the Harmonized, the COVID-19 pandemic triggered discussion amongst the licensees about their approaches to conducting hybrid and virtual audits, and we've summarized their recommendations here. Each licensee is free to develop their own requirements or guidelines as it pertains to how audits are conducted.

What is the difference between remote audits, virtual audits, and hybrid audits?

Fully Remote/ Virtual audit: Virtual audits can be conducted by taking advantage of the multiple emerging communication technologies including live video calling, FaceTime, or Google glass, as well as through email, phone calls, photos, and scanned documents. Regardless of the method or technology used, these virtual options allow auditors to assess the food safety practices of a growing/packing operation without an onsite visit – in other words, **virtual audits** are conducted in a **fully remote** manner.

A fully remote audit will be conducted completely through off-site activities. A document review is conducted using scanned or other electronic versions of an auditee's hard-copy, real-time documentation. This may be followed by interviews conducted with the operation and/or a virtual tour that is conducted using agreed upon technology (e.g. FaceTime or other live video programs, phone interview, etc.) that is feasible for the location of the farm and/or packinghouse. **Fully remote audits are only recommended during emergencies, situations in which travel is restricted, or other circumstances in which social distancing is necessary.**

Hybrid audit: Hybrid audits combine traditional audits with the convenience of remote documentation review. All of the same food safety practices are verified during the onsite visit as compared to a traditional audit, but the total visit time is made shorter by conducting the documentation review remotely before or after the onsite visit. For this reason, hybrid audits can serve as a routine alternative to traditional audits.

Recommendations and Best Practices When Conducting Remote or Hybrid Audits:

1. The review of practices, procedures, and documents in a fully remote or hybrid audits should be equivalent to that of a traditional audit.
2. Remote and hybrid audits should be performed within reasonable time frame. It's recommended that remote records review and virtual interactive meeting or onsite audit be completed ideally within 120 days maximum, or within an otherwise justifiable time frame as agreed on by both the auditor and the auditee.
3. The same auditor(s) should conduct the records/documentation review and the virtual or onsite meeting.
4. The auditor should establish with the auditee what documents should be shared, how, and by when. Digital copy sharing can occur through mail hard copies, email digital copies, cloud storage like Dropbox, OneDrive or Google Doc, online screen sharing through the meeting platforms like zoom, facetime, skype, teams, etc.
 - a. Auditors and auditees should come to an agreement prior to the audit as to whether screenshots or recording are allowable throughout the audit process, and for what purposes the recordings will be used.
 - b. Depending on agreement between the auditor and auditee, any audit material received from auditee, or taken by the auditor, should be discarded, deleted, or sent back to auditee post-audit.

Best Practices applicable only to fully remote, virtual audits:

1. Harmonized licensees should establish parameters based on risk and situational circumstances to determine when to accept or reject fully remote audit requests. Such parameters can include:
 - a. Whether a new client or returning client
 - b. Past performance and audit results of the auditee, if applicable
 - c. Size and type of operation
 - d. Whether the operation was certified via a remote audit during the previous certification cycle (see #2)
 - e. Product group food safety risk profile, including:
 - i. Past history and/or frequency of outbreaks
 - ii. Severity of illnesses
 - iii. Likelihood of widespread or point source contamination
 - iv. Availability of industry or consumer processing interventions (e.g. cooking) to reduce risk
 - f. Feasibility of virtual technologies in the auditee's location
 - g. Country of operation (domestic or international)
2. Harmonized licensees should establish policies as to whether or not an onsite audit is required for certification following fully remote audit, and when.

- a. Operations should not be certified multiple years in a row by means of a fully remote audit with no onsite follow-up. **A hybrid or traditional onsite audit should be conducted the following year after a remote audit for recertification, unless extenuating circumstances prevent this.**
 - b. The follow-up inspection can include those points requiring on-site and/or visual inspection as identified during remote audit, areas where corrective actions were identified, areas already verified during remote audit, or other areas as deemed necessary by the auditor.
3. Virtual interactive components of the remote audit should be completed similar to how an on-site audit is performed to the extent possible. This meeting can include a virtual tour of the operation and associated harvest, packing, and/or storing processes along with conducting interviews with personnel responsible for implementing various food safety procedures.
 - a. Audits can occur through virtual meeting app, system, or method of choice of the Harmonized licensee/auditor. Successful completion of a remote audit may be hindered if there are technical restraints like no camera, webcams or poor internet connection on the farm. Pre-determined and communicated contingency plans can be useful to prevent the need for rescheduling or otherwise interrupting the remote audit due to technology failures or other technical restraints.
 - b. Auditors may ask to cross-check records and information received prior to the virtual audit – audio/screen sharing or sending the documents in real time can be used as verification of hard-copy or electronic records previously received.
4. It is recommended that the term “remote” is written in the certificate, or in the cover page or comment section of the audit report in order to clearly convey to buyers that the operation has undergone a remote audit. Audit reports should include information on what was shown and how (i.e., live video, remote records review, etc.).