

Lodging Inspections Overview
March 13, 2025
Questions and Answers

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Below you will find the summary of the questions and answers (Q & A) from the live Webinar Series. For clarity and brevity, the live session of Q & A was trimmed from the original recording. Please keep in mind that this document is meant as a job aide. It does not create or confer any right for or on any person and does not operate to bind federal, state, or local food safety regulatory agencies. If you have questions concerning interpretation or application of various portions, please reach out to your District Supervisor for assistance. A current District Map is posted at the top of the page where you found the recording and Q & A document.

RATPI – Required Annual Third-Party Inspections

Q. Does the lodging license have to be displayed.

- Yes, this must be displayed in a conspicuous location.

Q. In Section A/B #2, when taking a water sample, would we mark NO until the water sample test results come back?

- Yes.
- Comments from LPHAs:
 - I try to pull a water samples before I come to do the inspection. I have enough of them that I just take a day and hit them all at once in the spring.
 - Website where you can find information on DNR public wells: <https://www.dnr.mo.gov/DWW/JSP/SearchDispatch>

Q. What if a well is classified as a public drinking water source by DNR, do we still mark private because it is a well?

- You would mark those as a public well, however, the establishment should be able to provide you with the monthly testing report done by DNR. Regardless, we must have a well report stating its satisfactory before approval can be given.

Q. On the form you said wells were private but if it is a public well then wouldn't we mark public?

- If it's a public well, it will be marked public. That would be considered one of the third-party inspections you need to look for.
- Someone would already have this test result and/or it should be available from DNR.
- Facility should have access to their results to prove they have clean water.

Q. What about carpet stains that will not come out?

- Depends on the amount of the stain. A small stain would be okay.
- If it's a large stain or in the front of the room, you may want to talk to them about having the carpet replaced or contacting a professional to have it cleaned.

Q. If a facility has a room with a run in the Berber carpet, do we make them replace the whole room?

- No, it wouldn't have to be replaced. Make sure there are no tripping hazards with strings, and they glue the edges down.

Q. Should we mark a violation if sanitary liners are not supplied with ice buckets?

- It's okay if you're certain that the ice bucket is actually being sanitized between customers.
- Ask them how they clean the ice buckets to see if they have been educated on cleaning or ask to see their cleaning process. You can make a judgment call based on that.

Q. Are hot plates allowed in the kitchens to cook for breakfast service (Not available to guests)?

- There are hot plates that are used in the kitchen service, but those are typically unplugged throughout the day.
- Ask follow-up questions. How comfortable do you feel with the facility? In general, I would say no, unless fire department allows this with the local ordinance.
- Case-by-case determination. Ask local fire department; consult BEHS District Supervisor/staff.

Q. If the RATPI systems are tagged green from the 3rd party with accurate date, do we still need to have them produce the reports?

- Yes, you should always be looking at the reports regardless of if they're marked green. The tag/sticker could be from the previous year; there could be a discrepancy in dates.
- Make sure you are doing your due diligence about this.

Q. Smoke detectors are preferably installed on the ceiling; but the smoke detectors can be installed on the walls; correct?

- Yes, they can be installed on the wall

Q. Just to clarify - ALL lodging facilities must have smoke detectors that are hardwired w/battery backup, even if they were built/approved before 2010.

- Yes, that has been in our code since the 1980s. Facilities have had plenty of time to accommodate that requirement.

- The Lodging Code was written in 1985, there was a revision completed in 2001 and that is when the requirement for all lodging establishments to have hard-wired, battery backup smoke detectors and heat sensing devices was implemented.
- There are a few exceptions. For example, a cabin can have a battery back-up; if the facility can prove it's adequately maintained. This would be determined by a discussion with the Lodging Program Manager.

Q. Who is doing third party boiler inspections for the state now?

- Missouri Department of Fire Safety is still doing these inspections.
- They have 7 new inspectors that will be trained and out doing inspections soon.
- Their goal is to have two in each district/area to make sure they can help whenever needed.

Q. E-7. Stairs and ramps, maintained, storage. Please explain "storage".

"good repair" changed to "storage" (E-10); do not understand application of new term.

- If there is a guest room designated as storage, it must be well-maintained and in good order. Make sure it's not cluttered and things like linens are still stored correctly, etc. It can be a fire hazard if there is clutter and/or the facility doesn't maintain their fire alarms and sprinkler systems in these areas. All storage areas should be checked during inspections.

Q. One of my facilities does not use a lot of natural gas, but when the tank is filled, the pressure is checked. However, the tank is not filled every year. They were told they must have a pressure check each year which costs them extra if the tank is not being filled. Can they turn in the paperwork from the time the tank is filled, or do they have to get a new test every inspection year?

- That will require some other follow up questions.
- If you're talking about 2-3 years down the road, they need to have a pressure test more frequently than 3 years. The tanks degrade/depressurize.
 - So, I can require at least every one-and-a-half to two years. Yes, you could require every 1.5 - 2 yrs; if that is when the tank is filled and can be tested. Again, not to exceed 3 years.
- We want to make sure the tanks are safe to be around the facility.

Q. If an establishment is closed for more than 30 days and changes ownership, do they need a new lodging inspection to get the license? and if so, is that local or state?

- No, they must be closed for 18 months before a new initial inspection is required by the state.
- A current, valid lodging license is transferrable if there is a change of ownership.
- Some jurisdictions have local ordinances on this topic.

Q. Did I hear correctly that LPHA don't need joint inspections to be able to conduct inspections by themselves? I thought I read something in the EHOg that shows the online training and joint inspections for new LPHAs.

- I mis-spoke on this as I wasn't clear if it made it into the new EHO or not. Lodging is working to mimic other programs so that inspections can remain consistent with all agencies.

From the 2024 EHO: Just as other programs have conditions for those who can conduct an inspection, the Lodging program does as well. In order to be able to conduct lodging inspections accepted by the program each inspector must complete the two online courses that are offered by the program. Lodging Program Statutes and Rules - Statutes Lodging Program Statutes and Rules-Inspections

Read the State of Missouri Lodging Rule: Governing Lodging Establishments (red book) Once completed, inspectors should contact their EHDS to set up times for joint inspections. Each inspector is required to conduct four (4) inspections with either the Environmental Health District Supervisor or BEHS staff. Two of those inspections should be completed jointly, with the BEHS staff member leading the inspection and two should be completed with inspector in training as the lead.

Once all items are completed, the inspector will be signed off to conduct lodging inspections on their own, provided the BEHS staff member is satisfied that they understand the lodging code and how to apply it.

Q. Can you talk about what is a 3rd party backflow test? Does this only apply to if they have a sprinkler system?

- A 3rd party backflow test is done by a 3rd party company who comes to determine if the backflow device is functioning as it should. It does not only apply for sprinkler systems. During inspections you will see that facilities should have backflow on the incoming water into the building and backflow if there is a sprinkler system. There are other uses of backflow as well, every facility is different. If you are unclear what a backflow device looks like you might go back and look at the presentation that Rachelle did in December 2024 on backflow devices.

Q. If we find a mechanical/laundry room with only a 20 min fire-rated door, we are okay to require them to remove and install a 1-hr. fire-rated door, even if they had been previously approved/passed? Essentially would the lodging program support that decision?

Yes, the program would support the removal of a 20minute fire rated door to replace with 1 hr. The facility can work with their local fire jurisdiction and have them complete the Compliances with Local Ordinances form and if the fire jurisdiction is okay with the door, it can remain. If the facility had not been written up previously for the door, you might allow for an extended period of time for compliance, i.e. have completed by next year's inspection. Q. Is this form available in a pdf fillable format?

- The form is not currently available in pdf fillable format. We are working on possibly getting this for you all to be able to use. The form the State currently is using is in Beta testing so it cannot be handed over to anyone other than State employees.
- We are working on a solution for this, so we can provide all with the pdf fillable version.

For a copy of the inspection "cheat" sheet: <https://health.mo.gov/atoz/ehog/index.php> To request inspection forms from the warehouse: <https://dhssnet.state.mo.us/Warehouse/da-47580-0393.pdf> Please use this link for the warehouse and navigate to the link for Request for Literature and Forms: <https://dhssnet.state.mo.us/admin/general-services.php#tab4>

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