Have you noticed that most of your recent credit card transactions reflect a new, more modern process? COVID-19 concerns (e.g., sharing that gross ballpoint pen to sign receipts) plus long overdue security enhancements combined to institute new routines when paying for that family outing. We tend to now tap (not swipe), avoiding grubby hands, skipping signatures, and forgoing paper receipts. According to a Federal Reserve payment study, there were over 40 billion general purpose credit card transactions in 2018—that is up to 40 billion signature scribbles and tiny paper receipts. We can count that waste reduction among the benefits. I know my wallet feels slimmer without those useless copies, and store owners can celebrate, too. Did you know store owners were compelled to keep merchant copy receipts for 18 months in case somebody disputed a charge?

For the Love of Paper
There are those among us (both regulators and industry) who still embrace the paper. They may give lip service to going paperless but when the time comes, it is difficult to remove paper from the equation despite its costs and limitations.

As a baseline, let’s consider the benefits of digital delivery. For this section, we can imagine a Food Establishment Inspection Report (Figure 1) as described in Annex 7 of the Food and Drug Administration (FDA) model Food Code (U.S. Department of Health and Human Services [HHS], 2017).

When we think about digital delivery, we envision:
1. A report instantly delivered via secure email or text as an attachment or hyperlink (a clicked hyperlink can constitute delivery).
2. A professionally designed report in a secure format (e.g., PDF) that is searchable and easily stored, forwarded, and annotated (could still be printed for those who want it).
3. The removed cost, logistics, and the waste of consumables related to paper, ink, toner, and batteries.
4. How to avoid overloading inspectors with equipment and support for printers.

This list presumes a computerized inspection. For districts still using paper-based inspections, moving to a digital format is obviously a prerequisite.

Challenges: Real and Perceived
Naturally, you may encounter an “it’s always been this way” mentality. This hurdle can be arduous to overcome since inspectors and operators each harbor their own predispositions. Changing minds without a higher authority can be difficult.

Those predispositions might include a perception that the record is only official when it contains the operator's ink-on-paper to be stored on file for many years.

Wet Versus Electronic Signatures
When a person uses a pen to sign their name, acknowledging receipt of an inspection report or any other document, they have endorsed it with a wet ink signature. Statutes have been
enacted in the U.S. and Canada that a) allow e-signatures and electronic records to have the same legal effect as physical (i.e., wet ink) signatures and records and b) ensure that a contract is not made invalid solely because it exists only in an electronic form.

There are some exceptions where a document still warrants a wet signature. Examples include property title instruments, investment securities, wills, powers of attorney, family law matters (e.g., adoption, divorce), and others of this ilk.

**Ordinances That Specify Physical Delivery**

It still occurs, however, that an inspector cites local or state ordinances as the basis for keeping with the physical (paper) delivery.

There is a challenge here. Primarily, it’s not practical to study all of the applicable codes across 2,500 health departments. If this issue is suspected, you’ll have to call upon local resources. Through your health department’s legal counsel (e.g., county counsel), the question can be researched and interpreted. An opinion letter on file should allow for revised procedures. Refreshing the ordinance or embracing the FDA Food Code is another way to go.

**The Food Code**

The FDA Food Code is agnostic on the matter. As stated in Annex 5 of the Food Code:

The inspection form is the official document utilized by a regulatory agency for documentation of compliance of the food establishment with regulatory requirements. The goal of the inspection form is to clearly, concisely, and fairly present the compliance status to the permit holder or person in charge at the conclusion of the inspection. (HHS, 2017, p. 620)

At the conclusion of an inspection event, the ideals above can be met by reviewing a shared screen or by transmitting a provisional report for review prior to the final.

**Conclusion**

The remaining questions and policies surrounding this topic are worthy of a healthy debate. Putting aside the cost savings and other benefits, is the physical hand off of a paper food facility inspection report measurably superior in achieving compliance and protecting the public’s health?

Perhaps soon enough we will have superior technology. Perhaps we will transmit the report to the operator’s smart device where they can wave their hand across the holographic images of facility violations, zooming in and around, à la Minority Report. Until that date, we can avail ourselves of the technology that is out there and that is already well understood by most folks—or at least easily demonstrated.

**Corresponding Author:** Darryl Booth, General Manager, Environmental Health, Accela, 2633 Camino Ramon #500, San Ramon, CA 94583. E-mail: dbooth@acela.com.

**Reference**