



Don't Work Sick

by Melissa Vaccaro, MS, CHO

EMPLOYEE
HEALTH FOR
PERSONS
WORKING
WITH HIGHLY
SUSCEPTIBLE
POPULATIONS

Employee health is a significant control measure in any foodservice facility to prevent foodborne illness. Having a strong and enforced employee health policy will significantly decrease the chances of experiencing a foodborne illness outbreak in your facility. But not everyone wants to or has the luxury of taking off work when they are sick. Many employees hide that they are ill, and will come to work regardless so they get paid and/or not fired. This is unfortunate since the Centers for Disease Control and Prevention (CDC) recently reported that 20 percent of foodborne illness outbreaks involve pathogens that were transmitted to food by food handlers. A recent

study by the Environmental Health Specialist Network (EHS-Net) regarding food workers working when they are sick concluded that 12 percent of restaurant food workers say they had worked when they were sick with vomiting or diarrhea. This was more prevalent in busier facilities.

Practicing good personal hygiene will help prevent the spread of illness from employees to customers, including proper handwashing along with wearing and changing gloves properly. Though a good health policy is essential, good employee hygiene generally will help reduce the chance a customer will get sick in facilities serving the general population. But what if your customer is already



sick or has a medical condition that makes him much more likely to become ill, even with a small amount of contamination?

Every effort must be made to closely monitor the food preparation operations for the highly susceptible population (HSP). Managers and food employees must take the needed safeguards to prevent the spread of communicable foodborne pathogens and viruses to this vulnerable group of people.

A highly susceptible population refers to persons who are more likely than others in the general population to experience

foodborne illness because they are immunocompromised, pre-school age, or older adults. Facilities that serve HSPs provide services such as custodial care, health care, or assisted living, such as a child or adult daycare center, kidney dialysis center, hospital or nursing home, or nutritional or socialization services such as senior centers. A facility is not an HSP facility simply by nature of the medical condition or age of the average customer. The facility must be set up to specifically serve or service HSPs, not the general population.

The FDA Model Food Code provides very rigorous standards regarding HSPs. It addresses the responsibilities of the Person-in-Charge (PIC), the Food Employee and the Conditional Employee. It specifies what illnesses are those of most concern, when a food employee should report these illnesses, and the actions the person-in-charge should take in response to this knowledge. This is a good amount of information to remember and can be a bit confusing for the non-medically minded person. The FDA has provided several decision trees and guidance tables in Annex 3 and 7 of the Food Code to aid facilities in understanding and implementing these requirements.

Due to the nature of an HSP, the FDA separated in the Food Code health information for the General Population from that of the Highly Susceptible Population. Since requirements for the HSP are stricter, be sure you are referencing the correct sections of the code when making decisions about an HSP.

SIX REPORTABLE FOODBORNE ILLNESSES

In the 2013 FDA Food Code, the list of foodborne illnesses of concern grew by one pathogen. Although these are not the only foodborne pathogens, these make the FDA list due to their high infectivity via contamination of a food by infected food employees and/or the severity of the illness.

- 1 Norovirus
- 2 Hepatitis A Virus
- 3 *Shigella* species
- 4 Shiga Toxin-Producing *E. Coli*
- 5 *Salmonella* Typhi
- 6 Non-typhoidal *Salmonella*

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Although anyone can get a foodborne illness, highly susceptible persons are more likely. Why? Because their immune system is challenged for some reason and cannot fight off the invasion of a pathogen like a healthy person can.

Examples of persons who may be highly susceptible:

- Pregnant women
- Young children (pre-school age)
- Older adults
- People with certain medical conditions or undergoing treatment for certain medical conditions such as cancer, diabetes, HIV/AIDS, transplant patients, and similar
- People taking certain medications that may affect the immune system such as cortisone drugs
- People taking certain medications that reduce stomach acids, such as proton pump inhibitor drugs

PERSON-IN-CHARGE (PIC) RESPONSIBILITIES

- Carefully follow protocols for exclusion and restriction, adjusting and reinstating food employees' work status in the establishment. FDA Food Code Annex 3 and 7 provide a great resource for the PIC.
- Ensure that FDA Food Code provisions for what foods and beverages may not be served in an HSP facility are adhered to (3-801). Reinforce these restrictions to employees.
- Ensure that employees are properly trained in food safety as it relates to their duties and use additional safeguards required for working in an HSP.
- Reinforce employee compliance to guarantee good hygienic practices, acknowledge onset of symptoms, meet reporting requirements, and ensure no bare hand contact with ready-to-eat (RTE) food by educating food employees on the importance of following this best practice.
- Ensure that employees have access to facilities that are well maintained, and have the necessary supplies available to follow proper hygienic practices.
- Report any illness to the regulatory authority if a food employee reports a diagnosis with a listed pathogen.

FOOD EMPLOYEE'S RESPONSIBILITIES

- Comply with meeting reporting requirements and informing their PIC if they are experiencing vomiting, diarrhea, jaundice, and/or sore throat with fever.
- Keep hands and arms clean. Any visible lesion should be covered, but report any hand or arm lesions containing pus to the PIC.
- Follow proper handwashing procedures.
- Wash hands as required using designated handwashing sinks only.
- Maintain trimmed fingernails. Edges and surfaces should be smooth and cleanable.
- Do not wear jewelry on hands and arms except for a plain ring, like a wedding band.
- Use single-use gloves for one task. If the gloves are damaged or soiled, or when interruptions occur in the process, they must be discarded.
- Do not touch RTE foods with bare hands, and minimize bare hand contact with exposed food that is not RTE.
- Do not use a utensil more than once to taste food that is to be served or sold.
- Wear clean clothes and hair restraints.
- Do not work with exposed food if experiencing persistent sneezing, coughing, or a runny nose or discharge from eyes, nose, or mouth.
- Eat and drink in designated areas to avoid the contamination of exposed food, food equipment, utensils, linen, and unwrapped single-service and single-use items or items that require protection. Drink from a closed beverage container, and handle the container properly to prevent the contamination of their hands and the container, exposed food, or other articles in the food establishment.

CONDITIONAL EMPLOYEE'S RESPONSIBILITIES

A conditional employee is one who has been offered a job contingent on subsequent responses to questions or medical exams that are designed to find out whether the person has an illness that can be transmitted through food, and the prospective employee. Note: a conditional job offer must be made before making inquiries about the

applicant's health status. The conditional employee must report to the PIC:

- Symptoms such as vomiting, diarrhea, jaundice, or sore throat with fever, a lesion with pus, or an uncovered open wound on hands, wrists, or other body parts;
- A diagnosed illness contracted from Norovirus, Hepatitis A virus, *Shigella* spp., Shiga toxin-producing *E. coli*, *Salmonella* Typhi, non-typhoidal *Salmonella*; or
- A diagnosis of illness from *Salmonella* Typhi within the last three months without completing treatment prescribed by a health practitioner;
- Exposure to, or implicated as, a suspected source by eating or preparing food associated with a confirmed disease outbreak; or
- A history of exposure that includes being in a setting of a confirmed disease outbreak and living in the same household with someone who was in the area of a confirmed outbreak or who was diagnosed with an illness that was caused by a specific illness as previously described in the section.

An employee can begin their job on a restricted basis or after they meet the criteria for removal of exclusion. Under one or more of these circumstances, an individual should not be allowed to become a food employee until the applicable criteria as specified in section 2-201.13 (Removal of Exclusions and Restrictions) of the FDA Model Food Code are met.

EMPLOYEE HEALTH POLICIES

When developing and implementing an employee health policy consider the following:

- Does the establishment have an Employee Health Policy? If so, are the food employees aware of the policy, and is it available in written format and readily accessible for employees? (Note: A *written* Employee Health Policy is not a Food Code requirement.)
- Does the establishment require conditional employees and food employees to report certain illnesses, conditions, symptoms, and exposures?
- Are the reporting requirements explained to all employees?
- What are the reporting requirements for conditional employees, food employees, and the food establishment manager?



Wear single-use gloves for one task. If the gloves are damaged or soiled, or when interruptions occur in the process, they must be discarded.

- Are conditional employees asked if they are experiencing certain symptoms or illnesses upon offer of employment? If so, which symptoms or illnesses?
- If a food employee reports a diagnosis with one of the six listed pathogens in the Food Code, what questions are asked of the employee? (The first question every food manager should ask an employee who reports a diagnosis with a listed pathogen is if the employee is currently having any symptoms.)
- Who does the establishment notify when a food employee reports a diagnosis with one of the listed pathogens?

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- What gastrointestinal symptoms would require exclusion of a food employee from the food establishment?
- What history of exposure is a conditional employee or food employee required to report?
- If a food employee reports a gastrointestinal symptom, what criteria are used to allow the employee to return to work?

All foodservice facilities, but especially an HSP facility, should have a thorough and extensive Food Safety Management Plan that includes HACCP-based prevention, validation of cleaning and sanitizing, training and certification and employee health issues. Comprehensive preventative controls will help to assure that the facility is doing all it can to protect its customers who are highly susceptible. Employers must also encourage employees who are sick

with certain symptoms/illnesses to report them to the PIC and to take off work, even if it means not getting paid.

The simplest advice: Don't work sick. It's not worth the risk. **E**



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