



# Preparing for an Inspection

FOOD PROTECTION CONNECTION



PREPARE YOURSELF, YOUR STAFF, AND YOUR FACILITY  
FOR AN INSPECTION, SURVEY, OR EVALUATION.

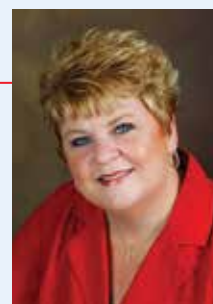
I am often asked: How should I prepare myself, my staff, and my facility for an inspection, survey, or evaluation? The easy answer is to be prepared all of the time. The more complicated and complex answer is to understand and know the Centers for Disease Control and Prevention (CDC) Risk Factors that contribute to foodborne illness and have Active Managerial Control (AMC) over your facility.

What are the CDC Risk Factors? They are statistically known reasons why foodborne illness occurs. They are:

- Food from unsafe sources
- Inadequate cooking

- Improper holding, hot or cold
- Contaminated equipment
- Poor personal hygiene

In 1998 the Food & Drug Administration (FDA) began a study to determine the “in” or “out” of compliance level for nine different foodservice and retail food facility segments with regards to the CDC Risk Factors. This study concluded in 2008, with a final Trend Analysis published in 2010. FDA began another continuation study in 2013, which will conclude in 2023. Preliminary results for the 2013 study should be available from FDA any day now. In the meantime, the study was able to provide valuable



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information to both regulators and industry on the impact of each of the risk factors within various industry segments, and where the facility types were falling short of compliance. The study was and is an attempt by FDA to change behaviors/practices related to foodborne illness, identify food safety practices and employee behavior most in need of attention, provide information about risk factors insufficiently controlled in Institutions, Restaurants and Retail Food, and to remind operators and regulators about safe practices used to control risk factors.

### THREE INDUSTRY SEGMENTS, NINE FACILITY TYPES

#### Institutions

- Hospitals
- Nursing Homes
- Elementary Schools

#### Restaurants

- Fast Food
- Full-Service

#### Retail Food Stores—4 Departments

- Deli
- Meat and Poultry
- Seafood
- Produce

The industry segment of focus is “Institutions,” which encompasses Hospitals, Nursing Homes, and Elementary Schools. These three categories are considered Highly Susceptible Populations (HSPs), which are populations most at risk for foodborne illness due to being immunocompromised in some manner.

Within each of the five CDC Risk Factors there were several data points evaluated. For example, the Improper Holding (Time/Temperature) risk factor had seven data points that were evaluated.

#### RISK FACTOR: IMPROPER HOLDING (TIME/TEMPERATURE)

- TCS\* food cooled properly
- TCS food held cold (41°F or below)
- Commercially processed ready-to-eat (RTE), TCS foods date marked
- TCS food held hot at 140°F or above (Note: 140°F was used in this survey; since then, the Food Code has reduced hot holding to 135°F)
- RTE, TCS date marked after 24 hours
- Ambient temperature

prepared TCS foods cooled properly

- RTE, TCS foods discarded after 7 days (41°F or below) or 4 days (45°F or below)

#### Hospitals and Nursing Homes

The results for Hospitals and Nursing Homes were as follows (based off OUT of Compliance Rates, in order most out of compliance to least)

##### Improper Holding: Time & Temp.

- Cooling
- Cold Holding
- Date Marking

##### Prevention of Equipment Contamination

- Cleaning and Sanitizing of Surfaces and Equipment

##### Personal Hygiene

- Proper and Adequate Handwashing

#### Elementary Schools

The results for Elementary Schools were as follows (based off OUT of Compliance Rates, in order most out of compliance to least)

##### Improper Holding: Time & Temp.

- Date Marking
- Cold Holding

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\* TCS = Time/Temperature Control for Safety food (i.e., PHF or potentially hazardous food)

### Other/Chemical

- Storage, Labeling & Use of Toxic Materials

### Personal Hygiene

- Proper and Adequate Handwashing

How did the Institutions do when compared side by side for controlling Risk Factors? See Table 1.

### FDA RECOMMENDATIONS FOR INSTITUTIONAL FOOD SERVICE

The overall impact of this study resulted in several recommendations from FDA to the Institutional Food Service Industry:

- Review and address the impact areas (data points identified)
- Practice safe procedures—follow Standard Operating Procedures (SOPs)
- Provide staff training
- Monitoring
- Adhere to Food Code requirements of your jurisdiction

How did institutions fare against other segments of the retail food industry? The baseline study additionally focused on Restaurants and Retail Food Service. The 2010 Improvement Goal is the part of the survey that is being conducted by FDA now. Hopefully we will see improvement

when study results are released. I urge you to read the FDA Baseline Study in whole. I promise you will find it very enlightening.

### HOW TO USE THIS DATA

How do you use this data to prepare for an inspection or survey by your regulatory agency or accrediting body? There are two essential items you must address in your facility.

- Have Active Managerial Control (AMC) of Foodborne Illness Risk Factors
- Have a Food Safety Culture

AMC is the purposeful incorporation of specific actions or procedures by industry management to attain control of foodborne

**YOU NEED  
TO WRITE,  
IMPLEMENT, AND  
ENFORCE SOPs.**

For example, have a written SOP for cleaning and sanitizing, handwashing, and thermometer calibration.

Table 1: Percent Out of Compliance Rates of Risk Factors for Institutional Settings

HOSPITALS	NURSING HOMES	ELEMENTARY SCHOOLS
Hot Hold; T/T 40.3% Cooling	Hot Hold; T/T 30.7% Cooling	Hot Hold; T/T 30.8% Date Marking
Prevention of Contamination 18.9%	Prevention of Contamination 20.4%	Chemicals* 21.2%
Personal Hygiene 17.5%	Personal Hygiene 20.2%	Personal Hygiene 16.3%
Chemicals*/Other 13.4%	Chemicals*/Other 18.1%	Prevention from Contamination 13.5%
Improper Cooking 6.3%	Improper Cooking 5%	Improper Sources 4.5%
Improper Sources .5%	Improper Sources 3.2%	Improper Cooking 3%

\* 'Chemicals' is not an official CDC Risk Factor, but was evaluated in this Survey.

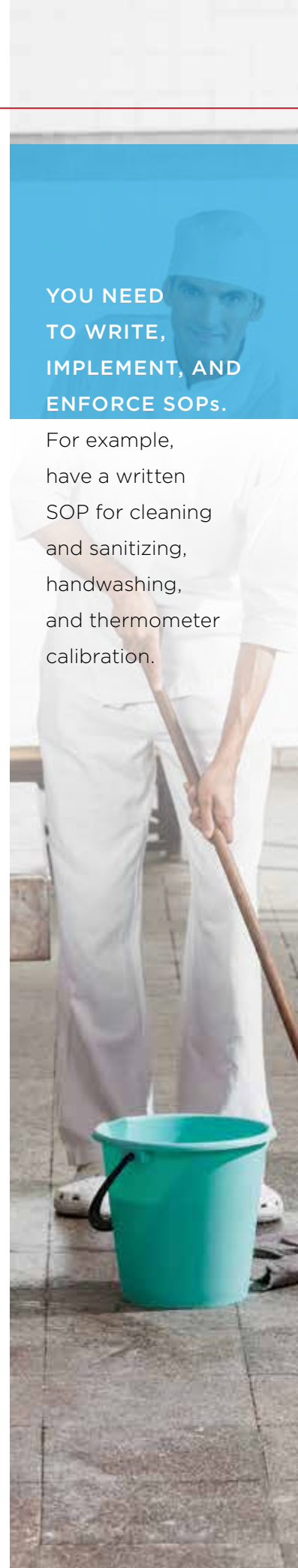




Table 2: Overall Percentage of Observable and Applicable Data Items Found IN Compliance

INDUSTRY SEGMENT	FACILITY TYPE	1998 BASELINE	2008	2010 FDA REPORT
		2000 REPORT	2010 REPORT	IMPROVEMENT GOAL
Institutions	Hospital	80%	81%	85%
	Nursing Home	82%	83%	87%
	Elementary School	80%	84%	85%
Restaurants	Fast Food	74%	78%	81%
	Full Service	60%	64%	70%
Retail Food	Deli	73%	74%	80%
	Meat & Poultry	81%	88%	86%
	Produce	76%	83%	82%
	Seafood	83%	86%	87%



illness risk factors. Have control over your facility!

A Food Safety Culture, according to many experts, is a culture of food safety building on a set of shared assumptions, behaviors, and values that organizations and their employees embrace to produce and provide safe food. It's a belief that food safety, when done right, works to keep people healthy. This is just how we do things in the food safety industry!

How specifically can you address these two essential items? First and foremost, you need to write, implement, and enforce SOPs. For example, have a written SOP for cleaning and sanitizing, handwashing, and thermometer calibration.

There are many SOPs in the foodservice industry—have them written and make sure they are being followed. This should be followed by providing employees with specific training and equipment to implement the SOPs. Document this training!

Employees must also be trained to know their critical limits. These are measurable standards to control risk factors. Again, document the training and provide log sheets for employees to capture their measurements. There should be monitoring procedures in place for all critical processes and practices.

*Continued on page 14*



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Additionally, identify methods to routinely assess your facility (checklists, third party audits, walk-through self-inspections, employee reviews of the facility). Have management verification procedures in place so management staff can verify that things are working the way they are supposed to be working. Again, document thoroughly.

Be ready for an inspection every day!

- Be organized and detailed.
- Set the example. Management, practice what you preach.
- Document, document, document!
- Run your facility as if you will be inspected every day.
- Have a strong food safety culture.
- Have Active Managerial Control. **E**

## REFERENCES

- *Trend Analysis Report on the Occurrence of Foodborne Illness Risk Factors in Selected Institutional Foodservice, Restaurant, and Retail Food Store Facility Types (1998 - 2008)*. <http://www.fda.gov/downloads/Food/FoodSafety/RetailFoodProtection/FoodborneIllnessandRiskFactorReduction/RetailFoodRiskFactorStudies/UCM224152.pdf>
- *Food Code, U.S Public Health Service, Food and Drug Administration*. <https://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/default.htm>

## SAN CE Questions

### FOOD PROTECTION CONNECTION



Reading *Preparing for an Inspection* and successfully completing these questions online has been approved for 1 hour of Sanitation continuing education for CDM, CFPPs. CE credit is available ONLINE ONLY. To earn 1 SAN CE hour, purchase the online CE quiz in the ANFP Marketplace. Visit **[www.ANFPonline.org/market](http://www.ANFPonline.org/market)**, select "**Publication**," then select "**CE article**" at left, then search the title "*Preparing for an Inspection*" and purchase the article.

- What is the purposeful incorporation of specific actions or procedures by industry management to attain control of foodborne illness risk factors?
  - Active management contract
  - Active managerial confirmation
  - Active managerial control
- What is a culture of food safety building on a set of shared assumptions, behaviors, and values that organizations and their employees embrace to produce and provide safe food?
  - Food safety culture
  - Behavioral food safety culture
  - Food safety control
- What was the number one Risk Factor category OUT of control in ALL institutional settings?
  - Improper sources
  - Improper hot holding (T/T)
  - Improper cooking
- The CDC Risk Factors include all the following except:
  - Food from unsafe sources
  - Monitoring
  - Improper cooking
- It is important to have written \_\_\_\_\_ in your facility for your staff to follow.
  - Standardized Operational Procedures
  - Standard Occupational Procedures
  - Standard Operating Procedures
- What must you always do to have Active Managerial Control over the risk factors?
  - Document, document, document
  - Hire more qualified managers
  - Give fewer breaks so employees can rest
- Run your facility as if:
  - There is an active foodborne illness
  - Every day could be an inspection day
  - You will get fired if you do not