



'Tis the Season...

Inspection Season, That Is

FOOD PROTECTION CONNECTION

Inspections 101: Preparation to Aftermath

Early in my career journey, I had a boss who preached the phrase, “Be inspection ready every day.” I was green and didn’t fully comprehend the all-encompassing message behind his catchphrase. Now, after 20 years in food service, I’m the one spouting this same mantra to my teams. Inspections, audits, regulatory visits, or whatever other name they may go by from various regulatory and accrediting agencies, including the Department of Health, the Joint Commission, various third party entities and others, should never be an unexpected surprise. There should not be a mad dash scramble of people running panicked through the kitchen upon their arrival.

Preparation is key to success. However, the most important thing to remember is that *an inspection result is a snapshot in*

time. Unexpected things are going to happen. In fact, expect the unexpected! It may be the only day your lead cook forgets to document a temperature, or the one time that walk-in cooler compressor went down overnight and everything in there is 52°F when the team arrives (with the inspector not far behind), or the time the plumbing went awry and there’s gray water seeping up through the drains in your dish room floor. Bad things can happen to good departments. Even the best of the best operators have experienced a violation or two— or 10— throughout their career progression. We pick ourselves up and dust ourselves off and learn from that inspection and strive to do better in the future.



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Have you ever heard of exam anxiety disorder? This is when someone knows the material, but they get so nervous when it's time to take the test, they fail or do very poorly. I'm convinced that there is an almost identical issue found in foodservice departments around the world that I've dubbed "inspection anxiety syndrome," whereby some of our best employees and managers can forget everything they know and do on a daily basis when the inspector is in front of them observing their work habits and asking them questions.

a question by this stranger strolling through the kitchen and server. Cheat sheets contain key facts that they may be asked during an inspection. These facts can include things like hot and cold holding temperatures, minimum internal cooking temperatures, proper thermometer calibration steps, acceptable thawing methods, sanitizer concentration levels, use-by dates, emergency phone numbers within the facility, evacuation procedures, etc. Even if an employee never pulls it out and looks at it during the inspection, the

No matter what the outcome and no matter how bad the score, lead the debrief with your team by highlighting their best practices and commend them for their efforts and anything positive that was noted—only then should you begin discussing the violations. No one should get into trouble, but it's important to reward for a job well done and thank everyone involved for their efforts and participation. Once you receive the results, prioritize your violations and begin crafting your Corrective Action Plan (CAP)

"Practice makes perfect," and there is a huge benefit to conducting mock inspections prior to the actual auditing visit. These mock inspections should be done by someone not in the foodservice department, and not a closely-related department, like Environmental Services or Laundry, who your employees may know and be comfortable with. This mock inspector should be someone foreign to your employees, so that they can practice being put on the spot to answer questions and complete tasks by people they don't know and don't have familiarity with.



ONCE THE INSPECTION IS OVER, it's important to debrief with your foodservice management team and your employees. Open and transparent feedback on how they did will help them become more comfortable with the inspection process.

Another very valuable tool for your department is the creation of a "cheat sheet." Cheat sheets are aids for your employees who may get stuck or draw a blank when asked

to address the issues noted. A CAP should be made up of S.M.A.R.T. goals, which means it's:

cheat sheet acts as a security blanket for them, just knowing it's available should they need it in a panic. Once the inspection is over, it's important to debrief with your foodservice management team and your employees. Open and transparent feedback on how they did will help them become more comfortable with the inspection process over time.

to address the issues noted. A CAP should be made up of S.M.A.R.T. goals, which means it's:

- Specific**
- Measurable**
- Attainable/Achievable**
- Realistic/Relevant**
- Timely**

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Develop your CAPs *with* your foodservice leadership team. If everyone participates in developing the goals, then they are more likely to motivate the team in meeting and exceeding them as well. Go into your debrief conversation with your department associates with CAPs already established so that you can lead the discussion and your team with a definitive plan to change and improve the issues at hand. If you go in confident and prepared and your foodservice management team is on board, then getting the rest of the team to believe in the vision and follow your ask is much easier.

Another important thing when it comes to inspections is your ability as a leader to understand the “real world” versus the perfection of what an auditor is using as a measure of excellence. You can do very well on an audit, but still have major flaws noted. It’s important to keep in mind that an inspector’s job is to find things wrong in your operation. Also, know where your administration stands in regard to scores, since this can make or break you. If you have an administrator that is judging your performance based on scores alone, then you should probably consider looking for a new job because there are many reasons why a score may fluctuate negatively and it may have nothing to do with your performance or ability as a successful foodservice leader. I am not saying scores are irrelevant, but I am saying scores are irrelevant. Of course none of us wants to see critical violations that are directly related to a process or policy in place, or that pose imminent danger to the safety of our food or our guests; however, it’s important to understand that an empty paper towel dispenser that lost you major points for an improperly stocked handwashing station, could have literally been emptied by the last person who



IF YOU SEE repeated violations... you should pull out your magnifying glass to uncover the root cause and delve into correcting it at its source.

washed their hands there, and then—on their way to the paper goods storage room—they got distracted by another pressing task or a co-worker seeking help, and they just haven’t gotten back to the sink with the new roll of towels. All the while, the auditor is standing there ticking red X’s on their inspection report. You have to ask yourself, is this truly a major issue or not?

If you are a leader who *manages by walking around*, then chances are you have the knowledge and familiarity with your department to know that you’ve never walked up to that handwashing sink in the past and not had it stocked with paper towels and other necessities, then you can make the judgment that this is not a major issue and move on to addressing more important things.

The most critical things to take away from your audit results are the trending issues. The single fluke violations, like the paper towels mentioned earlier, are not concerning to a manager who knows their department. If you see repeated violations, or violations that intrinsically tie into the culture or a deeper seeded safety and/or compliance issue within the organization, then you should pull out your magnifying glass to uncover the root cause and delve into correcting it at its source.

Audits are a very stressful time for foodservice managers who often feel the weight of the department on their shoulders; however, they can also be highly stressful for our employees who are the ones doing the day-to-day tasks and the ones being observed and judged in the process. Keep this in mind and provide personalized attention to your team members before, during, and after the audit process. The most important take-away message I can give anyone in regards to inspection readiness is taken from C.S. Lewis, “Do the right thing, even when no one is looking.” If you have integrity and are doing things the right way every time, then there should be absolutely no worries whether you’re being watched and evaluated, or you’re the only person in the kitchen. **E**

RESOURCES

- A great resource to check out for individual state health inspection agencies is Stop Foodborne Illness, found at: <https://stopfoodborneillness.org/awareness/food-safety-by-state/>
- To learn more about Joint Commission inspections in acute care/hospital settings, visit: <https://www.jointcommission.org/>
- For more about long-term and skilled care facility inspections by the Centers for Medicare and Medicaid Services, visit, <https://www.cms.gov/Regulations-and-Guidance/Regulations-and-Guidance.html>



This Level II article assumes that the reader has a foundation of basic concepts of the topic. The desired outcome is to enhance knowledge and facilitate application of knowledge to practice.

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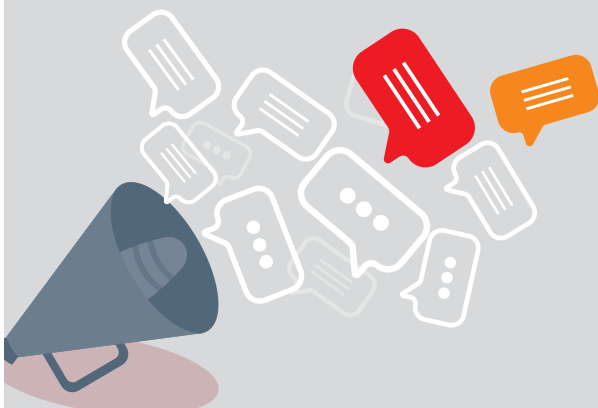
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- Which regulatory agency would not inspect a healthcare foodservice operation?
 - TSA
 - Department of Health
 - The Joint Commission
- Trending issues uncovered during an inspection are less important than single, random violations.
 - True
 - False
- S.M.A.R.T. goals are used to develop Corrective Action Plans after an inspection. What does the M in S.M.A.R.T. stand for?
 - Metrics
 - Measurable
 - Management
- You should always lead your post-inspection debrief with:
 - Top violations noted
 - The audit score
 - Best practices of the team
- Which is not a way to prepare for an inspection?
 - Conduct mock inspections
 - Schedule all managers to arrive at 3 a.m. on inspection day to prepare
 - Provide cheat sheets to associates with key facts
- Integrity means doing the right thing, only when someone is looking.
 - True
 - False
- The auditor is not doing their job if they don't find something wrong during the inspection.
 - True
 - False

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