



by Melissa Vaccaro, MS, CHO

Active Managerial Control

A HACCP Approach



CDMs who answer the FPC Review Questions on page 17 of this issue can check their responses against the answer key found on page 40. This “self check” allows you to confirm your understanding of the test questions.

Are you in control of your foodservice facility? Do you focus your everyday work on how to control risk factors that cause foodborne illness? Do you have Active Managerial Control over your facility?

The Food and Drug Administration (FDA) defines active managerial control (AMC) as the “purposeful incorporation of specific actions or procedures by industry management into the operation of their business to attain control over foodborne illness risk factors. It embodies a preventative, rather than reactive, approach to food safety through a continuous system of monitoring and verification.” It sounds like a lot of work—and it is! It takes dedication, effort, and energy to achieve AMC.

Active managerial control *will* improve your business. How? Skills of your employees will enhance.

- Trained employees will be more efficient, aware, and focused on food.
- A focus on food safety will create a more consistent food product.
- Quality of your food will increase.
- Food costs will be reduced.
- Product loss will be reduced.
- The reputation of your business will increase.
- No negative press due to food quality and food safety issues.
- Revenue will increase.
- **Most important, active managerial control saves lives.**

AMC, as mentioned, is meant to control foodborne illness risk factors. The Centers for Disease Control and Prevention (CDC) has identified five risk factors. These five categories of risk are known to cause 80 percent of the foodborne illnesses in the US.

FIVE CDC RISK FACTORS

- Food From Unsafe Sources
- Poor Personal Hygiene
- Inadequate Cooking
- Improper Holding/Time and Temperature
- Contaminated Equipment/Protection from Contamination

Active managerial control *will* control these risks. But managers and staff must take actions every day that will prevent a foodborne illness. A food facility is only as good as its managers! Without good management a facility will fail or, worse yet, make someone sick. When a health inspector walks into

your facility you should not cringe. If you have AMC over your facility you should be confident you *will* pass an inspection. AMC is proactive, not reactive. It is also being prepared instead of surprised when it comes to inspections or audits. It is you, the foodservice manager, identifying or catching a problem and correcting it without having to be told by an inspector to fix it.

To assure the safety of food, you must create a food safety management system that will include various prerequisite programs that encompass a variety of standard operating procedures (SOPs). SOPs are acceptable practices and procedures. The FDA has identified several elements of an effective food safety management program. They include:

- Having a certified food protection manager
- Developing and implementing SOPs
- Recipe cards that contain specific steps for preparing food items and include critical limits, such as final cooking temperature, that should be monitored and verified
- Purchase specifications
- Equipment and facility design and maintenance
- Monitoring procedures
- Recordkeeping
- Employee health policies for restriction or exclusion of ill employees
- Manager and employee training
- Ongoing quality control and assurance standards
- Specific goal-oriented plans that outline procedures for controlling foodborne illness risk factors

This system is based on the seven principles of HACCP (Hazard Analysis Critical Control Points). It is meant to assure that the food you sell or serve is safe to consume. It is the framework that allows an operator to successfully control the incidence of foodborne illness. A HACCP plan is unique to your foodservice facility and will follow the flow of food in your establishment from purchasing to consumer. HACCP will assure you and your employees understand the food they are serving by having knowledge of the hazards associated with food (biologi-

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cal, chemical, and physical), set critical limits for control of the hazards, create a monitoring system to assure SOPs are working properly and will detail corrective actions that must be taken should critical limits not be met. HACCP will prevent, eliminate, or reduce a hazard to safe levels.

Just to review, the seven principles of HACCP are:

- Hazard Analysis
- Critical Control Points
- Critical Limits
- Monitoring
- Corrective Action
- Verification
- Record Keeping

HACCP is a great food safety management program. This article is not meant to be a HACCP article, it is meant to reinforce why managers must not only set the standard, but understand when and how to use them, enforce them, and set an example for all employees. No HACCP plan, SOP, or prerequisite pro-

gram will work without a dedicated management staff. There are no doubt challenges to obtaining active managerial control; however, no challenge should be an excuse for poor implementation in the day-to-day operation of your food facility. Managers must be involved in these daily activities. Managers must identify and document areas of improvement needed and take action to assure these improvements are implemented.

food safety practices and procedures that are written down. They will have step-by-step policies and procedures specific to your foodservice facility. SOPs may include, but are certainly not limited to:

- a. Training of staff
 - b. Employee health standards
 - c. Allergen management
 - d. Chemical and pest control
 - e. Time and temperature parameters for each food item
 - f. Supplier standards and control
 - g. Product specifications
 - h. Food defense
 - i. Food recall procedures
2. With your SOPs in place, develop a HACCP plan for your food facilities. As a manager if you have never taken a HACCP class, I urge you to do so. HACCP will focus on creating a written food safety program that will control hazards in your facility and thus eliminate or reduce foodborne illness risk.



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If you are not using AMC practices now, how do you get started?

1. Have SOPs. Use them and follow them. SOPs are good

“ ” Managers must identify and document areas of improvement needed and take action to assure these improvements are implemented.

3. Perform daily self-inspections. Use charts and logs to monitor and record your inspection and findings. Both the good and bad should be documented.
4. Take the internal temperature of food. Follow your SOP standards and log all results as required by your SOPs.
5. Monitor hot and cold holding temperatures and record them on logs.
6. Have cooling procedures in place for any food product that will need to be cooled. Test your cooling procedures to make sure they actually work.

7. Establish corrective actions if SOPs are not met. What will you do if the food is not cooked fully? What will you do if proper cooling did not occur? Corrective actions should not only be an immediate correction to a problem. They should be evaluated to determine if a correction to and SOP is needed. Review procedures and train staff accordingly.
8. Schedule basic cleaning, deep cleaning, and maintenance of the facility. Always follow your schedule. If you 'skip' something, it will just build a problem that you may not be able to control easily without a lot of time and energy. It is much easier to clean something that is a little dirty than to skip your routine cleanings and now have to clean something that is extremely dirty.
9. Focus on good hygiene practices, proper handwashing, and proper use of gloves. You must stand back and observe. You will not see these things while you are rushing around or doing some other job. Managers must take the time to stand back and simply watch their food facility at work. People perform better if they know someone is watching.
10. Discuss with employees the importance of reporting illness and symptoms that are reportable to management.
11. Train employees to take personal responsibility for the high standards set by management. Create a food safety culture that employees can take pride in.
12. Most important, lead by example. A manager or owner, when in the food facility, should follow all of the food safety practices that are expected of their employees. If a hairnet is to be worn, then management should wear a hair net. Managers are not above having to follow good hygiene practices, nor are they exempt from following any SOP or Food Code rule.

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Both operators and regulators have a common goal to produce safe, quality food for customers. When an inspection of a food facility is complete, management is left with a list (hopefully not too long) of items to correct. Most regulatory agencies today are performing risk-based inspection. Inspections are focusing less on floors, walls and ceilings, and more on items that could lead to a foodborne illness (risk factors). Most operators make the corrections with the aim of passing their re-inspection. Where many operators fall short is they do not implement proactive systems of control to prevent those violations from reoccurring. Managers must take what they have learned from an inspection and create policies and procedures to ensure those items remain in control without the presence of an inspector. If these policies and procedure are already in place, then managers should investigate why the violation occurred or why the SOPs were not followed, determine if the written SOPs need updating, and make long-term corrective actions to ensure the same violations don't occur again. With a good AMC program in

place, the regulator will serve as more of an auditor of the food safety management system.

Active managerial control requires not only developing a Food Safety Management System, but continued monitoring and verification that the system is working. It is industry's responsibility to develop and implement these programs to prevent, eliminate, or reduce foodborne illness. It takes a good management system and active managerial control to make it all happen. Knowing your facility is providing not only good tasting food, but safe food should energize you. Having AMC will improve your business in many ways. It will ultimately ensure you are serving not only quality food, but safe food. ☺

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Active Managerial Control—Self Assessment

Adapted from Boulder County Public Health, Environmental Health Division: Active Managerial Control Self-Assessment

Answer the following questions. Unless otherwise noted, a “Yes” equals 10 points. A maximum of 10 points is possible for each question, for a total of 100 points. What is your grade?

- | | |
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| <p>1. Y N Are managers certified food safety managers? (e.g. ServSafe, NEHA certificate, NRFSP certificate) [10 pts]</p> <p>2. Y N Do all employees who handle food receive formal food safety training? (e.g. STAR class, food safety video, computer classes) [10 pts]</p> <p>3. Y N Does the facility conduct and document daily food safety inspections? [10 pts]</p> <p>4. Y N Does the facility have private/corporate self-inspections? [10 pts]</p> <p>5. Y N Does the facility document handwashing or glove use? [10 pts]</p> <p>6. Y N Does the facility document sanitizer concentration and usage? [10 pts]</p> <p>7. Y N Does the facility have a written employee illness policy? [5 pts]</p> <p>8. Y N Are employees given paid sick leave? [5 pts]</p> | <p>9. Y N What types of thermometers are available in the facility? (5 points maximum) [5 pts]
 <input type="radio"/> Thermocouple <input type="radio"/> Digital <input type="radio"/> Dial</p> <p>10. Y N Does the facility have a thin probe thermometer available? [5 pts]</p> <p>11. Y N Does the facility frequently document food temperatures? (e.g. receiving, initial cook, hot and cold holding, cooling, and reheat temps) [5 pts]</p> <p>12. Y N Does the facility document thermometer calibration? [5 pts]</p> <p>13. Y N Does the facility have preventative maintenance contracts for [10 pts for all 3; 5 pts for 1-2]
 <input type="radio"/> Pest control
 <input type="radio"/> Dish machine maintenance
 <input type="radio"/> Refrigeration maintenance</p> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
- YOUR TOTAL SCORE = _____**