Long-Term Control of Food Safety

by Melissa Vaccaro, MS, CHO
Have you ever had a violation show up on your routine annual inspections, and the same violation seems to keep being noted year after year? If this has happened to you, it’s time to think about a Risk Control Plan.

A Risk Control Plan is a long-term intervention strategy to control a chronic problem in a food facility. You don’t want to allow repeat violations to continue showing up on your inspection reports. In many states now, inspection reports can be publicly accessed. How good will it look to your potential customers if the same stuff keeps being written up every year? Does it show you just don’t care? It is also feasible that a regulatory jurisdiction could begin an enforcement action against a facility for continued failure to correct repeated violations. In either case, it’s simply not a good idea to just ignore violations found in your facility.

**WHAT IS A RISK CONTROL PLAN (RCP)?**

1. Written agreement
2. Developed by the operator with input from the regulator
3. Describes a management system for the control of a specific risk factor

A risk control plan could be written on a napkin, hopefully it won’t be, but most importantly it shows that there’s a commitment for change and that the operator participates in developing the plan. If the operator does not participate, then what’s left is simply a compliance schedule from a regulator and a chronic problem that will likely keep occurring. Uncontrolled chronic risk factors will eventually lead to someone becoming ill. With an RCP, we are striving for Active Managerial Control by achieving long-term compliance with an out of control risk factor or behavior.

What are risk factors? They are five practices/behaviors that the CDC (Centers for Disease Control and Prevention) has statistically identified as being the most prevalent contributing factors to foodborne illness or injury in the United States.

**RISK FACTORS**

- Poor personal hygiene
- Food from unsafe sources
- Inadequate cooking
- Improper holding temperatures
- Contaminated equipment

Remember the whole goal with food safety is to prevent someone from getting ill. Controlling hazards is the key. You might recall that hazards come in various forms which include: Biological (bacteria, virus, parasites), Physical (hair, bandages, glass), and Chemical (additive, sanitizers). The FDA (Food and Drug Administration) has identified several Food Code interventions to control the 5 Risk Factors. These intervention strategies should be considered when developing an RCP.

**RISK FACTOR INTERVENTION**

Intervention strategies are broad categories of food safety techniques that can be used to manage out of control risk factors. In a HACCP approach these intervention strategies would come in the form of various control measures, from cooking adequately, to having a strong employee health policy, to utilizing proper thawing methods. The 5 interventions are:

- Demonstration of knowledge
- Hands as a vehicle of contamination
- Employee health
- Time/temperature relationships
- Consumer advisory

**DEVELOPING A RISK CONTROL PLAN**

For the most part, the normal inspection and inspection report writing process is sufficient to eliminate Food Code violations. Violations are noted and then corrected. However, some uncontrolled hazards may become continuous or chronic. The
Risk Control Plan process requires management to analyze the problem and propose a solution. Management is required to implement the plan over a given period of time while keeping records to verify the plan is working. Repeating the desired behavior over a given time period creates good long-lasting habits.

Typically, Risk Control Plans address uncontrolled hazards that are procedural or behavioral in nature. Virtually any type of procedure needing managerial control ranging from facility/equipment cleaning and maintenance, equipment monitoring, time/temperature compliance, food handling, employee hygiene, etc. can benefit from a Risk Control Plan. One-time actions to fix a problem such as the installation of a vacuum breaker on a hose bib or the installation of a ventilation hood over a piece of cooking equipment are generally addressed by other means.

The regulator can and should offer suggestions or options for corrective action or alternative procedures, but the final decision for what approach will be attempted needs to come from the operator. The operator knows their establishment and employees much better than the regulator. They may have a more realistic approach. Even if their approach proves to be unsuccessful, at least the attempted Risk Control Plan can be used to document that the regulator made an effort to work with the operator. “Look, Bob, I really tried to work with you and do this your way…but I think you can see that it’s not working. Let’s try another approach.” From a legal standpoint, this also documents that the operator knew that it was a problem and agreed to a specific corrective approach and they either did or didn’t manage to pull it off.

A Risk Control Plan must analyze and address:
- The hazard to be controlled
- How the hazard will be controlled
- Who is responsible for control
- What are the critical limits
- What monitoring, corrective actions, and record keeping are required

### RISK CONTROL PLAN EXAMPLE

**Establishment Name:** Hamburger Heaven  
**Type of Facility:** Fast Food (risk category 3)  
**Physical Address:** 1234 Anywhere Street  
**Person in Charge:** Sam Jones  
**City:** Nice  
**State:** HI  
**Zip:** 11111  
**County:** Franklin

**Inspection Time In:** 8:00 am  
**Agency:** State Health Dept.

**Specific observation noted during inspection:**
Hamburger cooked to 130°F on grill.

**Applicable code violation(s):**  
3-401.11(A)(2)

**Risk factor to be controlled:**
Cooking

**Hazard (most common):**  
Salmonella: E. coli 0157:H7

**What must be achieved to gain compliance in the future:**
Continue to cook until internal temperature of 68°C (155°F) is met. Use a thin probe thermometer to check the final cooking temperature. Establish cooking procedures for ground beef.

**How will active managerial control be achieved:**
(Who is responsible for the control, what monitoring and record keeping is required, who is responsible for monitoring and completing records, what corrective actions should be taken when deviations are noted, how long is the plan to continue)

Temperature checks of hamburger patties will be taken using appropriate temperature measuring devices on the first batch of hamburgers cooked by assigned staff, i.e. chef, manager, line cook. Sam Jones will record the temperature on his production chart.

Hamburgers with a temperature below 68°C (155°F) will be returned to the grill for further cooking to internal temperature of 68°C (155°F). Final temperature will be noted on the production chart.

**How will the results of implementing the RCP be communicated back to the inspector:**
Temperature records will be faxed to Jane Smith at xxx-xxx-xxxx each Friday for 4 weeks.

As the person in charge of the Hamburger Heaven located at 1234 Anywhere Street, I have voluntarily developed this risk control plan, in consultation with Jane Smith and understand the provisions of this plan.

Sam Jones  
(Establishment Manager)  
[Signature]  
2/6/2009  

Jane Smith  
(Regulatory Official)  
[Signature]  
2/6/2009

(Source: U.S. Public Health Service, FDA Procedures for Standardization of Retail Food Safety Inspection Officers, 2010, Annex 3.2)
The benefits of an RCP might include:

- The plan, developed by the operator, allows the operator to consider all of the options and decide what is best for his/her establishment
- Input from the regulator helps to create a team approach to problem solving
- Creates long-term behavioral changes
- Restores managerial control over procedures that have the chance for causing foodborne illness

The next time you are sitting across the table having a review discussion with your Sanitarian and you have just gotten ‘written up’—yet again—for having a certain risk factor violation, look at your Sanitarian and say: “Hey, can we work together to create a Risk Control Plan so this violation does not keep being written up?” How impressive will that be?! 😊

• The corrective action that will be taken should the critical limit not be met
• The agreed timeframe for correction
• How the results will be communicated to the regulator

There is no specific ‘form’ that must be used to write an RCP. You may just choose to write a narrative and explain your RCP in that manner, as long as all components of the RCP are addressed. FDA (Annex 3.1 in the Procedures for Standardization of Retail Food Safety Inspection Officers, 2010) has provided sample Risk Control Plan forms for anyone to use. You might also want to check with your regulatory agency to see if they have an RCP form that they use.

**Benefits of an RCP**

RCPs don’t have to be big long documents. They can be short and simple. Even the shortest of RCPs can provide benefits.

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