



FoodBytes

Indiana State Department of Health

Sending HACCP back to school

The large school system food service consisted of one main preparation facility and five satellite operations. The schools provided breakfast and lunch to more than 1500 customers per meal.

But all was not well. The schools wanted to minimize waste, so some food was returned to the main kitchen from the satellite serving sites for later use.

Sharp-eyed inspectors at the local health department noticed

several potential problems. Most had to do with poor procedures and a lack of control at the critical points.

The problem

Inspectors conducted several Hazard Analysis Critical Control Point (HACCP) inspections to get a clearer picture of the food processes. Here is what they found.

Sausage gravy used for breakfast was prepared at the central kitchen. The only criteria for being cooked was that it seemed "hot." A cooking tem-



perature was not taken.

The gravy was then transported to the satellite serving locations along with that day's lunches. Temperatures were not

(Continued on page 5)

Vol. 4, No. 4

Winter, 2004

Inside this issue:

Proper narrative writing vital 2

Food Program hires new staff 2

Food security project: farm to fork 3

Certification creates challenge 3

FDA training earns kudos 4

Second food symposium planned 5

Bits, bytes, and blurbs 6

Commissaries common concern

Many larger supermarkets offer deli items that include varieties of salads and other dishes. A prudent inspector will ask the question, "Where are these made?" Never

assume they are made on site.

Several major grocery store chains use a central facility to manufacture deli and salad items like sand-

wich spreads and tuna salads because this enables them to assure consistency and safety.

Inspectors should ask who inspects the commissaries.

Proper narrative writing a vital part of inspections

The formal inspection is over. The inspector has taken his notes and recorded his temperature measurements, and is now ready to write and present the inspection report to the person in charge.

With more and more inspections being published by news media, these final steps cannot be taken lightly.

Remember first of all that the inspection form is a legal document provided for by Indiana law. This fact is going to dictate some limitations on the language that should be used.

The narrative portion of the inspection report is meant to document the observations and measurements taken during the inspection that are deemed by the inspector to be in violation of various sections of 410 IAC 7-20.

Remember also that inspections provide learning opportunities for establishment operators. An accurately written inspection narrative can provide guidance in the proper ways to correct violations.

Let's look at an example.

After speaking with the manager, the inspector learned that the deep stock pot full of cooked rice inside the walk-in was prepared at 9:00 AM. The product temperature was 98° F. at 1:30 PM.

This could be a violation of both sections 171 and 172 because the food measured above 70° F. in 2 hours, *and* the food was not being cooled in shallow pans or one of the other methods outlined in Sec. 172.

The violation might be written: "Sec. 171. Cooked rice being cooled in the #2 walk-in cooler measured 98° F. after four hours elapsed time."

And the second part written: "Sec. 172. A large stock pot was being used to cool cooked rice."

But what if the same situation/violation was worded in the narrative this way?

"Improper methods used to cool potentially hazardous foods such as cooked rice."

Would this be a documented violation of Section 171? Probably not, because the food code's pa-



Inspectors should cite what they see, not what they don't.

rameters of time and temperature are not included.

Would this be a violation of Sec. 172? Again, probably not, because there is no indication of what was improper about the method used to cool the food.

The way this is worded, no violations of the food code were docu-

mented.

It's important to write exactly what the inspector sees and measures, not what he *didn't* see. Say exactly what was observed, where it was observed, and who did it.

Will the reader of the report get a clear image of the violation? The operator won't make corrections he if doesn't understand what was wrong.

*Dave Drinan, Tippecanoe Co. Health Dept.
Ed Norris, ISDH*

Food Program hires new staff

The Food Protection Program field positions are again fully staffed with three new hires.

The Wholesale Food Specialist for Northeast Indiana held for many years by Don Courtney has been filled by Julie Puterbaugh.

Kris Thomas has accepted the Retail Food Specialist position for Northeast Indiana vacated by Brad Beard, while Lisa Harrison is now in the West Central Indiana position previously held by Travis Goodman.

Other retail field staff

include Ed Norris, 1; Dan Miller, 3; Michelle Glunt, 4; Ed Zglenicki, 6; and Paula Proctor, 7. Marion County is shared by Dan Miller and Michelle Glunt.



Certification to create unique challenge in 2004

So, who needs to be “certified?”

This is just one of the many questions local health department inspectors are wanting to know.

The law that covers certification in Indiana is different from laws that cover inspections of retail food establishments. The result is that there are establishments exempt from inspections (not-for-profits, for example) that are not exempt from the certification requirement because the laws are dif-

ferent.

The law spells out exemptions specifically, so if it’s not listed as exempt, compliance is required. Among operators not exempted are temporary vendors.

“It’s important to realize that the new rule only requires that one person employed by each covered food establishment pass one of three approved exams,” said Scott Gilliam, Food Program Manager. “A training class is not required.”

Gilliam also urges that inspectors not be “heavy handed” when



Specific information on certification will be covered at the Food Protection Symposium in March.

the effective date arrives, but encourages compliance by providing guidance on training and examinations offered.

Food security project: assess safety farm to fork

The post 9/11 world has made citizens aware of the potential threat posed by terrorists to our nation’s food supply. To focus on minimizing the risk of an attack, and to be prepared to respond, two new Food Security Specialist positions have been created at the Indiana State Department of Health (ISDH).

These food security specialists will assess the vulnerability of food production and storage facilities to security risks, and devise methods of improvement. They will aid industry, government, and academia to prepare together so as to secure Indiana’s food supply.

In 1999, ISDH entered into a *Public Health Preparedness and Response to Bioterrorism Cooperative Agreement* and received funding from the Centers for Disease Control and Prevention (CDC). According to the CDC

Industry, government, and academia must prepare together to secure Indiana’s food supply.

grant, ISDH is to “ensure the performance of risk and vulnerability assessments at Indiana food production, processing and/or distribution facilities.”

The Indiana food security project will start with an industry survey to assess the current food security situation in Indiana, which is currently unknown. When completed, the results will be analyzed to find where there are vulnerabilities in the food industry in Indiana. Based on these results, a plan will be developed to address the vulnerabilities and to devise a strategy over time to remedy them.

The plan, being developed by the Indiana Food Security and

Bioterrorism Preparedness Task Force, includes members of industry, government, and academia. By involving all the stakeholders, the task force can help guide the food security specialists in carrying out their obligations under the CDC grant. This plan will be implemented and carried out over time and will also stimulate an on-going discussion between government and industry.

Once information about food facilities’ production, processing, and distribution is completed and the results submitted to CDC, ISDH will request additional funding to assess both the agricultural and retail portions of Indiana’s food chain. The project goal will be to assure security of the entire Indiana food chain “from farm to fork.”

Travis Goodman, Food Security Specialist

FDA training program earns kudos from locals

“It was the best training I’ve ever been to.”

That was the comment of one attendee at the end of the recent, “Managing Retail Food Safety,” the three-day training course put on by the State Training Branch of FDA. The course utilized five of FDA’s top presenters to show how the “process approach” can be applied to conducting food inspections.

The 60-plus attendees not only received an thorough HACCP (Hazard Analysis Critical Control Point) refresher, but also learned how to classify all foods prepared in a retail food establishment into one of three food process categories: “complex,” “cook-serve,” and “no-cook.”

As the instruction cadre explained, all foods can fit into one of these categories. That will then lead the inspectors to ask the necessary questions to assure that the food establishment operator has control of each of these steps, especially the steps identified as

“critical.”

The objective is to achieve control of each of the food process steps to reduce the possibility of a foodborne illness.

The class divided into six groups several times to do exercises in HACCP principles and foodborne pathogens. One exercise involved “role playing,” taking the viewpoint of the operator as well as the inspector.

The workshop represented the latest thinking in inspection techniques and the ability level that should be the goal of every inspector. The workshop was a perfect fit with the Standardization Program now being offered to local health department inspectors.



Allen Gelfius (top) explains a “hazard analysis” exercise to the group, while Shirley Bohm (left) talks to attendees about current food safety concerns in the food industry.

John Marcello (below) stresses the importance of “active managerial control” and how inspectors use this knowledge to gain voluntary compliance. Cpt. Larry Edwards and Cdr. John Powell also shared the instructional duties.



List of Indiana Standardized inspectors growing

More inspectors have been added to the list of Certified Retail Food Establishment Inspection / Training Officers.

Recently Standardized are Dave Gries, Vanderburgh Co. Health Dept.; Holly Hoover, Pulaski Co. Health Dept.; Kim Stallings, Spencer Co. Health Dept.; Mary Wesemann, Dearborn

Co. Health Dept.; and Sheila Paul, Tippecanoe Co. Health Dept.

To become Standardized, candidates must meet the qualifications as outlined in the procedures manual.



These requirements include being actively engaged in inspections of retail food establishments, having a working knowledge of the application of HACCP principles, and having worked with a member of the ISDH field staff on joint training inspections.

Second “Food Protection Symposium” to be offered

Because of the overwhelming positive response to the first “Food Protection Workshop” offered in 2002, the ISDH Food Protection Program is again putting the final touches on the second edition.

As there was “standing room only” during the first conference, local health department food inspectors should plan to reserve a spot as soon as the official mailing with all the details arrives.

Seating for the symposium, slated for March 9 to 11, 2004, will

be limited to the first 200 people who sign up.

Scott Gilliam, Food Program Director, said, “There will be a lot of information on the new laws concerning civil penalties, and food handler certification.”

Tentative plans call for speakers from the Indiana Restaurant and Hospitality Association, Exterior Assessments,

and The National Registry of Food Safety Professionals. These represent the three approved certification exams.

A demonstration of the new FIRMS database for managing food program permits and inspections is also planned.



The first ISDH Food Workshop received high praise from attendees in 2002

Sending HACCP back to school (continued)

(Continued from page 1)

checked before or after delivery.

Much of the gravy was placed in home-type refrigerators in large containers, ignored the rest of the day and overnight. There was no monitoring of the cool-down process. Inspectors discovered the gravy still in the danger zone long after cool down should have been accomplished. Gravy was reheated the next morning before serving. Still there were no temperature checks and nothing logged.

Also found: Lunch foods like ham and potatoes were returned to the central kitchen and then added to a future food product, “if it looked good.”

There was also no direct communication between employees at the main kitchen and the satellite serving sites. There was no evidence of control over any foods at any step. The food service director

There was no real communications between the sites, and no evidence of control at any point.

did not offer any direct oversight.

Fixing the problem

To get a handle on the problem, inspectors first had to construct a food flow chart of the entire food process. This was accomplished with several inspections of the main kitchen and the five satellite site. They determined that none of the critical control points were controlled: cooking, holding, cooling, or reheating.

Armed with this information, inspectors formed a written HACCP-based plan along with the Food Service Director (FSD). It included the following steps:

1. Food temperatures would be monitored, not just during cooking,

but at each step during food transport. These temperatures would be recorded for review by the FSD and the local health department.

2. A Risk Control Plan specifying correction actions shall be devised to instruct food employees what to do when food temperatures are incorrect.

3. Foods not served that are held to the next day shall be cooled according to the food code guidelines concerning methods and time.

4. Any food returned to the main kitchen from any satellite location shall not be re-used if there is no documentation of temperature control at each preceding step of the food flow.

5. The FSD shall engage in “Active Managerial Control” to assure that proper control is maintained at each step of the food flow, since more than one food employee is involved.



How to contact us:
FoodBytes
Indiana State Department of Health
Consumer Protection - 5C
2 N. Meridian St.
Indianapolis, IN 46204

Telephone: 317-233-7360

e-mail: food@isdh.state.in.us

We're on the web!

[www.in.gov/isdh/
regsvcs/foodprot](http://www.in.gov/isdh/regsvcs/foodprot)

Official newsletter of the Indiana State Department of Health Food Protection Program, intended to provide training support for local health departments.

FoodBytes is published quarterly by the Food Protection program, Indiana State Department of Health.

Greg Wilson, MD
State Health Commissioner

Liz Carroll, JD
Deputy State Health Commissioner

Editorial Staff

Ed Norris, MS, CFSP
FoodBytes Editor

Scott Gilliam, MBA, CFSP
Food Program Manager

Bits, Bytes, and Blurbs

Send your questions to the e-mail or postal address above.

- ◆ *As FoodBytes is about to enter its fifth year, it was decided to develop a new format. We hope you like it.*
- ◆ *Heather Vaughan has been chosen as the new Consumer Specialist. She replaces Tara Renner, who accepted a job in the private sector. Heather will be the primary contact on issues related to consumer complaints and food samples.*
- ◆ *A bi-metal stem thermometer must have its entire sensing section immersed in a food to be measured. It then gives the average temperature found along the sensor. It is possible for "cold spots" to be missed.*
- ◆ *Test strips intended to measure sanitizer solution strengths only give an approximate indicator of chemical strengths. Inspectors should be cautious in writing violations based upon these strips unless the resultant color change is very obvious.*
- ◆ *The type and strength of lights in a kitchen can affect the way color looks in cooked hamburger, says USDA.*
- ◆ *The latest version of the new FIRMS (Food Inspection Regulation Management System) database is in the final stages of testing. Once design and testing are completed, it will be available to all local health departments.*

Calendar

Food Protection Symposium

March 9, 10, 11, 2004

The symposium will offer the latest information about food handler certification and the civil penalties rule.