FREQUENT KITCHEN CITATIONS AND COMPLIANCE SOLUTIONS

BLAKE WALTERS, MS, REHS
COLIN ENDRES-BERCHER, BA
LAURA LAUINGER, RDN, CFPP

LARA
LICENSING AND REGULATORY AFFAIRS
PROTECT PEOPLE & PROMOTE BUSINESS

1

INTRODUCTION

- Blake Walters, MS, REHS
  - Environmental Sanitarian, BCHS
- Colin Endres-Bercher, BA
  - Environmental Sanitarian, BCHS
- Laura Lauinger, RDN, CFPP
  - Senior Director of Food & Nutrition, Mission Point Healthcare

2

GOALS OF THE PRESENTATION

- Evaluate existing procedures for areas of improvement in food service.
- Describe risks within the kitchen environment.
- Recognize common regulation violations in kitchen operations.
- Identify potential issues with policies and procedures related to food service operations.

3

GUIDELINES & REGULATIONS

The State Operations Manual

F812

- The facility must –
- §483.60(i)(1) - Procure food from sources approved or considered satisfactory by federal, state or local authorities.
- §483.60(i)(2) - Store, prepare, distribute and serve food in accordance with professional standards for food service safety.

The 2013 FDA Food Code

Intent

- 1-102.10 Food Safety, Illness Prevention, and Honest Presentation.

The purpose of this code is to safeguard public health and to provide to consumers food that is safe, unadulterated, and honestly presented.

[1] [2]

4

A RISK BASED APPROACH

Most likely to cause foodborne illness?

- Employee illness
- Hand hygiene
- Food handling
- Temperature control – the "Danger Zone"
- Discarding of out of date
- Improper Sanitizing

5

RISK BASED CONTROLS

- PRIORITY ITEM (P) - contributes directly to the elimination, prevention or reduction to an acceptable level, hazards associated with foodborne illness or injury and there is no other provision that more directly controls the hazard.
- PRIORITY FOUNDATION ITEM (Pf) - a provision in this Code whose application supports, facilitates or enables one or more priority items.
- CORE ITEM - usually relates to general sanitation, operational controls, sanitation standard operating procedures (SSOPs), facilities or structures, equipment design, or general maintenance.

[2]

6

MOST COMMON ISSUES

- Cleaning of Food Contact Surfaces - P
- Date Marking and Discarding – PF / P
- Proper and Adequate Sanitizer – P, PF, C
- Cooling Potentially Hazardous Foods - P
- Air gaps - P
- Proper Handwashing - P

7

CLEANING FOOD CONTACT SURFACES

8

FOOD CONTACT (FC) SURFACES

"Food-contact surface" means:

"(1) A surface of EQUIPMENT or a UTENSIL with which FOOD normally comes into contact; or

(2) A surface of EQUIPMENT or a UTENSIL from which FOOD may drain, drip, or splash: (a) Into a FOOD, or

(b) Onto a surface normally in contact with FOOD."

[2]

9

CLEANING FC SURFACES

Objective

4-601.11 Equipment, Food-Contact Surfaces, Nonfood-Contact Surfaces, and Utensils.

"(A) EQUIPMENT FOOD-CONTACT SURFACES and UTENSILS shall be clean to sight and touch. [Pf]

(B) The FOOD-CONTACT SURFACES of cooking EQUIPMENT and pans shall be kept free of encrusted grease deposits and other soil accumulations.

C) NonFOOD-CONTACT SURFACES of EQUIPMENT shall be kept free of an accumulation of dust, dirt, FOOD residue, and other debris."

[2]

10

CLEANING FC SURFACES

Frequency

4-602.11 Equipment Food-Contact Surfaces and Utensils.

"(A) EQUIPMENT FOOD-CONTACT SURFACES and UTENSILS shall be cleaned:

(1) Except as specified in ¶ (B) of this section, before each use with a different type of raw animal FOOD such as beef, FISH, lamb, pork, or POULTRY; P

(2) Each time there is a change from working with raw FOODS to working with READY-TO-EAT FOODS; P

(3) Between uses with raw fruits and vegetables and with TIME/TEMPERATURE CONTROL FOR SAFETY FOOD; P

(4) Before using or storing a FOOD TEMPERATURE MEASURING DEVICE; P and

(5) At any time during the operation when contamination may have occurred. P" [2]

11

CLEANING FOOD CONTACT SURFACES VIDEO CLIP

12

CLEAN IN PLACE EQUIPMENT

- Equipment not feasible to wash, rinse, and sanitize via dish machine or three compartment sink.
  - Stand Up Mixers
  - Slicers
  - Ice Machines
  - Refrigeration Units

13

CLEAN IN PLACE VIDEO CLIP

14

FOUND IN THE FIELD

15

COMPLIANCE SOLUTIONS – FOOD CONTACT CLEANING

- Be your own surveyor
- Routine Sanitary Audits
- Verify with flashlight
- Incentivize based on good work.
- Have employees own certain tasks
- Educate!

16

DATE MARKING

17

DATE MARKING

3-501.17

- Refrigerated, RTE, PHF (TCS) held for more than 24 hours shall be clearly marked to indicate the date or day by which the food shall be consumed on the premises, sold, or discarded when held at a temperature of 41°F or less for a maximum of 7 days.
- The date food is prepared is Day 1; add 6 for a total of 7 days.

[2]

18

DATE MARKING

- For commercially processed refrigerated, RTE, PHF (TCS): same process as foods prepared from scratch in the facility:
- The day the original container is opened is Day 1, and may not held for longer than 7 days.
- There are different ways to date mark, but they must remain consistent throughout the kitchen.

19

DATE MARKING – BEST BY AND USE BY

- The day or date marked by the FOOD ESTABLISHMENT may not exceed a manufacturer's use-by date if the manufacturer determined the use-by date based on FOOD safety.
- "For Best Quality"

20

Remember! Personal and Resident refrigerators count too!
-Is the refrigerator 41 degrees F or below?
-Is the freezer properly keeping foods cold?
-Are the foods dated and labeled?

21

COMPLIANCE SOLUTIONS – DATE MARKING

- Keep simplified policies.
- Daily rounds to check for dates.
- Have dietary staff in charge of maintaining resident food / refrigeration units. (Perhaps PM cooks does rounds each day).
- Set up a calendar in the kitchen for reference.
- Educate

22

COOLING POTENTIALLY HAZARDOUS FOODS

23

COOLING

3-501.14

- Within 2 hours cool from 135˚F to 70˚F
- Within 4 hours cool from 70˚F to 41˚F
- Must not exceed 6 hours of total cooling

- Cooling logs?
  - What is the verification process to ensure proper cooling?

[2]

24

COOLING METHODS

3-501.15

- Shallow pans
- Ice wands
- Ice baths
- Small amounts
- Frequent Stirring

25

COMPLIANCE SOLUTIONS - COOLING

- Log Cooling procedure – 6 Hours
- Start cooling at 135F, check product temperature after 1 to 1.5 hours.
- Use cooling methods to quickly cool through danger zone.
- Don't underestimate stirring!
- Always leave vented / uncovered during cooling.
- Make employee own the process.
- Educate!

26

COOLING LOG

Rapid Cooling Monitoring Chart

Month: January

	Food / Date	Start 140F to 135°F Time	Start 140F to 135°F Temp	1 hour to 1 ½ hours Time	1 hour to 1 ½ hours Temp	2 hours 70°F Time	2 hours 70°F Temp	4 Hours Time	4 Hours Temp	6 hours 41°F Time	6 hours 41°F Temp
1/13	Taco Meat	1:00	137	2:15	105	3:00	78	5:00	50	7:00	40
1/13	Veg Soup	12:00	140	1:30	90	2:00	67	4:00	41		
1/15	Turkey	8:00	185			10:00	70			2:00	41
1/23	Sausage Gravy	4:00	142	5:00	105	6:00	72				
1/24	Roast Beef	1:00	137	2:00	101	3:00	65	5:00	45	7:00	38

Problems & Corrective Action Taken: _____

Cool foods from 135°F to 70°F in 2 hours, and then from 70°F to 41°F in 4 hours, for a total cooling time of 6 hours maximum. Use an accurate foodservice thermometer and measure the internal temperature of the food.

27

COMPLIANCE SOLUTIONS – COOLING (CONT.)

- If the cooling process is approaching the first 2-hour mark, and the food product is not going to reach 70 ° F, reheat the product to 165 degrees and restart the cooling process.

28

HAND WASHING

29

HAND WASHING - HOW

2-301.12 – Cleaning Procedure

(A)...FOOD EMPLOYEES shall clean their hands and exposed portions of their arms, including surrogate prosthetic devices for hands or arms for at least 20 seconds, using a cleaning compound in a HANDW ASHING SINK...

(1) Rinse under clean, running warm water; P

(2) Apply an amount of cleaning compound recommended by the cleaning compound manufacturer; P

(3) Rub together vigorously for at least 10 to 15 seconds while: (a) Paying particular attention to removing soil from underneath the fingernails during the cleaning procedure, P and 46 (b) Creating friction on the surfaces of the hands and arms or surrogate prosthetic devices for hands and arms, finger tips, and areas between the fingers; P

(4) Thoroughly rinse under clean, running warm water; P and

(5) Immediately follow the cleaning procedure with thorough drying using a method as specified under § 6-301.12

[2]

30

HAND WASHING - WHEN

2-301.14 When to Wash.

- FOOD EMPLOYEES shall clean their hands and exposed portions of their arms as specified under § 2-301.12 immediately before engaging in FOOD preparation including working with exposed FOOD, clean EQUIPMENT and UTENSILS, and unwrapped SINGLESERVICE and SINGLE-USE ARTICLESP and:
- (A) After touching bare human body parts other than clean hands and clean, exposed portions of arms; P
- (B) After using the toilet room; P
- (C) After caring for or handling SERVICE ANIMALS or aquatic animals as specified in ¶ 2-403.11(B);
- (D) Except as specified in ¶ 2-401.11(B), after coughing, sneezing, using a handkerchief or disposable tissue, using tobacco, eating, or drinking; P
- (E) After handling soiled EQUIPMENT or UTENSILS; P
- (F) During FOOD preparation, as often as necessary to remove soil and contamination and to prevent cross contamination when changing tasks; P
- (G) When switching between working with raw FOOD and working with READY-TO-EAT FOOD; P
- (H) Before donning gloves to initiate a task that involves working with FOOD; P and
- (I) After engaging in other activities that contaminate the hands. P

[2]

31

HAND WASHING - WHERE

2-301.15 Where to Wash.

FOOD EMPLOYEES shall clean their hands in a HANDW ASHING SINK or APPROVED automatic handwashing facility and may not clean their hands in a sink used for FOOD preparation or WAREWASHING, or in a service sink or a curbed cleaning facility used for the disposal of mop water and similar liquid waste

- Are sinks accessible and convenient?
- Soap and paper towel available?
- Hand washing for a total of 20 seconds, minimum.

[2]

32

HAND WASHING VIDEO CLIP

33

COMPLIANCE SOLUTIONS – HAND WASHING

- A clock at hand sink.
- Have a staff song to hum or sing.
- Keep hand sinks free and clear for use.
- Have enough sinks to be convenient.
- Taking time to ensure safety
- Glove use
- Educate!

34

SANITIZING

35

SANITIZING

7-204.11 Sanitizers, Criteria.

- Chemical SANITIZERS, including chemical sanitizing solutions generated on-site, and other chemical antimicrobials applied to FOOD-CONTACT SURFACEs shall:
- (A) Meet the requirements specified in 40 CFR 180.940 Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations (Food-contact surface sanitizing solutions)[P], or
- (B) Meet the requirements as specified in 40 CFR 180.2020 Pesticide Chemicals Not Requiring a Tolerance or Exemption from Tolerance-Non-food determinations.

[2]

36

SANITIZING - WAREWASING

- 4-501.114 Manual and Mechanical Warewashing Equipment, Chemical Sanitization Temperature, pH, Concentration, and Hardness. "A chemical SANITIZER used in a SANITIZING solution for a manual or mechanical operation at contact times specified under ¶4-703.11(C) shall meet the criteria specified under §7-204.11 Sanitizers, Criteria, shall be used in accordance with the EPA-registered label use instructions…"

[2]

37

APPROVED SANITIZERS

- Quaternary Ammonium (Quat) – Most widely used for general kitchen sanitizing. – Requires 200-400 parts per million
- Sodium Hypochlorite (Bleach) – can be used for general sanitizing, most often used in LTC for chemical dish machines. – Requires 50-100 parts per million
- Iodine – Rarely ever used anymore – Requires a pH of 5.0 or less
- Hot Water – Most dish machines in LTC are High Temperature – Requires a contact of temperature of 160F

38

HOW TO TEST

- Follow, Directions, Exactly.
- Use clock for timing
- Check temperature before testing.
- Follow Specific manufactures instructions

39

FOLLOW MANUFACTUERES INSTRUCTION'S

40

CHEMICAL SANITIZER TESTING VIDEO CLIP

41

COMPLIANCE SOLUTIONS - SANITIZER

- Quat Absorption – Cotton Cloths - Don't place wiping cloth in bucket until it needs to be used.
- Dispense Sanitizer at room temperature.
- Always get from the same source.
- Properly test and have test strips available in all kitchen areas.
- Educate

42

DISH MACHINE

43

DISH MACHINE

- 2013 FDA Food Code Requirements:
- 4-603.14 Wet Cleaning. "(A) EQUIPMENT FOOD-CONTACT SURFACES and UTENSILS shall be effectively washed to remove or completely loosen soils by using the manual or mechanical means necessary…"
- 4-603.16 Rinsing Procedures. "Washed UTENSILS and EQUIPMENT shall be rinsed so that abrasives are removed and cleaning chemicals are removed…"
- 4-703.11 Hot Water and Chemical. "After being cleaned, EQUIPMENT FOOD-CONTACT SURFACES and UTENSILS shall be SANITIZED…"

[2]

44

DISH MACHINE HOT WATER SANITIZING

- 4-501.112 Mechanical Warewashing Equipment, Hot Water Sanitization Temperatures.
- The temperature of the fresh hot water sanitizing rinse for mechanical dish machines, as it enters the manifold may not be more than 90oC (194oF), or less than:
  - (1) For a stationary rack, single temperature machine, 74oC (165oF); or
  - (2) For all other machines, 82oC (180oF). Pf

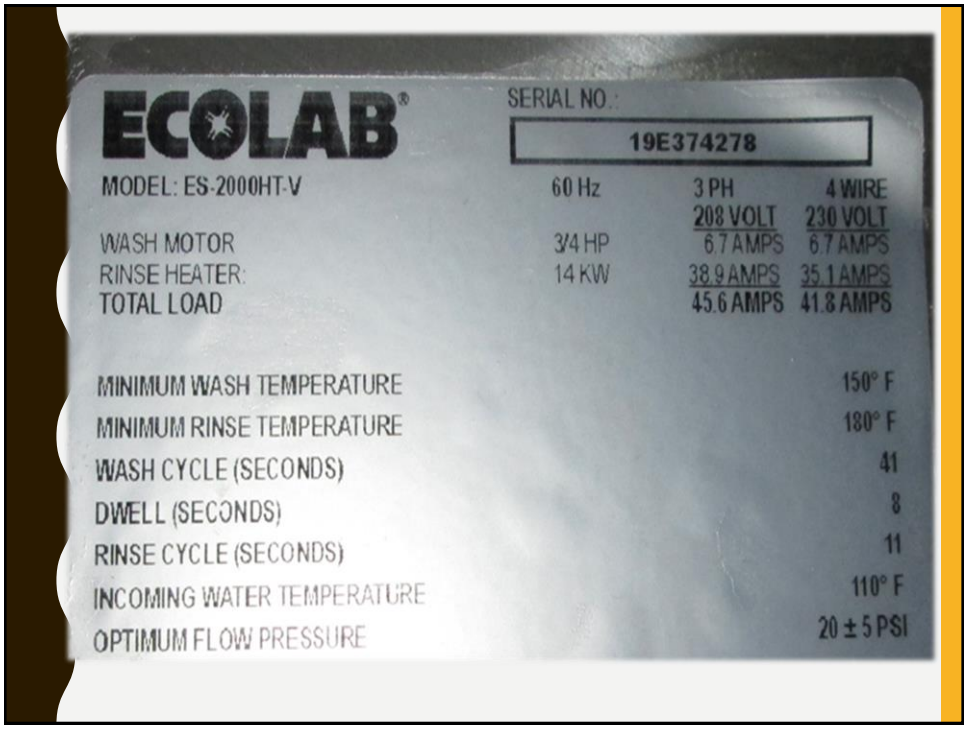
[2]

45

DISHWASHING AND SANITIZING (4-703.11)

- Do they check the dishmachine?
- What do they use?
- Is a log kept?

46



47

DISH WASHING VIDEO CLIP

48

DISH MACHINE LOG

49

COMPLIANCE SOLUTIONS - DISH MACHINE

- Use a log to ensure machine is working properly.
- Do not record low/high temperatures unless an issue is identified. Then show corrective action.
- Use test strips or high temperature thermometer for assurance.
- Run the machine a few times before starting dishes and testing.
- Be cognizant of gauges and dials on machine and know what they mean.
- Educate

50

AIR GAPS

51

AIR GAPS

2013 FDA Food Code Section 5-202.13 Backflow Prevention, Air Gap.

- An air gap between the water supply inlet and the flood level rim of the PLUMBING FIXTURE, EQUIPMENT, or nonFOOD EQUIPMENT shall be at least twice the diameter of the water supply inlet and may not be less than 25 mm (1 inch).

5-402.11 Backflow Prevention.

- (A) Except as specified in ¶¶ (B), (C), and (D) of this section, a direct connection may not exist between the SEWAGE system and a drain originating from EQUIPMENT in which FOOD, portable EQUIPMENT, or UTENSILS are placed.

[2]

52

AIR GAPS – SIDE BY SIDE

POTABLE AIR GAP

NON-POTABLE AIR GAP

53

AIR GAP INSPECTION VIDEO CLIP

54

COMPLIANCE SOLUTIONS – AIR GAP

POTABLE AIR GAPS

- Reposition / Repair spring at overhead spray.
- Install Gooseneck Faucet.

NON – POTABLE AIR GAPS

- Change the use of the sink.
- Cut discharge drain at 45 degree angle to prevent splash.
- Make the Air Gap easily visible.
- Have monthly preventative maintenance to ensure Air Gaps are still present and in good working order.

55

A SURVEY EXPERIENCE

56

INTERACTIONS DURING SURVEY

SURVEYOR INTERACTION

MURPHY'S LAW

FACILITY STORY

CORRECTIVE ACTION

RESIDENT FOCUSED OUTCOME

57

COVID-19 IN FOOD SERVICE

58

COVID-19 IN FOOD SERVICE

- Food Flow
- Disposable or non-disposable
- PPE
- Food contact surface sanitizing vs non-food contact surfaces sanitizing
- Food Code approved sanitizers
  - Double wash
- Prepare for breach, corrective action
- Coordination between Departments

59

RESOURCES

60

EMERGENCY ACTION PLAN

Michigan Department of Agriculture and Rural Development: Emergency Action Plans for Retail Food Establishments.

- Electrical Service Interrupted
- Water Service Interrupted or Contaminated Water Supply (Biological)
- Sewage Back-up
- Fire
- Flood
- Vomit and Stool Cleanup

Can be found at: www.michigan.gov/mdard in the Food and Dairy tab

[4]

61

REFERENCES

[1] State Operations Manual, Appendix PP – Guidance to Surveyors for Long Term Care Facilities, (Rev. 11-22-17)

[2] 2013 FDA Food Code, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Public Health Service • Food and Drug Administration College Park, MD 20740

[3] Keystone Multi-Quat Sanitizer Poster, 2013 Ecolab USA Inc.

[4] Michigan Department of Agriculture and Rural Development - Emergency Action Plans for Retail Food Establishments, 2017

62

THANK YOU

- Noah Hunt and David Salinas, Culinary Arts students at the Allegan County Area Technical Education Center.
- Mary Hoadley, Teacher of Culinary Arts at the Allegan County Area Technical Education Center.
- All the Healthcare workers for persevering through this challenging and stressful time.

63