



Active Management in Foodservice Food Safety

1 THE US FDA MODEL FOOD CODE AND BEYOND

In 2010, the FDA released a retail program update that identified four action areas: (1) encourage widespread, uniform, and complete adoption of the FDA Food Code, (2) make the presence of certified food protection managers common practice, (3) strengthen active managerial control at retail and ensure better compliance, and (4) create an enhanced local regulatory environment for retail food operations.

The first goal relates to having clear and effective governance. Using the most up-to-date US FDA model Food Code is highly recommended. The concern for chain operators is that different jurisdictions may be using different versions of the code. This can result in having numerous iterations of a master food safety system. Item four could be used to encourage local regulatory to put in place processes that permit chain operators to operate under one version of the food code. It is recognized that this idea is not an easy task. Whichever version of the Food Code is used, it is not a food safety system in of itself. There is more.

2 BASIC ACTIVE MANAGERIAL CONTROL

Active managerial control as defined by the US FDA is establishing *preventative* controls for hazards or risk factors that might lead to foodborne illness. This is the first step in achieving a proactive food safety management system compared to the reactive system of inspection alone. Active Managerial Control places the importance of food safety and interventions on managers of facilities and de-emphasizes the strict role of the regulator or inspector.

2.1 EDUCATION AND TRAINING

2.1.1 Certified food protection manager

A certified food protection manager or food safety manager is someone who has passed an accredited exam or program in retail-foodservice food safety. The standard has been created by the Conference for Food Protection. ANSI (American National Standards Institute) accredits the exam and providers. There are four accredited exam providers as of 2014. Note that only the exam is accredited and not a course or training program. There are many courses that provide the necessary training and education to pass an accredited exam.

A standardized exam contains questions that measure competence on the foundational items contained in the US FDA model Food Code. A food safety manager should not be looking forward into active managerial control until they are highly competent in the basics found in the Food Code.



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2.1.2 Employee and staff training

Many jurisdictions require or offer a food workers training course. This is often 90-120 minutes and covers the absolute minimum in safe handling of foods. However, this should never be the end of training for employees and staff. Active Managerial Control requires that food operators plan and execute education and training activities in their daily or weekly routines. At the very minimum, all processes should be taught hands-on to the extent that employees can demonstrate their own proficiency. Then, each week active managers should direct or provide some additional training directed at the highest risk food safety processes.

2.2 STANDARD OPERATING PROCEDURES (SOPs)

A standard operating procedure is a written document that specifies what, why, who, how, and how often an operational procedure should be performed. SOPs should also list materials and steps for both managers and staff in accomplishing the task(s). Finally, SOPs should indicate recordkeeping requirements, verification requirements and if there are any corrective actions for failure to meet specifications. Comprehensive SOPs may also list references to validations of the outlined process.

2.3 HACCP-BASED RECIPES

While HACCP itself is considered an advanced active managerial control tool, it can be applied at a much simpler level. This involves simply placing the appropriate HACCP-based critical limits or controls inside recipes or formulation sheets. Once critical limits are provided, instructions should detail how to monitor, record, and verify them. Deviations are reported to supervisors for determination of corrective actions or corrective actions can be built-in.

2.4 PURCHASING FOODS

One of the five CDC-FDA risk factors leading to foodborne illness in retail and foodservice operations is safe source of food. Purchase specifications are meant to address this risk factor. The obvious rule is to purchase only approved and inspected foods and packaging. However, this item needs more control over who has approval to purchase foods and the process they must go through. Specific attention must be given to farmers market or direct food purchases. The other aspect of this section is recall traceability. A system should be developed to monitor recalls from suppliers and to have the capability to rapidly locate and remove those food items from stock.

2.5 EQUIPMENT & FACILITY – DESIGN, SANITATION, AND MAINTENANCE

An operator's facility and equipment are vital components in a food safety system. It is assumed that a facility has gone through the process of plan review and approval. That process should ensure there are sufficient sanitation facilities such as hand sinks and ware washing sinks. Once a facility is in operation this category represents sanitation. Proper design and maintenance are generally to enable proper sanitation. Replace facility items and equipment that are not easily cleaned and sanitized. Remove impediments to access or relocate equipment that needs better access for cleaning and sanitizing and.



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2.6 MONITORING AND RECORD KEEPING

Monitoring and recordkeeping is simple evidence that someone actually measured a critical limit such as temperature. Naturally monitoring is only effective if done properly using calibrated measurement tools and records are only accurate if kept truthfully. Under the Active Managerial Control plan, operators should be designing measurement SOPs together with recording forms for things like cooking and reheating temperatures, cooling temperatures, and hot or cold holding temperatures. Like all food safety programs, verification is needed to ensure calibrated tools and accuracy in recordkeeping.

2.7 EMPLOYEE HEALTH AND HYGIENE

2.7.1 Employee health

A number of foodborne illnesses have been traced back to an ill employee. These include employees with gastrointestinal illnesses and with viral illnesses such as Hepatitis A. The Food Code specifies a preventative policy for restricting or excluding ill employees. Restriction is reserved for lesser risk illnesses requiring an ill employee to work away from foods. Exclusion is reserved for higher risk illnesses that have a great potential to lead to outbreaks. In this case employees may not work in a food facility at all. The topic can be complex to the extent that the FDA has created a 64 page guidance manual.

<http://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/IndustryandRegulatoryAssistanceandTrainingResources/UCM194575.pdf>

2.7.2 Employee Hygiene

Employee hygiene is another of the five CDC-FDA risk factors that can lead to foodborne illness in retail and food service operations. Hand washing.

3 ADVANCING ACTIVE MANAGERIAL CONTROL

The US FDA model food code provides the principles of food safety interventions in active managerial control. However, the Food Code does not take into account risk or special risks. Risk control plans are proactive policies and SOPs that address specific risks that are common to a food facility. This might include allergen management, time as public health control, use of curing compounds, sushi rice acidification, no bare hand contact with foods, and many others. Food safety professionals might recognize these as prerequisite programs (PRPs).

In 2005-6 the FDA expanded their proactive food safety outreach to include HACCP (Hazards analysis and critical control points) control plans. HACCP extends the nature of active managerial control into the specific food processes an operator might have. HACCP is a food safety system that identifies, evaluates and control food safety hazards. The most important hazard is biological (illness causing microorganisms). Chemical and physical hazards are also of concern. The main goal of a HACCP system is to ensure that hazards are prevented, eliminated or reduced to an acceptable level.