

Avoid the

Health Inspector SHOWDOWN

BY ARIANNE CORBETT, RD

Ask just about any local health inspector, and he or she likely will tell you that school kitchens are the cleanest foodservice facilities in town. There's no specific research that supports this claim, but it's a common anecdote that school nutrition directors and managers from all across the country hear repeatedly and share with pride year after year. Despite such praise, inspection days are still some of the most stressful days of the year.

School meal operations are required to comply with a long list of federal, state and local regulations for everything from meal components to procurement to sanitation procedures—collectively far more than any other foodservice segment. The scope of detail is mind-boggling.

So, it's no wonder that no matter how confident you are in your knowledge of the food safety plan, the arrival of the local health inspector can really get the heart pounding. Does everyone have on a hairnet or cap? Are all temperatures in the appropriate range and being recorded properly? Does every piece of equipment shine? Are items stored appropriately? These are just a few of the questions that likely race through your head—especially if you are a director, supervisor, manager or assistant manager.

While the answers to these questions are most likely all in the affirmative, what happens if they're *not*? Are you worried you will start hearing the iconic theme music from "The Good, the Bad and the Ugly," as

**Change your perspective about
food safety inspections from
anxiety and antagonism to
partnership and
possibilities.**





GOAL FOOD SAFETY



SNAPSHOT

- A local health inspector can be an expert source to help improve your food safety practices and protocols.
- Follow along during the inspection and don't be afraid to ask questions.
- Remember, you and the health inspector share the same goal: serving safe meals to children.

you and the inspector stare each other down on opposite sides of a three-compartment kitchen sink? Relax. There is no reason to look at a health inspection as an antagonistic exercise.

A better perspective starts with recognizing an important reality: There is *always* room for improvement. The food safety inspection can be a fantastic opportunity to get an expert assessment and advice on reducing food safety risks and improving the plan you already have in place. The process is intended to be for your benefit—and the benefit of all the children you serve.

The Rules

As most *School Nutrition* readers know, schools that participate in the federal school meal programs are required to maintain proper sanitation and health standards in compliance with all applicable state and local laws and regulations. The 2004 Reauthorization Act required all school food authorities to implement a separate school food safety program that is based on HACCP (Hazard Analysis and Critical Control Point) principles at each preparation/serving site. The 2004 legislation also mandated a minimum of two health/safety inspections annually for each kitchen participating in the federal programs. (Some states, however, require even more inspections.) Schools must post health inspection reports in a public place and provide copies upon request.

In SY 2011-12, nearly 8 of every 10 schools met or exceeded the two-inspection requirement, according to



PARTNERSHIP

federal statistics. State agencies cite insufficient funds and staff resources for handling the increased inspection load as the primary reasons for non-compliance with the regulatory requirement.

Prime Partnership Potential

As school nutrition professionals, you work diligently to serve safe meals and ensure your kitchen, serving and dining areas sparkle. A safety inspection is an opportunity to reinforce that daily effort and validate the effectiveness of your food safety program. Remember that a state or local health department is your partner in providing safe meals for children. A spokesperson at the U.S. Department of Agriculture's Food and Nutrition Service (USDA/FNS) affirms the inherent value of site inspections, noting that health inspectors (also referred to as environmental health professionals) and school nutrition professionals share a common goal: keeping the food that kids eat safe! "School nutrition professionals shouldn't feel intimidated during a food safety inspection. Instead, turn the inspection into a learning opportunity! The local health department can be a tremendous food safety resource."

The first step to making the most of this opportunity, continues the USDA rep, is to establish a partnership with someone, perhaps the food safety program supervisor, at the local health department. You don't have to wait until inspections are scheduled to take advantage of this resource. When food safety issues or

questions arise, you can contact your health department partner directly, and immediately, to work on a resolution.

Dr. Kevin Sauer, assistant professor at The Center of Excellence for Food Safety Research in Child Nutrition Programs at Kansas State University, agrees. "The overarching theme here is partnership. This can take the form of an outstanding program trying to maintain or get better or a district that is struggling," he notes. "In either situation, a partnership between the director and the food safety inspector can really improve things."

Dr. Cleta Long, school nutrition director for Bibb County (Ga.) School District, doesn't need convincing. She gets it. "I see [the local health department] as another set of my eyes and ears," Long explains. "We have a long and trusted relationship and, as a result, I don't see them as adversaries; I see them as partners. They [act as] an extension of me and my staff."

Ask the Experts

We all know how easy it can be to overlook or block out things that we see day in and day out; it's the reason why some operations establish "mystery diner" and similar programs as a means to gain the constructive perspective of fresh eyes. The health inspection can offer the same outside point of view that can be invaluable in ensuring that all kitchen staff members are effectively implementing the food safety plan.

"Utilize your local environmental



MEASURE SUCCESS

health professionals' food safety expertise," urges USDA's spokesperson. "They may be able to help you fine-tune your school food safety plan based on HACCP principles, navigate produce safety issues, develop a food defense plan or understand your role in a foodborne outbreak investigation. Think outside of the box; the local health department can do more than just inspect your kitchen!"

Long recalls the aftermath of a tornado that struck her community five years ago. "We had about 14 freezers and coolers down," she recounts. "Because of our close relationship, the local health inspector was right there with us to ensure our food was safe and help us get back online as quickly as possible."

Everyday aid is available, too. For HACCP plans in particular, there is no one-size-fits-all approach that works for every district—or even for every school within a district. Including your health



inspector in the planning process can be a key strategy in implementing best practices and utilizing the HACCP plan fully. As Dr. Sauer explains, “You never know what that inspector might see to help advance the HACCP plan to the next level.” He continues, “Why *wouldn't* you want to invite them in to talk about your best practices? Schools should be proud to show the inspector their best practices and the elements of the plan that have shown improvements.”

It's That Time

But what about the main event? What are the key factors in making the actual food safety inspection less stressful and more productive? Does the following scenario sound familiar? The health inspector or auditor walks into the kitchen and suddenly, there's a mad dash of employees rushing around to make sure everything is in place as it should be.

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Top Violations

Cited by Health Inspectors

The Center of Excellence for Food Safety Research in Child Nutrition Programs at Kansas State University reviewed nearly 30,000 health inspections of schools across the country to identify the food safety violations at schools that are cited most often. “I thought we would see hand washing and employee behaviors as the major violations, but it was, surprisingly, not the case,” declares Dr. Kevin Roberts.

In fact, study findings showed that food code violations in school meal operations appear to pose relatively low food safety risks. The top five categories of food safety violations were as follows:



PREMISES & EQUIPMENT: Recurring citations in this area focused on ensuring that floors, walls, ceilings and attached equipment are clean and in good repair. This category also included issues such as ensuring that the facility itself is easy to clean and free of litter and that cleaning equipment is stored properly after use.



NON-FOOD CONTACT SURFACES: This category included problems keeping surfaces that *don't* come in contact with food (such as cooking surfaces, refrigerators, racks, dishwasher equipment, shelving and kitchenware) clean and in good repair.



FOOD PROTECTED FROM CONTAMINATION: In this category, problems arose in ensuring that food was protected from cross-contamination, particularly during consumer self-service, as well as from contact with unclean equipment, during tasting and through storage, preparation, display, service, transportation and cleaning steps.



WAREWASHING (MANUAL/MECHANICAL): Concerns in this area included the proper preparation and execution of dishwashing steps, both by hand and with equipment. This includes conducting regular tests for adequate temperature and sanitizer and maintaining logs to prove it.



FOOD CONTACT SURFACES: This area relates to keeping surfaces that do come in contact with food (such as cooking utensils, slicers, can openers, worktables, cutting boards and food containers) clean and sanitized when not in use.

If your health inspector identifies any of the above infractions (or others) at your school site, take the opportunity to ask for suggestions on how to improve in the cited areas so that you can avoid the same problems in the future. Remember that this person is an expert in food safety and sanitation and can be a great resource for you and your team.

For example, if warewashing was identified as below standard, discuss ways you can improve your protocols or procedures, as well as advice for staff training and supporting resources. If the facility itself is a problem, it might lead to a collaboration between the district director and the inspector to take the report to appropriate administrators or maintenance staff in order to facilitate timely repairs.

If your health inspector identifies violations of code, avoid a defensive, reactive response. Never forget that he or she shares your goal of serving safe meals to children. Don't be afraid to tap into that individual's knowledge and expertise to make it happen.

But, Sauer warns, “That's not effective, and it's not going to protect children.” Instead, he advises, “Continue to do what you do most days; that is really going to help determine what can be improved.” He offers another important insight that should be reinforced with everyone on the cafeteria team: “Inspectors are there to help. They aren't grading *you*; they are grading your *operation*.”

USDA recommends that a director, supervisor or manager accompany the environmental health professional during

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the inspection. “This will allow you to ask specific questions when a food safety violation is observed,” explains the FNS spokesperson. “It's hard to fully understand an inspection report if you don't observe the violations at the same time as the environmental health professional.”

There's another secret to avoiding later misunderstandings: “If you have questions about an observation, or violation, speak up—ask the environmental health professional for clarification,” says the USDA representative. “Remember, food safety requirements are in place to protect public health, and the environmental health professional should be able to tell you *why* a requirement is important.”



ROOM FOR IMPROVEMENT

Dr. Kevin Roberts, director of the Center of Excellence, echoes this advice. In addition, he advises, “Be familiar with your health code and what *your* municipality requires in the code.” There can be wide disparity in food safety standards. Many may follow the ServSafe or another training program, says Roberts, and expect all of those standards to be the rule, but the local rules for an area like cooling, for example, may be different. When in doubt, ask, ask, ask!

Even the best partnerships experience occasional communication breakdowns. If you disagree with an observation or a violation, make sure you work to resolve any disagreements onsite, *before* the health inspector leaves the school. “Once the environmental health professional leaves the school, your chances of having the report changed decrease...especially if you don’t say anything during the inspection!” asserts the USDA spokesperson. “Above all, respect each other. Positive communication will foster a productive relationship.”

The Sharpest Critic

Arguably the best way to ensure a 100% score on your health inspection is to consider implementing a *self-inspection* program. These “rehearsals,” as you might view them, allow you to combine that laser-focused perspective with continual staff training. Offer a site employee the chance to take on greater responsibility by assuming the role of inhouse inspector. Or consult and engage with a third party to conduct regular inspections and onsite

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training with staff. Such regular, thorough self-inspections can help identify problem areas early. Eileen Staples, director of food and nutrition service at Greenville County (S.C.) Schools, uses the third-party approach. “Our staff are always measured,” she explains, adding, “What gets measured gets done.”

Self-inspection reports also provide directors and managers with a ready-made opportunity to tailor the food safety

training program around designated high-risk behaviors and to spot weaknesses in food safety plans and protocols. “You are only as strong as your *least*-knowledgeable employee,” asserts Staples. “My staff is very knowledgeable. [But] you always need to challenge your people to become better.”

Staples is not alone in this thinking. According to the SNA’s *School Nutrition Operations Report 2011*, nearly three-quarters of school districts report that their state or local health department or district policy requires kitchen managers to be certified in food safety and sanitation—the highest level recorded by this periodic survey to date. In fact, nearly 6 in 10 districts require *all* staff to receive food safety and sanitation training.

The Report Card

The hard work you put into food safety benefits the children you serve each day by keeping them safe. Sauer offers an important closing reminder: Not all inspections will be perfect, he notes. If you do receive a food safety violation, use that as an opportunity to review your process, review your knowledge and excel in the future. In schools, health inspectors, “have to look hard to find violations. They *can’t* give everyone 100%; they have to give everyone some room to improve.”

But Long knows that those good grades *do* carry a lot of weight. “Our managers and staff are confident that the health inspectors are not there to be punitive; they are there to help them do a better job. The health inspectors validate the work we do every day. When my staff gets a 100% on an inspection, they know they have earned it!” **SN**

Arienne Corbett is managing director of Leading Health, LLC, in Arlington, Va., and a former manager of nutrition advocacy at SNA. Illustrations by **retrorocket/www.istockphoto.com**.

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