The Paper Chase: Documentation of your HACCP Plan

Cyndie Story, PhD, RD, CC, SNS
Catherine Strohbehn, PhD, RD, CP-FS
Carol Longley, PhD, RD
Affiliation or Financial Disclosure

• Culinary Solution Centers, LLC – Chef Cyndie & The K-12 Team
• SFS Pac®
• www.chefcyndie.com
Learning Objectives

• Communicate the key elements of HACCP to all district staff.
• Ensure food safety best practices are followed and documented in the school nutrition program
• Identify strategies to incorporate share tables in your HACCP plan
Competencies, Knowledge, and Skill

Maintain sanitation, safety, and security practices...Why?

- **Competency 2.1:** In compliance with local, state, and federal policies, procedures, and regulations.
- **Competency 2.2:** To protect the health and well-being of students, customers, and employees.
Professional Standards

• FOOD SAFETY AND HACCP TRAINING – 2600

• Employee will be able to effectively utilize all food safety program guidelines and health department regulations to ensure optimal food safety.

• 2620 – Practice food safety
• 2630 – Practice Federal, State, and local food safety regulations
• 2640 – Promote a culture of food safety
Is Safety of Food in Schools a Problem?

• The Center for Disease Control and Prevention (CDC) estimates that annually foodborne illness will cause:
  • 1 in 6 Americans (or 48 million people) to get sick
  • 128,000 to be hospitalized
  • 3,000 deaths

• Half of the reported cases of food borne illnesses occur in children under 15 years of age.

  *Most of the food borne illnesses affecting children do not occur in schools*
Could an FBI Happen in your District?

- Schools serve 37 million meals in the US daily
- FBI’s have occurred in schools
  - One glitch and an entire school is ill
  - Fresh produce potential
  - Emerging pathogens
- Child Nutrition and Reauthorization Act 2004 required food safety plan based on HACCP
- HHFKA 2010 enhanced food safety requirements in all locations food is served (i.e. Breakfast in Classrooms)
Annual Review is slated for next year!

• Skit – a manager worried about upcoming annual review
• What will state agency look for?
• What paper do I need to show?
KEEP CALM AND CARRY ON
What is HACCP?

• H have
• A a
• C cup of
• C coffee and
• P pray
What is HACCP?

- H  hazard
- A  analysis
- C  critical
- C  control
- P  point
Key Steps in Development

• Identify Risks - What are threats?
• What are Control Points – Where are threats in food flow?
• What are Critical Control Points – What is the last chance? What should be done?
• Monitoring – Check that standards are followed with documentation in logs
• Corrective Action – What is done when standards are not Recorded?
• Verifying – Double check that standards are met
• Evaluating – annual review of plan/update with changes
Developing a Food Safety Plan using the Process Approach

- Develop, document, and implement SOPs
- Identify and document all menu items
- Identify and document control measures and critical limits
- Establish monitoring procedures
- Establish corrective actions
- Keep records
- Review and revise
The Paper Chase

• Standard Operating Procedures (aka SOPs)
• Menu Categorization/Recipes
• Logs/Forms
Paper Chase: SOPs
ELEMENTS OF SOPs

Step by step written instructions of 

*WHY, WHAT, HOW, WHEN, and WHO*

SOPs should include:

1. Rationale/ Policy
2. Detailed description of procedure – standards/best practice
3. Monitoring actions / accountability
4. Corrective actions (if monitoring shows that SOP is not followed)
SOPs for YOUR District

• Each site has specific needs

• Districts vary with menus, equipment, production, and service options

• Fundamental SOPs address
  • Employee health and hygiene
  • Temperature controls
  • Cleaning and sanitizing
Standards or Best Practice AKA - Critical limits at each CCP

• Standards for safety **written statement** on recipes
• Generally focus on time and temperature
  o *Cook ground beef internal temperature 155°F*
  o *Keep cold TCS Foods at 41°F or below; hot TCS Foods above 135 °

• Based on science – *Food Code 2017*
• Measurable or Observable
• Incorporate best practices through use of SOP
  o Examples: Handwashing SOP
  o Cooling SOP applies to all TCS products
Sources – SOP SOS

Modifiable forms on line:

1) Iowa State University ([www.iowafoodsafety.org](http://www.iowafoodsafety.org))
2) State Agencies
3) Institute of Child Nutrition ([www.theicn.org](http://www.theicn.org))
4) Health Inspection Agencies
Activity: SOPs Needed for HACCP Plan in YOUR District

Review
- Review the Checklist for Standard Operating Procedures

Check
- Check yes, if your school has and uses the SOP

Check
- Check no, if your school does not have the SOP

Check
- Check N/A if SOP if not needed

Find
- Find a partner

Review
- Review with a partner SOPs you need for your school
Share Tables

• How many of you have been approached about offering a Share Table in your cafeterias?

• What actions do you take?
  • Develop an SOP (or use/modify from existing sources)
  • Check with local health authority regarding foods allowed and controls taken
  • Communicate
    • Schools with tables
    • Foods allowed
Paper Chase: Menu Categories and Recipes
Menu Item Categories: Process Approach

Complete Trips Through the Danger Zone

Danger Zone Diagram
No cook Process
Same Day Service Process
Complex Process
Other Category

• Process Category #4
• Non TCS foods
Which ingredient is a concern?
Process Category?

Which foods fit in what category?

- Indicate category 1, 2, 3 or 4

*Remember, it may depend!*

- Roast turkey roll
- Frozen pizza
- Ham and cheese deli sandwich
- Canned pears
Which Process Category?

**Complex #3**
- Roast turkey

**Same day #2**
- Frozen pizza
- Roast Turkey

**No Cook #1**
- Ham and cheese deli sandwich

**Non TCS #4**
- Canned peaches

<table>
<thead>
<tr>
<th>Entrees</th>
<th>Fruit/Veg</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>All reheated leftovers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chicken to be used in the following recipes:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Buffalo Chicken Deli Wrap</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chicken &amp; Fruit Salad</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chicken Caesar Deli Wrap</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chicken Caesar Salad</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chipotle Grilled Chicken Salad</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Crispy Chicken Salad</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Oriental Chicken Salad</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Process #3 - Complex Production.** The above menu items go through both heating and cooling, taking 2 or more complete trips through the danger zone. Key control steps include receiving, storage, preparation, cooking, cooling, reheating, hot holding and service.
- Receive at or below 41 degrees F
- Hold at or below 41 degrees F or at or above 135 degrees F
- Heat/cook to established cooking temperature
- Minimize bare-hand contact with all foods
- Cool according to established standards
- Reheat according to established standards
Paper Chase: Logs
Monitoring, Corrective Actions, and Verification
Monitoring

- Monitoring done by all employees
- Way to check progress and determine standards are met
- **Observed or measured**
- Results recorded and initialed
- Provides documentation (proof)
- Examples:
  - Check/record cooking & service temperatures w/calibrated, clean & sanitized thermometer
  - Check/record temperatures refrigerated storage
  - Check/record final rinse temperatures dish machine
Other Monitoring - Yes or No?

- Visitors to production area
- Checking credentials delivery personnel
- Storage of non-foodservice items
- Milk temperatures at delivery
- Concentration of chemical sanitizing solution
- Employee training
- Cleaning schedule
- Linen use
- Temperature of milk on field trips
- Time PHF exposed room temperature
- Handwashing
Successful Monitoring

• Responsible Person Identified and Trained
  o Why and What of Proper Monitoring
  o Multiple staff involved
  o Proper way to use equipment
  o CCPs and Critical limits
  o Methods for recording monitoring results
  o KIS – part of routine
  o What is done if there is a deviation?
Corrective Actions

• What to do *if* monitoring shows standard not met?

  Ex. ground beef does not reach 155°F
  • continue cooking and/or
  • recheck with another cleaned and sanitized calibrated thermometer

• Written direction through SOP provided in advance guides actions

• Document if corrective actions taken

• All can anticipate what might go wrong!
Record Keeping & Documentation

• Helps operation demonstrate *reasonable care*
• Provides **written record** standards met through proper monitoring
• Incorporate into SOP

*Ex: milk vendor records temperature of milk at delivery can reassure if any claims*
• Keep for six months minimum *(check with your SA)*
• Separate per control point/compile one form
Verification

• Methods to ensure standards met and that monitoring accurate

• Monitoring is a Check
• Verification is a Double Check

• Some are both – ex. Test strip temperature final rinse dish machine
Verification Actions

- Observe employees performing tasks
- Check CCP records
- Review critical limits
- Check monitoring records
- Check corrective action records
- Check process or finished products
- Check equipment calibration records
- Review employee training
Checklist of Record Keeping Forms

Review the Checklist of Record Keeping Form

Check “yes” if your school is using the form

Check “no” if your school is not using the form

Using the same partner as earlier, discuss ways you have found to combine some paperwork (i.e. Record receiving temperatures on invoices)
Wait – there is more!
Other Paperwork – Documentation

• Description of operation
• Menus into categories of risk
• Standard Operating Procedures (SOP) guide actions in foodservice flow of food - *Identify the why, the what, the who, and the when and how*
• Logs – record of actions taken
• Procurement and receiving records
• Training schedules – professional standards
Communication of Actions Taken to Keep Food Safe
You know the plan, do others in the district?

• Challenges in communicating within the district and to those not in the building every day

• Suggested communication methods
  • Be collegial – get out of the kitchen!
  • Use menus, newsletters, Friday Folders, websites
  • Consider actions taken to ensure safety of foods
  • Train staff and provide professional involvement
  • Use signage – entrances, access points, cafeteria, POS
    • Restrict access to production and storage areas
    • Provide Food Code or state health requirement as reference
Communication of Food Safety Efforts

• POST SIGNAGE
  • reference Health Inspectors or Food Code
• Tell your story
  • Communicate standards with signage
  • Enforce the standard
• Example SOP about visitors in kitchen
Communication with Audiences – Role Play

- Volunteers to play role of Nutrition Program staff and School Board President trying to enter kitchen
- Staff members point out to School Board President the **sign** that says must wear hairnet and wash hands when enter kitchen
- Sign includes reference to Policy and Food Code/State Code on sign
- Hairnets available by handwashing sink
Communicating the Message

• WWUD?
• Suspected false recordings of walk in temperatures
• Log reads 41 F for every entry
Paperwork Take-Aways

A plan is not a plan until it is in writing – it is just an idea

*Lee Iacocca

Documentation of good practices can be useful for:

• Identifying standards of practice
• Hiring, training and reviewing performance of employees
• Establishing a foundation/record of procedures for your operation.

No need to reinvent the wheel – Templates are available.
THANK YOU for making sure students have nutritious food safely prepared!

Are there any questions?
Evaluate This Session

Use the ANC App to evaluate the education sessions you attend and you will automatically be entered to win a FREE registration to ANC 2020 in Nashville.*

One entry per person. VOID WHERE PROHIBITED OR RESTRICTED BY LAW.
Thank You!