

# Mock Health Inspection



## Instructor's Manual



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**Time: 4 hours**

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**Key Area: 2**

**Code: 2600 Food Safety and HACCP**

**2017**

# Institute of Child Nutrition

## The University of Mississippi

The Institute of Child Nutrition was authorized by Congress in 1989 and established in 1990 at The University of Mississippi in Oxford and is operated in collaboration with The University of Southern Mississippi in Hattiesburg. The Institute operates under a grant agreement with the United States Department of Agriculture, Food and Nutrition Service.

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The purpose of the Institute of Child Nutrition is to improve the operation of child nutrition programs through research, education and training, and information dissemination.

### MISSION

The mission of the Institute of Child Nutrition is to provide information and services that promote the continuous improvement of child nutrition programs.

### VISION

The vision of the Institute of Child Nutrition is to be the leader in providing education, research, and resources to promote excellence in child nutrition programs.

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# Table of Contents

Training Overview and Objectives .....	1
Instructor Pre-Class Preparation .....	3
Preparation Checklist .....	5
Training-At-A-Glance .....	7
Functional Areas and Competencies .....	9
Professional Standards and Key Area .....	10
Lesson Plan .....	11
Objective: Explain why health inspections are conducted at least twice a year in schools .....	11
Objective: Explain the role of periodic inspections and self-inspections to enhance the effectiveness of food safety management programs .....	12
Objective: Identify risk-based food safety practices that should be evaluated in a school nutrition operation .....	13
Objective: Conduct a risk-based inspection .....	23
Reference List .....	57



## Training Overview and Objectives

Welcome to the Institute of Child Nutrition's *Mock Health Inspection* training. This training is intended to be a 4-hour, face-to-face and hands-on training that includes participant interaction in a mock inspection to improve retention of the learning objectives. Before class, the trainer will need to set up the classroom with the different activities including the inspection scenarios.

After completing this training, participants should be able to:

- explain why health inspections are conducted at least twice a year in schools,
- explain the role of periodic inspections and self-inspections to enhance the effectiveness of food safety management programs,
- identify risk-based food safety practices that should be evaluated in a school nutrition operation, and
- conduct a risk-based inspection.

### Prompts are as follows:

#### **SAY:**

What the instructor is to say to participants. This is the content that teaches the learning objectives.

#### **ASK:**

This prompt is used when the instructor should ask the participants a question. If the question warrants feedback, it will be followed by the FEEDBACK prompt.

#### **FEEDBACK:**

This prompt is used to ensure certain elements are covered in discussions, including possible answers for instructors to give.

#### **DO:**

This prompt is used to explain what the instructor/participants are to do. It may be used to lead into activities, do demonstrations, show videos, or any other action the instructor would need to know to do.

#### **SHOW SLIDE:**

This prompt is used for showing slides.





## Instructor Pre-Class Preparation

### Prepare to present the session:

1. Download and review the slide presentation, Instructor's Manual, video, Activities for Mock Health Inspection, and Participant's Workbook from <http://www.theicn.org>.
  - a. In the Instructor's Manual, review the scripted lesson, each activity, and the instructor's answer keys. Review the appropriate staging for the "mock inspection" environment.
  - b. Review the Participant's Workbook and worksheets.
  - c. Preview the video, *Mock Health Inspection*, from [www.theicn.org](http://www.theicn.org). Review the activity and video answer key.
  - d. Review the activities and scenarios in Activities for Mock Health Inspection.
  - e. Refer to the resource and reference list in the back of this Instructor's Manual for valuable website links the instructor can review for background information that will add a depth of knowledge to your presentation.
2. In the FDA Food Code, read *Annex 5 - Conducting Risk-based Inspections* and *Annex 7 - Model Forms, Guides, and Other Aids: Guide 3-B Instructions for Marking the Food Establishment Inspection Report*. These resources are imperative and will be helpful in building knowledge of specific items on the *Food Establishment Inspection Report* and how each line item should be assessed during an inspection. <http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm374275.htm>
3. Download and print *Ground Rules* posters from ICN. <http://www.theicn.org/ResourceOverview.aspx?ID=267>
4. It is up to states, territories, and Indian Health Service to choose which FDA Food Code they adopt. This list is ever changing. The Association of Food and Drug Officials (AFDO), under contract to the Food and Drug Administration (FDA), continues to gather data on which version of the Food Code has been adopted by which entities. This list can be found at: <http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm108156.htm>. It is beneficial to check this list to see which version of the FDA Food Code the state you are in or training in has adopted to be prepared for any differences that may exist.

### On the day of training before class – set up for the mock inspection in the classroom.

Prepare the mock inspection by posting the six (6) note cards with numbers (1-6) using blue painter's tape to label each mock inspection section. Label in a sequential method so groups can easily rotate from one area to the next.

Stage the following toolkit items in the 6 sections:

- 6-12 poster-sized photos of inappropriate food safety practices specific to the CDC Risk Factors mounted on poster board (11" x 17")
  - These posters (labeled for the appropriate section as Scenario 1-6) will be positioned around the classroom (corresponding to the correct scenario/section) to simulate examples of inappropriate food safety practices.
  - Printed copies of the scenarios will be positioned in each corresponding section with the photos, and can be taped to the wall with blue painter's tape.

Complete classroom set-up:

- Set up classroom tables with one Participant's Workbook, one name tent, and one pen per seat.
- Post the five color-coded foodborne illness risk factors on the wall (spread around the classroom) using blue painter's tape.
- Greet participants as they arrive. Have each person sign the Attendee Roster.

## Preparation Checklist

### Location-Provided Supplies:

- Flip chart pad & easel
- Microphone (preferably wireless)
- Projector and screen
- Multi-plug power strip and extension cord (for projector, laptop, and speakers)

### Mock Health Inspection Toolkit:

- Markers in 4-5 colors
- Blue painter's tape
- Items to stage the classroom's "mock-kitchen"
  - Photos/posters and scenarios for 6 mock-kitchen sections
  - Six (6) note cards with numbers (1-6) to label mock-kitchen sections
- Color-coded inspection observations cards (color-coded, printed shipping labels peeled and stuck on color-coded note cards) – to match the Risk Factor signs (below)
- Five (5) CDC Food Safety Risk Factor signs (8.5" X 11") printed on color-coded paper and laminated to match the observations:
  - Improper Holding/Time and Temperature (red)
  - Poor Personal Hygiene (green)
  - Inadequate Cooking (purple)
  - Contaminated Equipment/Protection from Contamination (blue)
  - Food from Unsafe Source (orange)

**Instructor's Note:** Copies of the five CDC Food Safety Risk Factor signs, Violation Observations, and scenarios with photos are also located in a separate document – Activities for Mock Health Inspection. These will be provided to ICN Consultant Trainers in the toolkit, and there is no need for you to re-print.

- Participant's Workbook – one per participant
- One copy per participant: *Food Establishment Inspection Report* available on the ICN website
- One copy per participant: Pre-Assessment and Post-Assessment (these are separate from the manuals)
- Hairnet (for brief demo)
- Gloves (for brief demo)
- Writing utensils (pencil or pen) – one per participant
- ICN Evaluation Forms
- ICN Attendee Roster
- Certificate of Attendance
- Name tents for each participant
- Sticky notes
- Ground Rules posters

**Instructor-Provided Supplies:**

- Laptop with presentation, remote, and videos
- External powered speakers
- Video – *Mock Health Inspection*
- Sound device such as bell, buzzers, etc.

## Training-At-A-Glance

Time	Topic	Activity	Materials
Pre-class	Set up classroom		Toolkit items – see staging of items in Instructor's Manual
<b>Introduction</b>			
15 minutes	Content Overview and Pre-Assessment		<ul style="list-style-type: none"> <li>• Participant's Workbook</li> <li>• Sign-In Sheet/Attendance Roster</li> <li>• Pre-Assessment</li> </ul>
<b>Objective: Explain why health inspections are conducted at least twice a year in schools.</b>			
5 minutes	Why health inspections are conducted in schools.		
<b>Objective: Explain the role of periodic inspections and self-inspections to enhance the effectiveness of food safety management programs.</b>			
15 minutes	Why health inspections conducted in schools are important.	Opening Icebreaker	<ul style="list-style-type: none"> <li>• Name tents</li> <li>• Flip chart pad and easel</li> <li>• Markers</li> </ul>
<b>Objective: Identify risk-based food safety practices that should be evaluated in a school nutrition operation.</b>			
45 minutes	Understanding the five CDC food safety risk factors.	<ul style="list-style-type: none"> <li>• Examples of CDC Food Safety Risk Factors</li> <li>• Categorize the CDC Food Safety Risk Factors</li> </ul>	<ul style="list-style-type: none"> <li>• <i>CDC Foodborne Illness Risk Factors</i></li> <li>• <i>CDC Foodborne Illness Risk Factors</i> Answer Key</li> <li>• Pens</li> <li>• CDC Risk Factor Signs</li> <li>• Observation cards</li> <li>• Blue painter's tape</li> </ul>

Time	Topic	Activity	Materials
<b>Objective: Conduct a risk-based inspection.</b>			
30 minutes	Video – <i>Mock Health Inspection</i>	Can You Spot the Issues?	<ul style="list-style-type: none"> <li>• <i>Mock Health Inspection Video</i></li> <li>• <i>Mock Health Inspection Video Answer Key</i></li> <li>• <i>Food Establishment Inspection Report</i></li> <li>• Computer to present slides and/or DVD and external speakers</li> <li>• Projector and screen</li> </ul>
<b>Break</b>			
75 minutes	Facilitate mock inspection.		<ul style="list-style-type: none"> <li>• <i>Mock Health Inspection Scenario</i></li> <li>• <i>Food Establishment Inspection Report</i></li> <li>• <i>Modeling Best Practices During an Inspection</i></li> <li>• Posted scenarios and photos for mock inspection</li> <li>• Hairnet</li> <li>• Gloves</li> </ul>
45 minutes	Debrief from mock inspection findings.		<ul style="list-style-type: none"> <li>• <i>Mock Health Inspection Scenario Answer Key</i></li> <li>• <i>Food Establishment Inspection Report</i></li> </ul>
<b>Wrap Up</b>			
10 minutes	Post-Assessment, Evaluations, and Conclusion		<ul style="list-style-type: none"> <li>• Post-Assessment</li> <li>• Evaluation Form</li> <li>• Sign-In Sheet/Attendance Roster</li> <li>• Certificates of Attendance</li> </ul>

## Functional Areas and Competencies

The functional areas, competencies, knowledge, and skills identified in this project provide a clear picture of the role of school nutrition professionals in food safety and protection tasks. The information in this training module can serve as a framework to identify the criteria for evaluating staff food safety compliance.

### Directors Functional Area 4: Food Security, Sanitation, and Safety

**Competency 4.1:** Establishes policies and procedures to ensure food is prepared and served in a sanitary and safe environment.

**Knowledge statements:**

- Knows basic principles and techniques of foodservice sanitation and food safety.
- Knows federal, state, and local sanitation and food safety requirements.
- Knows principles of foodborne illness prevention.

**Skills statements:**

- Ensures that all food safety inspection deficiencies are addressed competently and in a timely manner.
- Conducts routine food safety and sanitation inspections at each school nutrition site and develops corrective action plans, as needed.

### Functional Area 9: Program Management and Accountability

**Competency 9.2:** Provides leadership to position the school nutrition program as an integral component of the school district.

**Knowledge statement:**

- Knows fundamentals of continuous quality improvement processes.

**Skills statements:**

- Monitors a HACCP-based food safety and sanitation program that meets federal, state, and local regulations.

Source: *Competencies, Knowledge, and Skills of District-Level School Nutrition Professionals in the 21st Century* available on the ICN website: <http://www.theicn.org/documentlibraryfiles/PDF/20090514085653.pdf>

## Managers

### Functional Area 3: Sanitation, Safety, and Security

**Competency 3.1:** Provides an environment conducive to protecting the health and well-being of the school's children through high levels of sanitation standards.

**Knowledge statements:**

- Knows state and local code requirements for foodservice establishments.
- Knows basic principles for foodservice sanitation for equipment, personnel, food, and facility.
- Knows procedures to follow to prevent bacterial food poisoning.
- Knows principles of personal hygiene.
- Knows importance of school district maintaining a food safety policy.

**Skills statements:**

- Implements a system to protect food at all times from contamination agents such as unclean equipment and utensils, pests and rodents, unnecessary handling, poor hygiene habits, and inadequate sanitary facilities.
- Corrects foodservice deficiencies noted on sanitation inspection reports by Public Health Department.
- Maintains a copy of state and local health regulations at the school site.

Source: *Competencies, Knowledge, and Skills of Effective School Nutrition Managers* Available on the ICN website:  
<http://www.theicn.org/ResourceOverview.aspx?ID=131>

## 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.**

**Key Area: 2**



## Lesson Plan

### Introduction

**SHOW SLIDE:** *Mock Health Inspection*

**SAY:** I am pleased to be here today. The Institute of Child Nutrition (ICN) partners with USDA's Food and Nutrition Service (FNS) to provide training opportunities for child nutrition professionals on current issues such as food safety and protection. Today we will learn about risk-based inspections. Our goal is to start looking at our kitchen through the eyes of an environmental health specialist!

Specifically our objectives are to:

- explain why health inspections are conducted at least twice a year in schools,
- explain the role of periodic inspections and self-inspections to enhance the effectiveness of food safety management programs,
- identify risk-based food safety practices that should be evaluated in a school nutrition operation, and
- conduct a risk-based inspection.

Everyone should have a Participant's Workbook. In addition to the valuable take-home resources, this workbook includes the activities we will be doing together.

**DO:** Pre-Assessment.

**SAY:** I am going to pass out the Pre-Assessment. Please do not write your name on the assessment, instead write some kind of identifier in the top right corner. Identifiers can be the last four (4) digits of your phone number, a favorite word, etc. Please remember your identifier so you can use it later on your Post-Assessment. Answer the questions to the best of your ability. We will go over the content during the training, and we will review the answers at the end of our training. This activity should take about five (5) minutes and is meant to be done individually.

**Objective: Explain why health inspections are conducted at least twice a year in schools.**

**SHOW SLIDE:** *Why are Health Inspections Important?*

**SAY:** Health inspections are a critical part of a strong food safety program. The Child Nutrition Reauthorization Act of 2004 implemented the requirement for a food safety program based on Hazard Analysis and Critical Control Point (HACCP) principles for school nutrition programs. Since that time we have developed, trained on, and implemented important policies and procedures that focus on providing safe food. The Reauthorization Act of 2004 also increased the number of required health inspections from one to two per year for sites participating in the National School Lunch Program.

**Objective: Explain the role of periodic inspections and self-inspections to enhance the effectiveness of food safety management programs.**

**SAY:** Let's get to know each other.

## **ACTIVITY – Opening Ice Breaker**

**SAY:** In addition to the “letter of the law” requirements of the Reauthorization Act, let's start out by getting your opinion on the importance of routine inspections in your school nutrition operation. Please fold your name tent in half and put your first name in large letters on one side. On the back side write your opinion to the question, “*Why are health inspections and self-inspections important?*”

**DO:** Allow participants 1-2 minutes to do this independently.

**SAY:** Now get up and introduce yourself to someone you do not know, or do not know well. Share your opinion.

**DO:** Allow participants 2-5 minutes to meet and share their opinion.

**SAY:** Okay, please stay where you are. Introduce yourself and share your opinion. It is okay to repeat what someone else has said.

**DO:** Allow participants to share their name and opinion. Write (paraphrase) the participants' comments on the flip chart, putting a check mark beside duplicate comments.

**FEEDBACK:**

- Make sure we are providing the safest food possible
- To prevent foodborne illness outbreaks
- Let us know what we are doing right and help us correct what we are doing wrong
- Identify where we need to make changes to our procedures and training
- Provide us with on-the-spot recommendations to protect food

**SAY:** These are great answers. You can return to your seats.

Health inspections, whether done by an environmental health specialist or internally as a self-inspection, are an important part of food protection. Every action we take impacts the safety of the meals we prepare and serve. Inspections make us aware of food safety and food protection issues we might have and give school nutrition programs the opportunity to correct them. This continuous improvement helps to keep our food safer. We recommend that schools perform self-inspections routinely, at least once a month.

**Objective: Identify risk-based food safety practices that should be evaluated in a school nutrition operation.**

**SHOW SLIDE: How Food Becomes Unsafe**

**SAY:** The Centers for Disease Control and Prevention (CDC) estimates that each year 1 in 6 Americans (48 million people) get sick, 128,000 are hospitalized, and 3,000 die of foodborne diseases. Five practices and behaviors have been commonly identified by the CDC as contributing factors in foodborne illness outbreaks. These are referred to as the foodborne illness risk factors for outbreaks. Some of these factors are associated with time/temperature control for safety foods (TCS foods) especially those frequently related to foodborne illness. As you can see, we have the five risk factors posted around the room.

**DO:** Point to the location of the signs and read:

- Improper Holding/Time and Temperature
- Poor Personal Hygiene
- Inadequate Cooking
- Contaminated Equipment/Protection from Contamination
- Food from Unsafe Sources

## ACTIVITY – Examples of CDC Food Safety Risk Factors

**Instructions:** Have the participants turn to the **CDC Foodborne Illness Risk Factors** handout. Break them into groups of five by having them count off. Assign each group a CDC risk factor and give them 5 minutes to write examples of the risk factor. Ask them to pick a reporter to report for their team as you prompt them with questions in the script. Tell them to write down examples of the other risk factors not assigned to them. Write some of the examples on flip chart paper.

**SAY:** Please turn in your Participant's Workbook to the **CDC Foodborne Illness Risk Factors** handout. I will have you count off by fives, and then get into groups with your number. I will assign you one of the CDC risk factors, and I want your team to write down several examples of your assigned risk factor. You will choose a reporter who will share your team's answers. Make sure to write down examples you hear as the other groups report on the other four risk factors.

**DO:** Count off the participants by fives into new groups. Assign each group one of the CDC risk factors. Give them 5 minutes to complete their task. Prompt the first group to respond with the questions in the script. Write some of the examples on flip chart paper.

**ASK:** (To the first group) What are some examples of improper **hot and cold holding temperatures and times**?

**DO:** Wait for the assigned team reporter to answer, and then relate this to the foodborne illness risk factor and outbreaks.

**FEEDBACK:** improper cooling procedures, thawing at room temperature, improper temperatures of cold holding equipment, improper functioning hot holding equipment, exceeding date marking times

**SAY:** That is correct, and if TCS food is not held at safe temperatures, and in the temperature danger zone, this provides pathogens the right temperature conditions to grow.

**ASK:** (To the next group) What are some examples of **poor personal hygiene**?

**DO:** Wait for the assigned team to answer, and then relate this to the foodborne illness risk factor and outbreaks.

**FEEDBACK:** lack of handwashing, bare hand contact with ready to eat food, ill employees not excluded or restricted, dirty uniform, long nails or false nails

**SAY:** That is correct, and poor personal hygiene can lead to an individual contaminating food with pathogens from their dirty uniform, stool, skin, saliva, or vomit.

**ASK:** (To the next group) What are some examples of **inadequate cooking**?

**DO:** Wait for the assigned team to answer, and then relate this to the foodborne illness risk factor and outbreaks.

**FEEDBACK:** not cooking or reheating TCS foods to the required internal temperatures, malfunctioning equipment

**SAY:** That is correct, and cooking is an important “kill step” to eliminate pathogens on and in TCS food.

**ASK:** (To the next group) What are some examples of **contamination**?

**DO:** Wait for the assigned team to answer, and then relate this to the foodborne illness risk factor and outbreaks.

**FEEDBACK:** lack of or inadequate cleaning and sanitizing of food contact surfaces, cross contamination through improper storage, not separating raw and ready-to-eat foods

**SAY:** That is correct, and these conditions allow pathogens to contaminate food or food contact surfaces and make them unsafe.

**ASK:** (To the last group) What are some examples of **unsafe food sources**?

**DO:** Wait for the assigned team to answer, and then relate this to the foodborne illness risk factor and outbreaks.

**FEEDBACK:** using home prepared/canned foods or foods from unapproved vendors, receiving TCS foods at inappropriate holding temperatures, or receiving foods with packaging in poor condition

**SAY:** That is correct, and if we receive unsafe food, there is very little we can do to make that food safe.

## ACTIVITY – Categorize the CDC Food Safety Risk Factors

**Instructions:** The instructor will again point out the five CDC Food Safety Risk Factor signs placed around the room. Depending on the size of the group, each person or each group will receive a color-coded inspection observation card (for larger groups, one per group). ***(Do not reveal to the class that their observation cards are color-coded yet!)*** Individuals or groups will pair the observation on their card to the CDC Food Safety Risk Factor on the wall. Use blue painter's tape to hang observations that are written on index cards, or remove the back to expose the adhesive for observations that are printed on labels. Participants will stay standing near their observation. The color of the font on the observation cards is color-coded to match the color of each risk factor sign. Have participants whose observations do not match the risk factor sign to move their card to the correct sign. Go through each risk factor and discuss how the observation meets the risk factor.

**SAY:** Let's look at common issues cited during a food safety inspection and how they would be categorized as food safety risk factors.

**DO:** Give each person or group one observation card. ***(Do not reveal to the class that their observation cards are color-coded yet!)***

**SAY:** Each person (or group) has 1-3 inspection observation cards. Please get up and walk to the risk factor that best relates to your observation, and post it on the wall under the risk factor sign. Stay standing near your risk factor sign. If you need to reference any important food related temperatures for this activity, please refer to the **Important Food-Related Temperatures Chart** in your Participant's Workbook.

**DO:** Allow 2-3 minutes to post observations on the wall. Note the color coding to see if the observations have been posted correctly by participants.

**SAY:** Let's double check our work. Note the color of each risk factor sign and the color of the words on your observation. Do they match? If not, let's move them to the correct location.

**DO:** Give participants 1-2 minutes, if necessary, to move observations to the correct risk factor sign.

**SAY:** Okay – let's review.

**DO:** Walk to each sign and read 1-2 examples of the observations. Discuss how the observations fit into each risk factor and how these issues could lead to a foodborne illness outbreak. Answer any questions participants may have.

**SAY:** The reasoning for why each observation is under each risk factor is provided in your workbook's appendix in the **CDC Food Safety Risk Factors Answer Key**.





## CDC Food Safety Risk Factors Answer Key

### Improper Holding/Time and Temperature

Observation	Reasoning
Observed unopened cartons of milk that had been served at breakfast time being recovered in the dish room and saved to re-serve to lunch customers during the lunch period.	Cannot determine how long milk (a TCS food) was held in the temperature danger zone.
Observed pans of macaroni and cheese at 82 °F and 71 °F in the walk-in refrigerator that had been cooling for 3 hours.	TCS food did not reach the proper cooling temperatures in the correct amount of time: It must be below 70 °F within the first 2 hours of cooling.
Observed carrots, cheese, and black beans that were prepared and date marked 8 days ago are being used for meal prep.	It is recommended that prepared TCS foods and leftovers be used within 7 days.
Observed lasagna on the serving line being held at 120 °F.	Hot TCS food should be held at 135 °F or higher.
Observed large pot of chili placed in the refrigerator for cooling. Temperature measured at 170 °F.	Leaving hot TCS food in a large pot is an ineffective cooling method. The food should have been distributed into shallow 2-inch pans and/or placed in an ice water bath. The food is still too hot.
Observed tuna salad prepared and placed directly on the serving line. Temperature measured at 75 °F.	Tuna salad (a TCS food) is in the temperature danger zone. Pre-chilling ingredients, thoroughly chilling the prepared salad to 41 °F or lower, and only pulling the item from the cooler right before preparation and service can help keep tuna salad cool.
Observed cooler/refrigerator #1 registering a temperature of 51 °F.	The refrigerator should hold TCS foods at 41 °F or lower.
Observed chicken thawing at room temperature in stagnant water in the food prep sink.	This is an improper thawing method. It encourages pathogen growth.
Observed ready-to-eat (RTE) turkey strips in the refrigeration unit were not properly dated.	Without a proper date, it cannot be determined if the TCS food has exceeded its storage limit of 7 days.

Observation	Reasoning
Observed one pan of turkey and cheese sandwiches sitting at room temperature. Measured temp at 78 °F.	Cold TCS food should be held to keep it at 41 °F or below.

## Poor Personal Hygiene

Observation	Reasoning
Observed salad ingredients being prepared with bare hands.	No bare hand contact with RTE foods.
Observed hand soap was not available at one of the handwashing stations on the far side of the kitchen.	It is required for sinks to be properly stocked with water, soap, disposable towels, signage, and a trash can.
Observed no soap in women's restroom, no hand towels at the kitchen handsink, signs missing in the kitchen, and two employees using the triple sink for handwashing.	It is required for sinks to be properly stocked with water, soap, disposable towels, signage, and a trash can. Also, employees should only use designated sinks for washing hands. Signs are reminders of the importance of handwashing.
Observed employee washing hands without any available soap and without drying hands.	It is required for sinks to be properly stocked with water, soap, disposable towels, signage, and a trash can.
Observed employee washing hands in the food prep sink.	Employees should only wash their hands in designated handwashing sinks (unless there are procedures for cleaning and sanitation in places that are pre-approved by the health department).
Observed employee without a hair restraint preparing raw chicken.	Hair restraints are required to work with food.
Observed employee eating in the food preparation area.	Employee should eat food only in a designated place away from the production area (with the exception of properly tasting prepared food).
Observed an employee tasting food using a finger.	Employees should use proper tasting procedures to taste food, which includes using a single-use utensil.

## Inadequate Cooking

Observation	Reasoning
Observed hamburgers on the serving line with rare, pink centers. Temperature measured at 110 °F.	This TCS food was not properly cooked to the required internal temperature.
Observed raw shell eggs prepared for hot holding online for later service cooked to 145 °F.	Eggs cooked for immediate service are cooked to 145 °F, but raw eggs that are cooked and hot held for later service must be cooked to 155 °F.
Observed half pans of rice and corn being reheated in the steam wells.	Steam wells are not acceptable equipment for rapid reheating of TCS food.

## Contaminated Equipment/Protection from Contamination

Observation	Reasoning
Observed a bucket of quat sanitizer being used to wash prep tables. The sanitizer solution was dirty and did not register a color on the sanitizer test strip.	Solution was not at a concentration to effectively sanitize. Tables should first be washed with soap and water, rinsed, and then sanitized. Also dirty bucket water should be changed, and the sanitizer should be at the correct concentration.
Observed build-up of food on the slicer blade. Equipment was not in use.	To avoid cross contamination, the slicer must be washed, rinsed, and sanitized after each use or (if continually used) at 4-hour intervals.
Observed unwashed veggies stored over cut and prepared veggies. Observed raw chicken stored over cooked chicken in tubs.	This method of storage encourages cross contamination. Store ready-to-eat foods above other foods. Store raw chicken on the bottom shelf.
Observed food storage containers in refrigeration and dry storage heavily soiled on the outside and on the rims of the containers.	Dirty containers could lead to contamination of food and food contact surfaces.
Observed three live cockroaches and flies in the food preparation area.	Pest control methods are required to prevent contamination of food and food contact surfaces.

Observation	Reasoning
Observed heavy food debris and grease deposits on, in, under, and around cooking line, prep tables, inside refrigeration including shelving, and underside of the standing mixer.	Facilities must be clean to prevent contamination of food and attracting pests. This includes both food and non-food contact surfaces.
Observed knives with visible dried food debris stored on the knife rack. Observed a rice scoop stored in a bulk container with a ring of debris around the handle.	Utensils must be properly washed, rinsed, and sanitized after each use or at 4-hour intervals under constant use.
Observed raw, uncovered chicken stored inside the 2-door cooler over ready to eat vegetables and uncovered cooked rice.	Raw chicken should be stored on the bottom shelf to prevent cross contamination.
Observed an unlabeled chemical bottle and dish liquid stored with bags of rice.	Chemicals should always be labeled and stored separately from food.
Observed sanitizer in third sink, did not register a color change on test strip.	Sanitizer should be used at the proper concentration to ensure it effectively sanitizes.
Observed steam table pans and plastic containers were stored right-side-up in various locations.	Containers should be stored upside down to prevent contamination from debris and dust.
Observed cutting board with deep cuts containing food debris.	Cutting boards with deep cuts should be replaced as deep cuts are hard to clean and gathered food can encourage pathogen survival/growth.
Observed employee handling dirty food trays and then handling clean food trays without washing hands in-between.	Hands must be washed after handling dirty dishes and before handling clean ones to avoid recontaminating clean dishes.
Observed food contact surfaces and utensils not being sanitized after cleaning due to the improper operation of a mechanical warewashing machine.	If a warewashing machine is malfunctioning, it should not be used. A three-compartment sink should be used instead.

## Food from Unsafe Source

Observation	Reasoning
Observed a dented can of pinto beans being stored with the undented cans of beans.	Dented cans should be rejected or discarded as it is unsure whether the seal has been damaged.
Observed personal food being stored with operation's food in the walk-in cooler.	Personal food should be stored away from food used for production, preferably in a separate refrigerator.

**SAY:** Great work. You may take your seat.

**Objective: Conduct a risk-based inspection.**

**SHOW SLIDE:** *Can You Spot the Issues?*

**DO:** Distribute the *Food Establishment Inspection Report* form to participants.

**SAY:** We are going to use the *Food Establishment Inspection Report* for our next two activities. Let's review the form.

FORM 3-A

<b>Food Establishment Inspection Report</b>										Page ____ of ____		
As Governed by State Code Section XXX.XXX					No. of Risk Factor/Intervention Violations			Date				
Do Good County					No. of Repeat Risk Factor/Intervention Violations			Time In				
12344 Any Street, Our Town, State 11111					Score (optional)			Time Out				
Establishment			Address		City/State			Zip Code		Telephone		
License/Permit #			Permit Holder		Purpose of Inspection			Est. Type		Risk Category		
<b>FOODBORNE ILLNESS RISK FACTORS AND PUBLIC HEALTH INTERVENTIONS</b>												
Circle designated compliance status (IN, OUT, N/O, N/A) for each numbered item IN=in compliance    OUT=not in compliance    N/O=not observed    N/A=not applicable    COS=corrected on-site during inspection    R=repeat violation												
<b>Compliance Status</b>										COS	R	
<b>Supervision</b>												
1	IN OUT	Person in charge present, demonstrates knowledge, and performs duties										
2	IN OUT N/A	Certified Food Protection Manager										
<b>Employee Health</b>												
3	IN OUT	Management, food employee and conditional employee; knowledge, responsibilities and reporting										
4	IN OUT	Proper use of restriction and exclusion										
5	IN OUT	Procedures for responding to vomiting and diarrheal events										
<b>Good Hygienic Practices</b>												
6	IN OUT N/O	Proper eating, tasting, drinking, or tobacco use										
7	IN OUT N/O	No discharge from eyes, nose, and mouth										
<b>Preventing Contamination by Hands</b>												
8	IN OUT N/O	Hands clean & properly washed										
9	IN OUT N/A N/O	No bare hand contact with RTE food or a pre-approved alternative procedure properly allowed										
10	IN OUT	Adequate handwashing sinks properly supplied and accessible										
<b>Approved Source</b>												
11	IN OUT	Food obtained from approved source										
12	IN OUT N/A N/O	Food received at proper temperature										
13	IN OUT	Food in good condition, safe, & unadulterated										
14	IN OUT N/A N/O	Required records available: shellstock tags, parasite destruction										
<b>Protection from Contamination</b>												
15	IN OUT N/A N/O	Food separated and protected										
16	IN OUT N/A	Food-contact surfaces: cleaned & sanitized										
<b>GOOD RETAIL PRACTICES</b>												
Good Retail Practices are preventative measures to control the addition of pathogens, chemicals, and physical objects into foods. Mark "X" in box if numbered item is <b>not</b> in compliance    Mark "X" in appropriate box for COS and/or R    COS=corrected on-site during inspection    R=repeat violation												
<b>Safe Food and Water</b>										COS	R	
30		Pasteurized eggs used where required										
31		Water & ice from approved source										
32		Variance obtained for specialized processing methods										
<b>Food Temperature Control</b>												
33		Proper cooling methods used; adequate equipment for temperature control										
34		Plant food properly cooked for hot holding										
35		Approved thawing methods used										
36		Thermometers provided & accurate										
<b>Food Identification</b>												
37		Food properly labeled; original container										
<b>Prevention of Food Contamination</b>												
38		Insects, rodents, & animals not present										
39		Contamination prevented during food preparation, storage & display										
40		Personal cleanliness										
41		Wiping cloths: properly used & stored										
42		Washing fruits & vegetables										
<b>Proper Use of Utensils</b>										COS	R	
43		In-use utensils: properly stored										
44		Utensils, equipment & linens: properly stored, dried, & handled										
45		Single-use/single-service articles: properly stored & used										
46		Gloves used properly										
<b>Utensils, Equipment and Vending</b>												
47		Food & non-food contact surfaces cleanable, properly designed, constructed, & used										
48		Warewashing facilities: installed, maintained, & used; test strips										
49		Non-food contact surfaces clean										
<b>Physical Facilities</b>												
50		Hot & cold water available; adequate pressure										
51		Plumbing installed; proper backflow devices										
52		Sewage & waste water properly disposed										
53		Toilet facilities: properly constructed, supplied, & cleaned										
54		Garbage & refuse properly disposed; facilities maintained										
55		Physical facilities installed, maintained, & clean										
56		Adequate ventilation & lighting; designated areas used										
Person in Charge (Signature)										Date:		
Inspector (Signature)										Follow-up: YES NO (Circle one) Follow-up Date:		

**Risk factors** are important practices or procedures identified as the most prevalent contributing factors of foodborne illness or injury. Public health interventions are control measures to prevent foodborne illness or injury.



**SAY:** The ultimate responsibility for the safety of the food we provide lies with all school nutrition employees and our ability to develop and maintain effective food safety procedures. These procedures should focus on preventing the five foodborne illness risk factors. Routine inspections by environmental health specialists and our own self-inspections help identify and correct issues specific to the risk factors which could lead to an outbreak.

**DO:** For impact, as you discuss the risk factors on the **Food Establishment Inspection Report**, move to each risk factor sign posted around the room, and point out these sections on the form (have your form with you) to participants as you walk past their seats.

**SAY:** As we look at the top portion of the **Food Establishment Inspection Report**, we can see the foodborne illness risk factors are the basis for inspections and for identifying “priority” or “critical” violations. These terms will vary by state and the version of food code your state has adopted. “Priority” is the term used by the current *Food Code*, but earlier versions used the term “critical”. “Priority” or “critical” items contribute directly to hazards associated with foodborne illness – for example, not cooking foods to the proper temperature. According to the FDA, compliance with priority items is vital in preventing foodborne illness.

The top left portion of the form contains items to assess compliance with employee health and personal hygiene practices, and purchasing food from approved sources. Going from the bottom left to the bottom right side of the form are items used to evaluate compliance in protecting food and food contact surfaces from contamination. On the top right side of the form are items to assess temperature and time control during hot and cold holding as well as during cooking and reheating. Also included are items related to additional public health interventions: Consumer Advisory, Highly Susceptible Populations, Food/Color Additives and Toxic Substances, and Conformance with Approved Procedures.

**Instructor's Note:** A review of FDA Food Code *Annex 5 - Conducting Risk-based Inspections* and *Annex 7 - Model Forms, Guides, and Other Aids: Guide 3-B Instructions for Marking the Food* will be helpful in answering specific questions that may arise: <http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm374275.htm>. Also check the FDA website to see which version of the *Food Code* has been adopted by the state you are in: <http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm108156.htm>.

**SAY:** At the bottom of the form are Good Retail Practices or GRPs. These items evaluate the overall sanitation and basic operational preventive measures, which support risk factor control. Non-compliance would be identified as “priority foundation and core” or “non-critical” violations. These items support the “priority” items – for example, having access to accurate thermometers so temperatures can be monitored.

The final two pages of the **Food Establishment Inspection Report** form are for documenting our specific observations. Let's use this form and practice looking at an operation "through the eyes of an environmental health specialist."

**SHOW SLIDE:** ***Mock Health Inspection Video***

## **ACTIVITY – Can You Spot the Issues?**

**Instructions:** Participants will use the ***Mock Health Inspection Video*** handout to write down incorrect observations as they watch the *Mock Health Inspection* video. When prompted by the video, the instructor will pause the video to discuss what observations were seen, why they were out of compliance, what CDC risk factor they relate to, and use the **Food Establishment Inspection Report** to determine on which line the observation would be marked. Answer any questions after the video is complete.

**SAY:** We are going to watch a video taken in a few school nutrition programs. While the video is running, look for any food safety violations. The video pauses several times throughout to give you an opportunity to write down your observations on the ***Mock Health Inspection Video*** handout. Please watch the video until the pause so that you do not miss anything. When the video is over, I will give you several minutes to complete the handout. You will write which CDC Risk factor is related to each observation and where each observation can be found on the **Food Establishment Inspection Report**.

**DO:** Play the video.

\*Trainer tip: while you can embed this video into slide presentation, for this activity the video will have to be stopped and started frequently. It may be more practical to exit the presentation and use this video separately.

\*Technology Tip: If you choose to embed the WMV version of the video into the presentation slide: Select — Insert on the toolbar. Choose — Video on the toolbar ribbon and the drop down — Video from File. Locate the folder containing the video; select the video and select — Insert. For additional assistance contact ICN's Information Services through the ICN Help Desk. If you are using an Apple product, please contact ICN for a MP4 version of the movie which is compatible.

**SAY:** Okay, now take a few minutes to review the issues you observed and note on your video viewing guide (1) why the observation was out of compliance, (2) to which risk factor it is related, and (3) to which line on the Inspection Report this violation relates.

**DO:** Allow participants 5 minutes to complete their ***Mock Health Inspection Video*** handout with use of the **Food Establishment Inspection Report**. Solicit feedback on what was observed and where this would be documented on the Inspection Report form. Refer to the answer key for the complete list of observations.



**Instructor's Note:** You are provided with the reason why the observations from the video are out of compliance. Participants are not asked to write why the line is out of compliance, but the answer is provided for the benefit of the trainer.

**ASK:** Who saw an issue related to the risk factor **incorrect hot and cold holding temperatures/times**?

**DO:** Discuss 1-2 observations and relate this to outbreaks, the foodborne illness risk factors, and confirm/clarify the cited Inspection Report line items.

**ASK:** Who saw an issue related to the risk factor **poor personal hygiene**?

**DO:** Discuss 1-2 observations and relate this to outbreaks, the foodborne illness risk factors, and confirm/clarify the cited Inspection Report line items.

**ASK:** Who saw an issue related to the risk factor **inadequate cooking**?

**DO:** Discuss 1-2 observations and relate this to outbreaks, the foodborne illness risk factors, and confirm/clarify the cited Inspection Report line items.

**ASK:** Who saw an issue related to the risk factor **contamination**?

**DO:** Discuss 1-2 observations and relate this to outbreaks, the foodborne illness risk factors, and confirm/clarify the cited Inspection Report line items.

**ASK:** Who saw an issue related to the risk factor **unsafe food sources**?

**DO:** Discuss 1-2 observations and relate this to outbreaks, the foodborne illness risk factors, and confirm/clarify the cited Inspection Report line items.

**SAY:** All incorrect food handling issues in the video, the explanation of the violation, the associated risk factors, and the correct line items are provided in your workbook's appendix in the ***Mock Health Inspection Video Answer Key***.

**DO:** Instruct participants to take a 10-minute break.



## Mock Health Inspection Video Answer Key

Observation	CDC Risk Factor	Line on Form	Why Observation is Out of Compliance
Ill employee does not report her symptoms to manager, even when being reminded of the importance	Poor Personal Hygiene	3,4	Sick employees can infect food, other employees, and children.
Inadequate handwashing (no soap used, just a 'splash-n-dash' length)	Poor Personal Hygiene	8	Improper handwashing may lead to foodborne illness outbreak due to pathogens remaining on hands.
No paper towels, used her apron to dry (inadequate handwashing facilities)	Poor Personal Hygiene	10	Using disposable towels to dry hands prevent contamination of clean hands, especially when turning off the sink faucet.
Wore her apron into the restroom	Protection from Contamination	40	The apron comes in contact with pathogens in the restroom, then, if not replaced, with food and food contact surfaces. Aprons should be removed and left in the food production area for any break.
Employee blows into gloves before putting them on	Protection from Contamination	39, 46	Contaminating the gloves with pathogens from the mouth.
All this clip shows is double gloving and ill-fitting gloves	Poor Personal Hygiene	46	Food particles and pathogens can get in-between the gloves. Double gloving for convenience is not an approved procedure.
Improperly cleaned hands (sneezed onto gloves without replacing/rewashing)	Poor Personal Hygiene	8, 39, 46	After sneezing, the gloves need to be thrown away, hands washed, and new gloves put on to prevent the spread of pathogens.
Bare hand contact with RTE food (cutting lettuce w/o gloves)	Poor Personal Hygiene	9	Bare hand contact with RTE foods increases the risk of pathogens getting into food.

Inadequate cold holding (52 °F, instead of <41 °F)	Improper Holding/Time and Temperature	22	Holding TCS food in the temperature danger zone (41-135 °F) will allow for the growth of pathogens.
Improper date marking (using day – Tuesday – instead of date)	Improper Holding/Time and Temperature	23	Improper date marking prevents FIFO rotation and could lead to the use of spoiled foods and prevents food traceability.
Inadequate cold holding (49 °F, instead of <41 °F)	Improper Holding/Time and Temperature	22	Holding TCS food in the temperature danger zone allows for the growth of foodborne pathogens.
Bare hand contact with RTE food (touches melon to “feel” temp)	Poor Personal Hygiene	9	Bare hand contact with RTE foods increases the risk of pathogens getting into food.
Employee writes down a different temperature (41 °F) than what was on the thermometer (49 °F)	Improper Holding/Time and Temperature	22	TCS cold food should be 41 °F or below. This food is not safe to serve. Falsifying records is illegal.
Inappropriately stored towel	Contaminated Equipment/ Protection from Contamination	41	Towel should be stored in sanitizer under the table and away from food.
Food contact surface – thermometer contaminated by towel	Contaminated Equipment/ Protection from Contamination	16, 39	The thermometer contaminated by wiping with unsafe towel, can then contaminate the food it is used in.
Food is undercooked as thermometer reads 106.8 °F	Inadequate Cooking	18 or 19 (if reheating)	TCS foods must be cooked to proper internal cooking temperatures to ensure that pathogens associated with the food are destroyed.
Thermometer reads 148.9 °F in beef patties, instead of a minimum of 155 °F – beef patty visibly undercooked	Inadequate Cooking	18	TCS foods must be cooked to proper internal cooking temperatures to ensure that pathogens associated with the food are destroyed. Visually seeing that the meat is brown on the outside is not an indicator of doneness.

Using an inappropriately stored towel to wipe face, then wipe a food contact surface	Contaminated Equipment/ Protection from Contamination	16, 39, 41, 44	The food contact surface has been contaminated with the towel used to wipe someone's face.
Eggs stored above RTE/produce	Contaminated Equipment/ Protection from Contamination	15	When stocking shelves, place RTE items near the top and put other foods on the shelf by increasing internal cooking temperatures as you go down.
Wiping hands on apron	Contaminated Equipment/ Protection from Contamination and Poor Personal Hygiene	8, 39, 40	Improperly removing pathogens from hands and creating a source of future cross contamination on the apron if not removed/replaced.
Dirty apron in contact with tomatoes (RTE), which are then not washed	Contaminated Equipment/ Protection from Contamination	39, 44	Cross contamination has occurred with the tomatoes being carried on the apron that had raw chicken wiped on it.
Bare hand contact with tomatoes (RTE) while cutting	Poor Personal Hygiene	9	No bare hand contact with RTE foods.
Non-approved chemical used to wash lettuce	Contaminated Equipment/ Protection from Contamination	27, 28, 42	Only running water or approved produce washes can be used to clean produce.
Sanitizer bucket stored near foods – on food contact surfaces	Contaminated Equipment/ Protection from Contamination	28	To prevent chemical contamination, sanitizer should be stored under the table away from the food.
Potatoes stored on the floor	Protection from Contamination	15, 39, 47	Food should be stored at least 6 inches off the floor to prevent contamination and allow for proper cleaning of the floor.
Bag labeled TOMS breaks, tomatoes spill on floor	Food from Unsafe Source	11, 13, 37	Food contaminated by falling on the floor. Packaging does not contain vendor identification for traceability.

Tomatoes from floor placed into a new bag and relabeled – no traceability	Food from Unsafe Source	11, 13	Food contaminated by falling on the floor. Packaging does not contain vendor identification for traceability.
No inspection at receiving – no temperature or quality checks done	Food from Unsafe Source	11, 12, 13	TCS food is potentially temperature abused and contaminated or tampered with.

**SAY:** From self-inspections, you will be able to determine where there may be a need for more training whether it is working one-on-one with certain employees or doing a full in-service training. We are now going to practice doing a mock health inspection.

**SHOW SLIDE:** *Hands-On Mock Health Inspection*

## ACTIVITY – Mock Health Inspection

**Instructions:** Tell participants to turn in their Participant's Workbook to the **Modeling Best Practices During an Inspection, Scenarios 1A-6B**, and **Food Establishment Inspection Report** handouts. The instructor will review the Modeling Best Practices During an Inspection handout to ensure that the participants understand what is expected of them in a real self-inspection situation. Participants will then break into 6 groups. If the class size is greater than 40 participants, still break them into six groups, but assign half the group to do the A scenarios and the other half to do the B (groups 1-6 or groups 1A, 1B, 2A, 2B, etc. through 6B). Allow extra time to report out. There are six (6) scenarios for the Mock Health Inspection, each with an A and B representing different parts of a kitchen. All groups will rotate through all sections. Before class, the room should have been set up with the large printout of the scenarios and their corresponding pictures. The time allotment for this activity, from the initial explanation in the classroom to the inspections and return to the tables for debriefing, is 75 minutes. Please manage the time well so participants can spend 8-12 minutes per section.

While viewing the scenarios and photos in each section, participants will use the scenario worksheets in their Participant's Workbook to complete the first three columns. In these columns they will

- (1) write out whether the scenario line described is in or out of compliance,
- (2) why it is out of compliance, and
- (3) a corrective action, if needed.

Once the participants have gone through the scenarios and returned to their tables, assign each group one of the scenarios (both A and B for six groups; 1A, 1B, 2A through 6B for 12 groups), and as a group they will complete the last two columns. They will write what line(s) on the **Food Establishment Inspection Report** handout that the scenarios would fall under. In addition, they will indicate which risk factor is involved. Allow 10 minutes for this. Each group will report to the class their scenarios. For their assigned scenario, they are to explain what was IN and OUT of compliance, if OUT of compliance why so, appropriate corrective action(s), the Inspection Report line(s) associated with the violation, and the risk factor involved. Encourage participants to fill in all the scenarios as each table reports.

**Instructor's Note:** Be prepared for questions. If there are any questions that you cannot answer, write down the questions and send it to ICN for further clarification.

**SAY:** Great work! Now we are going to take our knowledge of inspections into the “kitchen.” We will break into six teams. Each team will start out in one of six sections of our staged mock kitchen. While you are in each section, your team will be looking for items in and out of compliance. Each station will have 1-2 photos and scenarios. The scenarios are also in your Participant's Workbook. Please bring your workbooks and pens for this activity.

When conducting self-inspections in your facility, it is important to follow all food safety protocols and model best practices. Since today we will be using a mock kitchen, we will not be wearing hairnets and gloves. However, when you perform a self-inspection in your own kitchen, it is important to set an example for others. Please turn to the **Modeling Best Practices During an Inspection** handout in your Participant's Workbook. You can see that setting a good example includes:

- washing hands when entering the food preparation, service, and storage areas at the beginning of the inspection and after engaging in any activities that might contaminate your hands, and
- wearing hairnet/hair restraints correctly and at all times while in the food preparation, service, and storage areas.

**DO:** Instructor – demonstrate how to wear a hairnet. \*Ensure that all hair is contained in the hairnet, including bangs. Demonstrate how to properly wear the gloves.

**SAY:** Avoid touching ready-to-eat food with your bare hands. Please wear gloves properly. Wash your hands before putting them on and replace them as they become contaminated or torn. Also, avoid contaminating cleaned and sanitized food contact surfaces with unclean hands, unclean gloves, or your inspection equipment. This prevents the spread of microorganisms and allergens. If you have an infected cut or wound on your hands, please wear a bandage and glove at all times.

It is important to use a thermometer during your self inspection. Wash, rinse, and sanitize your thermometer probe at the start of the inspection and between taking temperatures of each food. This is important to prevent spreading pathogens and allergens from one food to another. Just a quick wipe with an alcohol pad is not adequate. If you have reportable symptoms such as diarrhea, vomiting, fever with a sore throat, jaundice, or have been diagnosed with a foodborne illness, you should not enter the food preparation, service, and storage areas. You may be excluded or restricted from work depending on your symptoms.

If you have any specific questions during the inspection, I will be available so please come and find me.



**DO:** Divide the participants into six groups by counting off by six. Point out the six sections (noted by the numbered signs) and assign one team to each section. For trainings containing 40 or more participants, assigned half of each group to A scenarios and half the group to B.

**SAY:** For each section, please complete just the first three columns of your scenario sheets. Indicate if the issues are IN or OUT of compliance, if it is out of compliance – why and the corrective action needed. We will fill in the last two columns after we return to our tables. When it is time to move to the next section, I will (*indicate the sounding device to be used*). When you hear this, please move with your team to the next section. Group 1 will move from section 1 to section 2; group 2 will move from section 2 to section 3, and so on. Group 6 will move from section 6 to section 1. When you have completed all six sections, we will go back to the classroom seating together. You will fill out your **Scenarios 1A-6B** as you walk from section to section. Fill out whether each scenario is in or out of compliance. If it is out of compliance, write an explanation of why it is a violation and the corrective action if one is needed. We will fill in the corresponding line number from the **Food Establishment Inspection Report** and the risk factor after the groups have gone through all the scenarios and returned to our seats.

Okay, let's begin. Please go to your first assigned section and work as a team to review the photos and scenarios. As you go through the scenarios ask yourself:

- Which are IN or OUT of compliance? And WHY?
- What corrective action(s) should be taken?

**Instructor's Note:** The scenarios and their stations are listed in the answer key. The answers refer to the lines on the **Food Establishment Inspection Report** and determine whether the scenario is IN or OUT of compliance.

**ASK:** Are there any questions? Are you ready to begin?

**DO:** Answer any procedural questions. Monitor each group by circulating around the room and checking-in with each team for questions. Answer questions as needed, and ask leading questions to evaluate the thoroughness of the mock inspection. Signal to the teams at specified intervals to move to the next section with the sound device. (Group 1 moves from section 1 to section 2; group 2 moves from section 2 to section 3; etc.) When groups have rotated through all six sections, facilitate moving the participants back to their tables.



## Mock Health Inspection Scenarios Answer Key

### Scenario #1 A – Refrigerator Unit

As you enter the walk-in refrigerator, you observe the following:

	Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1	Exterior and interior thermometers are in place.	IN		No action needed	36	Holding
2	The temperature log documents the unit has been holding food at or below 41 °F each day in the month, with the exception of today. The documented temperature upon arrival this morning was 50 °F. No corrective action is documented and all food is still stored in the refrigerator. The hanging thermometer in the refrigerator currently reads 48 °F.	OUT	It is unsure how long the TCS foods have been in the temperature danger zone.	Discard all TCS foods.	22	Holding
3	In the center of the refrigerator, there is a speed rack full of whole, cooked turkeys. Upon asking a school nutrition employee, it is discovered that these were cooked yesterday, and pulled straight from the oven and put into the walk-in to cool overnight. There is no documentation of cooling temperatures or times.	OUT	Turkeys were not properly cooled before putting them into the fridge.	Discard turkeys. Cannot guarantee safe cooling.	20, 33	Holding

4	On the shelf to the left of the door, there is a milk crate full of apples. According to the same school nutrition employee, these were donated by a local farmer at the farmers market.	OUT	Good Agricultural Practice or GAP documentation is needed for farm-to-school produce to ensure the farm has been verified and follows good food safety practices.	Separate and label apples for traceability. Ensure that the director and manager are aware of the food and that it is documented.	11	Unsafe Source
5	Above the apples, are pre-portioned bowls of pineapple chunks on trays. Each tray is covered with plastic wrap and labeled.	IN		No action needed	15, 23	Contamination and Holding

## Scenario for Area/Station #1 B – Refrigerator Unit

While in the walk-in refrigerator, you also observe the following:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 On a shelf to the right, you observe a tray of portioned salads covered with plastic wrap. There is no label or date. Also on this shelf is an opened package of sliced luncheon meat. There is no label or date.	OUT	Food should be properly labeled, dated, and covered.	Cover lunch meat, label and date all food. Check with production records.	15, 23	Holding and Contamination
2 On the bottom shelf, there is a deep pan containing several packages of raw ground beef being thawed.	IN		No action needed	15	Contamination
		IN vs OUT depending on what is stored above this	If raw foods with a higher cooking temp are stored above this (e.g. raw poultry), it could lead to the beef being contaminated.	35	Holding
3 On the bottom shelf, the staff are storing their lunches brought from home. One diabetic school nutrition employee also stores her insulin here.	OUT	Personal food and medicine should not be stored near production food.	Place medicine in a labeled and sealable container. If possible, store meds and personal foods in a separate refrigerator; otherwise, it should be placed in a designated area in the refrigerator where it cannot contaminate production food.	15, 28, 39	Contamination

4	On the floor in the back, there is a wooden pallet.	OUT	Palettes are not a cleanable food contact surface.	Organize food onto shelves that are cleanable and at least 6 inches off the floor.	47	Contamination
5	On top of the pallet, there is a chest of food left over from the booster club's weekend ballgame sales.	OUT	Food is not from an approved source.	Food should be disposed of, and the booster club should be contacted to retrieve their ice chest.	31	Unsafe Source
6	Containers of pasteurized eggs are labeled with an "open" date. No shell eggs observed.	IN		No action needed	30	Holding

## Scenario for Area #2 A – Dry Storage

You are now in the dry storage area. There you see:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 Cans have a “receive” date written on the top lid. The cans are loaded onto the shelf with the oldest date in front.	IN		No action needed	23	Holding
2 Several cans of peaches have large dents.	OUT	Dented cans have a high chance of spoilage and growing pathogens.	Discard dented cans and record them on a damaged and discarded product log.	13	Unsafe Source
3 One can in the rack has no label.	OUT	You cannot ensure what is inside the can or how long it has been there.	Discard the can and record it on a damaged and discarded product log.	37	Unsafe Source
4 On the back corner shelf, there is a box of cereal with a hole gnawed on the side. On the floor below the box, mouse droppings are observed.	OUT	These are signs of pests.	Discard the cereal. Call a pest control service to exterminate mice.	38	Contamination
5 All foods are stored 6 inches off the floor.	IN		No action needed	15, 39	Contamination
6 There is a box of oranges. A school nutrition employee said that they will be using these to make fresh-squeezed juice for sale in the cafeteria.	OUT	Commercially produced orange juice is pasteurized to ensure pathogens are killed. Fresh-squeezed orange juice runs the risk of contamination. This process requires a pre-approved variance from the health department.	Discuss with manager and use on the line as whole or sliced fruit.	26, 29, 32	Contamination

### Scenario for Area #2 B – Receiving and Chemical Storage Areas

You move to the receiving area, inside the loading dock. You observe this:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 A foodservice distributor unloaded a pallet with boxes of frozen items and left while staff was busy with breakfast service. The receiving temperature log is blank.	OUT	A school nutrition employee should have received the delivery, checked the temperature, and recorded the temperature of the TCS food being received.	If not still frozen solid, call the food distributor and reject the boxes.	12	Holding
2 One box is crushed and wet on one end. Another package feels soft to the touch.	OUT	Food has thawed and is now temperature abused. Contents are possibly damaged.	Call the food distributor and reject the boxes.	12, 13	Holding and Contamination

In the chemical storage room, you see:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 Chemicals for cleaning and sanitizing are on the center shelf, in original containers, and with original labeling.	IN		No action needed	28	Contamination
2 On the shelf above, there are paper and plastic goods, including paper napkins, paper plates, and plastic utensils.	OUT	(Food contact surfaces) Utensils, napkins, and plates should not be stored with the chemicals.	Separate storage areas for chemicals and utensils.	44, 45	Contamination
3 On the wall outside the chemical storage room, there are Safety Data Sheets (SDS) for each chemical on site.	IN		No action needed	28	



4	Only one light bulb working in this area. Lighting is poor.	OUT	Lighting needs to be good enough to see in the room.	Tell manager or director to call maintenance and ensure the lighting is corrected.	56	Contamination
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## Scenario for Area #3 A – Cold Food Preparation

You are moving into the kitchen where lunch foods are being prepared. In the cold food prep area, you observe:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 There is a designated sink for washing vegetables. It is clean with no visible sign of grime or build up.	IN		No action needed	16, 39	Contamination
2 A school nutrition employee is observed washing heads of lettuce.	IN		No action needed	42	Contamination
3 Another school nutrition employee, removing the rind and cutting melon, is observed making frequent trips to the restroom. When asked, the school nutrition employee said she was sick with diarrhea earlier in the morning but was starting to feel better now.	OUT	Employee should have reported her symptoms and should not be handling a RTE food.	Employee should be excluded for 24 hours after the last symptoms. The food she was handling should be discarded and recorded on log. The areas that she worked in should be disinfected. Retrain employee.	3, 4	Personal Hygiene
4 This school nutrition employee is removing the rind and cutting melon without gloves.	OUT	Bare hand contact with RTE foods is not allowed and could lead to hand contamination of food.	The food she was handling should be discarded and recorded on log. Retrain employee.	9	Personal Hygiene
5 The handwashing sink in the cold prep area has hot and cold water, and soap available, but the towel dispenser is empty.	OUT	Handwashing sinks should be fully stocked at all times.	Refill towel dispenser.	10	Personal Hygiene
6 Observed cut melon, luncheon meat, and liquid eggs date marked for being opened/used for dates over a week ago.	OUT	Food that is out of date cannot be used. (Seven-day shelf life for prepared TCS foods.)	Discard food and record on discarded or damaged food log.	23	Holding

## Scenario for Area #3 B – Hot Food Preparation

You continue into the kitchen where hot foods are being prepared. You observe:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 A school nutrition employee has two large pots on the stove. One with ground turkey meat sauce and one with water boiling for noodles. You observe the school nutrition employee taking the temperature of the meat sauce and writing the temperature down. The temperature reads 165 °F.	IN		No action needed	18	Cooking
2 You then observe the school nutrition employee tasting the sauce right from the stirring spoon which is not replaced or discarded.	OUT	This is not the proper way to taste food, and now the food has been contaminated.	Discard sauce and retrain employee.	6	Personal Hygiene
3 The school nutrition employee is wearing a heavily soiled apron and is without a hairnet.	OUT	This is a potential for cross contamination from the apron and physical contamination from the hair.	Have the employee change their apron and put on a hair restraint. Retrain employee.	40	Contamination
4 In the hot holding cabinet to the left, there are several pans of broccoli – the temperature is measured at 125 °F.	OUT	Hot TCS food should be held at 135 °F or above to keep out of the temperature danger zone.	Determine length of time and reheat to 165 °F for 15 seconds and then hold above 135 °F.	21, 34	Holding
5 On the prep table, there is an unlabeled spray bottle containing a clear liquid.	OUT	Without a label, it is not clear what chemical is in the container so it cannot be guaranteed that it is food safe.	Discard liquid and correctly label all future bottles/chemicals.	28	Contamination

## Scenario for Area #4 A – Food Serving Areas

You are now standing behind the serving line, where you see:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 As each pan of food is replaced, temperatures are taken and documented.	IN		No action needed	21, 22	Holding
2 There is a handwashing sink immediately beside the serving line. As hands are washed before service, you observe water splashing onto the serving line and, occasionally, on the food.	OUT	Splash back from the sink contains the pathogens washed from hands and is now getting on the food and food contact surfaces.	Discard any food that has been splashed. Clean and sanitize the serving line. Call maintenance to fix the sink and install a barrier to prevent splashing.	39	Contamination
3 School nutrition employees on the serving line are wearing gloves and using utensils to serve.	IN		No action needed	9	Personal Hygiene
4 When not serving, the in-use utensils are placed on damp towels in front of the serving pan.	OUT	Storing utensils this way provides an opportunity for contamination.	In-use utensils should be stored in the food; stored in warm water that is 135 °F or higher; or cleaned, sanitized, and air-dried.	43	Contamination

### Scenario for Area #4 B – Food Serving Areas

You are now standing behind the serving line, where you see:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 Each school nutrition employee is wearing a clean apron and hair restraint.	IN		No action needed	40	Personal Hygiene
2 As pans are emptied, they are stacked onto the handwashing sink.	OUT	The handwashing sink should be accessible for handwashing and should not have dishes in it.	Move pans to dish area, and wash, clean, and sanitize the sink.	10	Personal Hygiene
3 When the line is slow, the cashier also serves food, wearing the same gloves for both tasks.	OUT	Gloves should not be worn while handling money. Gloves should also be changed once they are contaminated.	Wash hands, change gloves, and retrain employee.	46	Contamination and Personal Hygiene
4 A school nutrition employee stored a covered drink with straw on top of the serving line sneeze guard.	OUT	Employee drinks and foods should be consumed in a designated area away from food preparation, service, and storage areas.	Move drink to designated area.	6, 39	Personal Hygiene and Contamination

## Scenario for Area #5 A – Manual and Mechanical Warewashing Areas

You enter the dishroom and see:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 Clean equipment and utensils are stored on a rack just beside the scraping and rinsing area of the three-compartment sink.	OUT	This allows for the possibility of cross contamination.	Move the rack and rewash equipment and utensils.	44	Contamination
2 The three-compartment sink is set up. Chemical sanitizer is used. An employee demonstrated using the available chemical test strips and tested the sanitizer solution.	IN		No action needed	48	Contamination
3 In the rinsing area of the triple sink, the spray nozzle spring is stretched, causing the nozzle to fall below the flood rim of the sink.	OUT	The nozzle creates a cross connection which could lead to backflow.	Call maintenance to fix the nozzle.	51	Contamination
4 As students return trays, whole, uneaten pieces of fruit and unopened cartons of milk are pulled off the tray and saved, to be rewashed and re-served later.	OUT	If your school does not have a food recovery program, food must be discarded as safety cannot be ensured. The milk (a TCS food) could also be temperature abused, and both foods could be tampered with.	Follow procedures for food recovery program as applicable, otherwise discard. Do not reuse food for school.	17, 22	Unsafe Source and Holding

## Scenario for Area #5 B – Manual and Mechanical Warewashing Areas

You enter the dishroom and see:

	Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1	Observed pans stored as clean with food and food particles stuck to them and were stored/stacked wet.	OUT	Pans were not properly cleaned or air dried.	Rewash the pans and allow to thoroughly air dry.	16, 44	Contamination
2	The mechanical dishmachine final rinse water temperature is registering 180 °F at the manifold, and observed dishmachine was sanitizing as evidenced by thermolabel.	IN		No action needed	16	Contamination
3	Behind/under the dishmachine were several dead cockroaches.	OUT	This is a sign of a pest problem.	Call pest control.	38	Contamination
4	On the rack above stored, clean pans and utensils were containers of labeled dishwasher soap and sanitizer.	OUT	This is a possibility of chemical contamination.	Move the chemicals. Dish soap and other chemicals cannot be stored above clean utensils.	28	Contamination

## Scenario for Area #6 A – Handsinks and Main Kitchen

In the main kitchen, you observe the following:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 A school nutrition employee removed garbage from the can, replaced the liner, and resumed food handling tasks.	OUT	The employee cross contaminated the food by not properly washing hands after handling garbage.	Food that the employee touched should be discarded. Employee should have washed their hands after handling garbage and before touching food. Retrain employee.	8	Personal Hygiene
2 Ice machine cleaning log indicates last cleaning was over 2 months ago. Pink slime build-up is observed.	OUT	Pink slime is a sign of an unclean ice machine. Ice machines should be cleaned on a regular basis as stated by the manufacturer.	Melt the ice, then wash, rinse, and sanitize the machine. After air drying allow the ice machine to refill.	16	Contamination
3 Ice scoop is stored directly on top of the ice machine.	OUT	This allows for physical contamination from dust and cross contamination from airborne particles.	Scoop must be stored in a covered container or other approved manner, and washed, rinsed, and sanitized at appropriate intervals.	16	Contamination
4 On a cart near the food prep areas, there are three buckets labeled for washing, rinsing, and sanitizing food contact surfaces. The sanitizer solution is at the correct concentration, and all wiping cloths are stored in the solutions.	IN		No action needed	28, 41	Contamination



## Scenario for Area #6 B – Handsinks and Main Kitchen

In the main kitchen, you observe the following:

Scenario	In/Out	Why Out of Compliance?	Corrective Action	Line #	Risk Factor
1 A can opener, not in use, has a build-up of dirt on the cutting blade.	OUT	Unclean can openers harbor food particles that allow pathogens to grow. These pathogens can be transferred to food once a can is opened.	Wash the can opener. Ensure that it is washed after each use or at 4-hour intervals if in constant use.	16	Contamination
2 In the milk cooler, crates of milk are positioned with the earliest 'sell by' dates in the front.	IN		No action needed	23	Holding
3 On the wall, there are Safety Data Sheets (SDS) for each chemical on site.	IN		No action needed	28	
4 There is grease and condensation build-up on the walls. The hood system does not appear to be in proper working order.	OUT	Potential for cross contamination and physical contamination from grease and condensation. Also a safety hazard with malfunctioning hood vents.	Call maintenance and clean the walls.	49, 56	Contamination



**SAY:** Okay teams, let's return to your tables and stay with your assigned groups. While you were performing your mock inspection, you were to complete the first three columns of your scenario sheets. Now I will give each team a scenario. Together, you will complete the last two columns on your scenario sheets. First, find the line number(s) on the **Food Establishment Inspection Report** that correspond to your observations. Then, indicate to which Foodborne Illness Risk Factor this observation relates. You will have 10 minutes as a group to complete your scenario and to fill in any remaining parts of the scenarios. As you finish, pick a spokesperson for your team.

**DO:** Now or after class, make sure to retrieve toolkit items and props to return to ICN in the trainers toolkit. Have the teams remain together. Give each team a scenario (1-6 for six groups, 1A-6B for 12 groups) to focus on as they return to their classroom seating. The groups are to complete the last two columns by identifying the risk factor for each IN or OUT observation and the corresponding line number(s) from the **Food Establishment Inspection Report**.

**DO:** Monitor the time while circulating around the classroom to assist participants and teams as needed.

**Instructor's Note:** The allotted time for teams to complete their scenario sheets is 10 minutes and to debrief is 30 minutes. Please facilitate and carefully manage the discussion to allow each team 5 minutes of report-in time for six groups, and 2-3 minutes for 12 groups.

**SAY:** Let's review your findings. Team #1, share the OUT of compliance observations you made in scenario 1A/B.

**DO:** Allow Team #1 to share 1-2 of their observations. Sum up and clarify their findings related to the risk factor and best practices in preventing foodborne illness outbreaks. Continue this process to allow each team time to report in as follows:

- Team #2 – Share the OUT of compliance observations you made in scenario 2 A/B.
- Team #3 – Share the OUT of compliance observations you made in scenario 3 A/B.
- Team #4 – Share the OUT of compliance observations you made in scenario 4 A/B.
- Team #5 – Share the OUT of compliance observations you made in scenario 5 A/B.
- Team #6 – Share the OUT of compliance observations you made in scenario 6 A/B.

**SAY:** All of the scenarios, an explanation of the violations, the associated risk factors, and the correct line items are provided in your workbook's appendix in the **Mock Health Inspection Scenarios Answer Key**.

**ASK:** What risk factor-related issues have you seen in your kitchen? What changes did you make to correct these issues? Where would you score that risk?

**DO:** Based on available time, allow 1-2 participants to share. Sum up their comments related to the risk factor and best practices in preventing foodborne illness outbreaks. Verify the answer where the observations were scored and clarify if needed.

## ACTIVITY – Circle of Reflection

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**Instructions:** Tell the participants to create a Circle of Reflection. They will use 3 x 5 note cards and write one thing they learned or reflected upon on each card. They can use as many cards as they need. They will then form a double (one inside and one outside), and take time to share their reflections with each other.

**SAY:** We are going to create a Circle of Reflection. In front of you are 3 x 5 note cards. Write one thing you learned or reflected upon on each card. Use as many cards as you need.

**DO:** Give the participants 5 minutes to complete this activity. When participants have completed this, have them count off by “2”s.

**SAY:** Everyone is to take their cards with them and stand up. Have the “1”s form a circle in an area of the room. Then have them take two steps in to tighten up the circle. Have the “2”s form a circle around them – on the outside of the circle of “1”s. Then have the inner circle walk in one direction in a circle while the outer circle walks in the opposite direction. When I ring the bell (or blow a whistle or clap my hands), everyone stops and faces the person opposite them. Now, share what you have written on one of your cards with the other person. And end by giving them a High Five!

**DO:** Repeat the walk in the circle 2 or 3 times (depending on the time.)

**SAY:** Return to your tables. Great job everyone. I hope you have learned new skills to take back to your school nutrition operation and will use them as you conduct your own self-inspections. We have provided in the appendix a copy of the **Food Safety Check List** that is designed for school nutrition programs. You may choose to adapt and use this form for your own self-inspections in your facility. Remember, ideally you should be inspecting schools at least once a month. It is important to look at the data on the reports left by our environmental health specialist and on our own self-inspection forms. Look for specific trends in data, create and apply corrective actions, and identify training needs. Consider what actions need to be taken to address the risk factors and prevent foodborne illness in your school. Our objectives today were to:

- explain why health inspections are conducted at least twice a year in schools,
- explain the role of periodic inspections and self-inspections to enhance the effectiveness of food safety management programs,
- identify risk-based food safety practices that should be evaluated in a school nutrition operation, and
- conduct a risk-based inspection.

Let's see what you have learned. I will hand you the Post-Assessment. Please make sure to put the same identifier that you used for the Pre-Assessment in the top right corner.

**DO:** Allow the class 5 minutes to complete the Post-Assessment. After all participants are done, review the questions and answers as a group, clarify any missed points, and answer questions to the best of your ability. If there are questions you cannot answer, please refer participants to the ICN and/or resource list provided in the Participant's Workbook.

**SHOW SLIDE:** *Institute of Child Nutrition*

**SAY:** Thank you for attending today's training. The Institute of Child Nutrition partners with USDA's Food and Nutrition Service (FNS) to develop and support training events like our session today. We would like your feedback on this training program.

**DO:** Provide participants the training evaluation form. Make sure all participants have signed the Attendee Roster. Provide attendees a Certificate of Attendance.

**POST CLASS:**

***Instructor's Note:*** Retrieve all props and toolkit items, attendee rosters, pre/post-assessments, and evaluation forms to return to ICN per instructions provided. Check Preparation Checklist to make sure all supplies are recovered.



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- Annex 5 - Conducting Risk-based Inspections
- Annex 7 - Model Forms, Guides, and Other Aids

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