

Clear as Day
Clear as Mud



Meanwhile at an unsuspecting restaurant.....
I speak “inspector”

“I speak *INSPECTOR*” Video





Clear as Day?

DOH
FBI
RISK
HEP A
PIC
EHP
CFPM
CONTROL
RIR
RCP
TEMPED
PROBED
TCS

OUT
ROP
HACCP
MAP
SSOPs
COOL
P
PF
OOB
PUBLIC PORTAL
CA
VD
RIR

NONC
GRP
ASEPTIC
RETORT
TRDs
RETAIL
SPA
PC
PA LETTER
AFDO
SME
PMO
PC

OMG!



CLEAR AS MUD

Course Facilitator

Deanna Copeland

Clear as Day or Clear as Mud?

- Jargon is **CONFUSING!** Clouds the message
- Acronyms are only good if you know them
- What **MESSAGE** are your words painting?

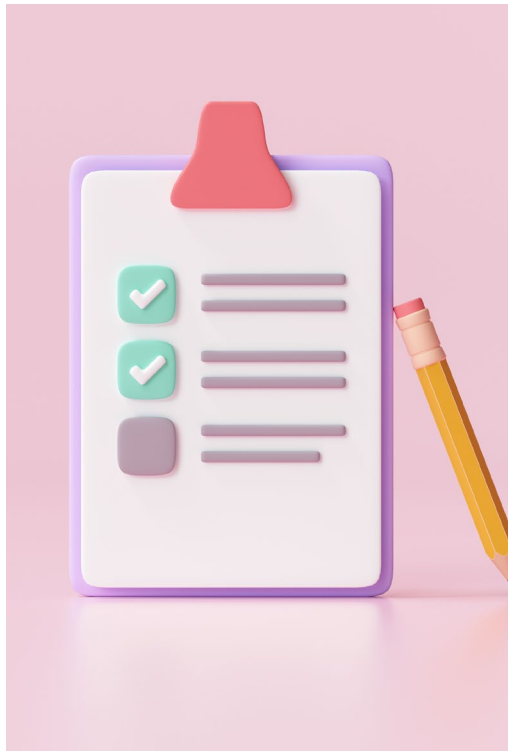




Objectives

- Understand the components of a great citation/violation **enhancement**
- Write **enhancements** in a clear, concise, factual, and responsible statement
- Verbal Communication critical for compliance

The Enhancement



- A regulatory note, statement, remark, in your own words
- Clearly states what was observed
- A concise statement
- Includes the facts
- Provides responsibility - how public health was protected (when applicable)

POLL QUESTION



What components should be part of an enhancement?
(select all that apply)

- A. Where the problem was observed**
- B. Just the facts**
- C. Who was involved in the violation**
- D. The name of the Person in Charge**
- E. Corrective Actions**
- F. The time of day**



Enhancement Components

Clear

Concise

Factual

Responsible

Creates a mental image

State corrective actions taken (as necessary)



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Old dried food residue was observed on the spoon at the display for self-service boiled peanuts. A clean utensil was provided. The dirty utensil was removed and placed in the ware wash sink.

Clear? Concise? Factual? Responsible?

Food prep area: cornbread stored in oven had mold-like build up on it. COS: owner voluntarily discarded.

Observed large purse under prep table in the dessert room, also observed open sodas stored inside of ice machine.



Clear and Concise



Clear: The act of making a statement definite, or distinct. Unambiguous, simply stated.



Concise: Brief in form but comprehensive in scope, succinct.



**Meat department
area; live
crawling roaches
throughout
location.**

Factual

Factual:
restricted
to or based
on fact

Utensils were not provided for customers at self-serve bakery case. A clean utensil must be provided for customer use to protect food from contamination.



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Responsible



- Independent decision-making or involving important duties
- Having an obligation to do something
- Corrective actions taken, COS



Get Rid of the Fluff and Stuff

Employee has **no sanitizer** in warewash sink sanitizing compartment, container for sanitizer dispenser is **empty** and employees are **using equipment** after it has come out designated sanitizer sink. **Sanitizer dispenser** was **reloaded** with a new container of **sanitizer** and ware washing **was resumed.**

No sanitizer in container at the ware wash sink.
Observed employees using **unsanitized** equipment.
Sanitizer dispenser **reloaded** with sanitizer and **unsanitized** equipment was removed from use.



Trim It Down

Walk-in cooler- raw egg yolks on an uncovered plate found **stored on top of white cheese** inside of the walk-in cooler. To correct the violation, the **egg yolks** were **moved to an appropriate location** inside the walk-in cooler on a shelf below the cheese.

Walk-in cooler: Raw egg yolks stored above cheese. Corrective Action: Egg yolks moved to an appropriate location.



POLL QUESTION



Chicken recently prepared not cooled to 41°F or below prior to placing product into a retail display case.

(select all that apply)

- A. Clear**
- B. Concise**
- C. Factual**
- D. Responsible**
- E. All of the Above**

POLL QUESTION



Chicken breast cooked 6 hours prior was not cooled to 41°F or below prior to packaging product to store in retail display case. The chicken was discarded. Cool foods rapidly to 70°F within 2 hours and then to 41°F or below within 4 hours to maintain safety.

(select all that apply)

- A. Clear**
- B. Concise**
- C. Factual**
- D. Responsible**
- E. All of the Above**

The Ideal *Enhancement*



- Objective and factual
- Impartial and unbiased
- Contain no personal views or opinions
- **Free Jargon** (Temped, Probed, Matrix, etc.)
- **Acronyms** (PIC, FBI, RCP, BHC, DOH, etc.)
- Provides corrective actions

SO WHAT?!

- **Your words make a big impact**
- **Summary of violation**
- **Provides historical chain of events**
- **Communicate out of compliance issues to the food establishment**



Corrective Action

Action taken by
establishment

To protect public
health

To stop the
objectionable
condition

Based on valid
practices/science

CLOSE THE LOOP!
Finish what you
started



CLOSE THE LOOP!



Internal temperature of chicken wings on a rack by the oven was 52°F.

Corrective Action: products were moved to proper refrigeration.

or

Corrective Action: Wings relocated to reach in cooler as the food was above 41°F less than 4 hours.



Perception = Reality

- What you don't write is important
- Use your wit - don't OMIT
- What the owner / public reads is perceived to be the final outcome

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CLEAR AS DAY!



Be Sure To...

Emphasize the So What!?

Close the loop!

Finish what you started

**Keep it Simple your audience does
not speak food safety**

The Audience



- **Legal staff (enforcement, lawyers, courts)**
- **Regulatory Partners (FDA, DOH, others)**
- **Industry Partners and Associations**
- **Media**
- **Consumer Groups**

Public Access

EXCEPTION



Florida Department of Agriculture and Consumer Services

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Nicole "Nikki" Fried
Commissioner

Food Safety

- [Apply for a Food Permit](#)
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- [File a Complaint About a Food Product or Food Business](#)
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Division of Food Safety

Important Notice for Existing Food Establishments

The Florida Department of Agriculture and Consumer Services is responsible for assuring the public of a safe, wholesome food supply through permitting and inspection of food establishments, inspection of food products, and performance of laboratory analysis on a variety of food products sold or prepared. The Division of Food Safety provides a comprehensive program to monitor food from farm gate through processing and distribution to the point of purchase.

- **INSPECTION REPORTS online**
- **Transparency**
- **Perception**

POLL QUESTION



Does your agency post inspection reports online?

A. YES

B. NO

THE JARGON TRAP

And Scary Antonyms too!

PROBED

To physically explore or examine (something) with the hands or an instrument



PROBED

Observed beef empanadas and beef patties between 110*(f) - 121*(f) when checked with a **calibrated probe thermometer** inside hot case.



OR

Probes indicate rice, soffrita, and coleslaw at 46 and 47 degrees f at display shelf.



TEMPED



OR

TEMPERATURE



*Pot of chili cooling from day before in walk in cooler **temped** at 72°F. COS-Product was voluntarily destroyed.*

Internal temperature taken with a probe thermometer of pot of chili cooling from day before in walk in was 72°F. Corrective Action: Product was voluntarily destroyed.

Acronyms

Observed **CC** in **WIC**
The **PIC** was not **CFM**
FBI Investigation
BHC with **TCS**
HACCP for **ROP**

Clear & Concise ≠ Abbreviated

***ENHANCEMENT* RECAP**

CLEAR & CONCISE

IMPARTIAL/UNBIASED

TRIM IT DOWN

NO OPINONS

FACTUAL

OBJECTIVE

RESPONSIBLE

FREE OF JARGON

NO FLUFF AND STUFF

K.I.S.S.

CLOSE THE LOOP!

“ A picture is worth a thousand words, but it's the words that really tell the story.”

Don Your Gloves

Clear as Day

Clear as Mud



POLL QUESTION



Employee observed rinsing hands with only water and then drying hands on apron and pants before returning to cutting bread.

- A. CLEAR as MUD
- B. CLEAR as DAY

POLL QUESTION



Employee observed rinsing hands with only water and then drying hands on apron and pants before returning to cutting bread.

Corrective Action: Spoke to owner about proper handwashing. Bread was discarded

A. CLEAR as MUD

B. CLEAR as DAY



Verbal Communication

- Not just written inspection reports
- Understanding what we say
- Terminology
- Jargon
- Acronyms
- Culture, education, experience
- Familiarity

Familiarity

Environmental Manager
David Marshall of the
Florida Department of
Agriculture and Consumer
Services Retail Food
Program

- Mr. David Marshall
 - David Marshall
 - David
 - Dave



Dave



Familiarity

Clostridium botulinum

- *C. botulinum*
 - *C. Bot*
 - *Bot*

- Botulism

- Potentially deadly toxin



An underwater photograph showing a diver in the background and a large, diverse coral reef in the foreground. A black and green underwater camera or light housing is visible on the left side of the frame. The water is clear and blue.

Clostridium botulinum

- We say “**C. bot**”
- Do they hear “**Sea Bot**?”

Communication Mishaps

A close-up photograph of a document titled "Health Insurance Policy". The title is written in a large, bold, serif font and is underlined with a decorative flourish. A magnifying glass is positioned over the left side of the text, highlighting the words "Insurance" and "Policy". The background shows a blurred form with fields for "Patient's Name" and "Your Name".

**Health
Insurance
Policy**

Employee Illness Policy

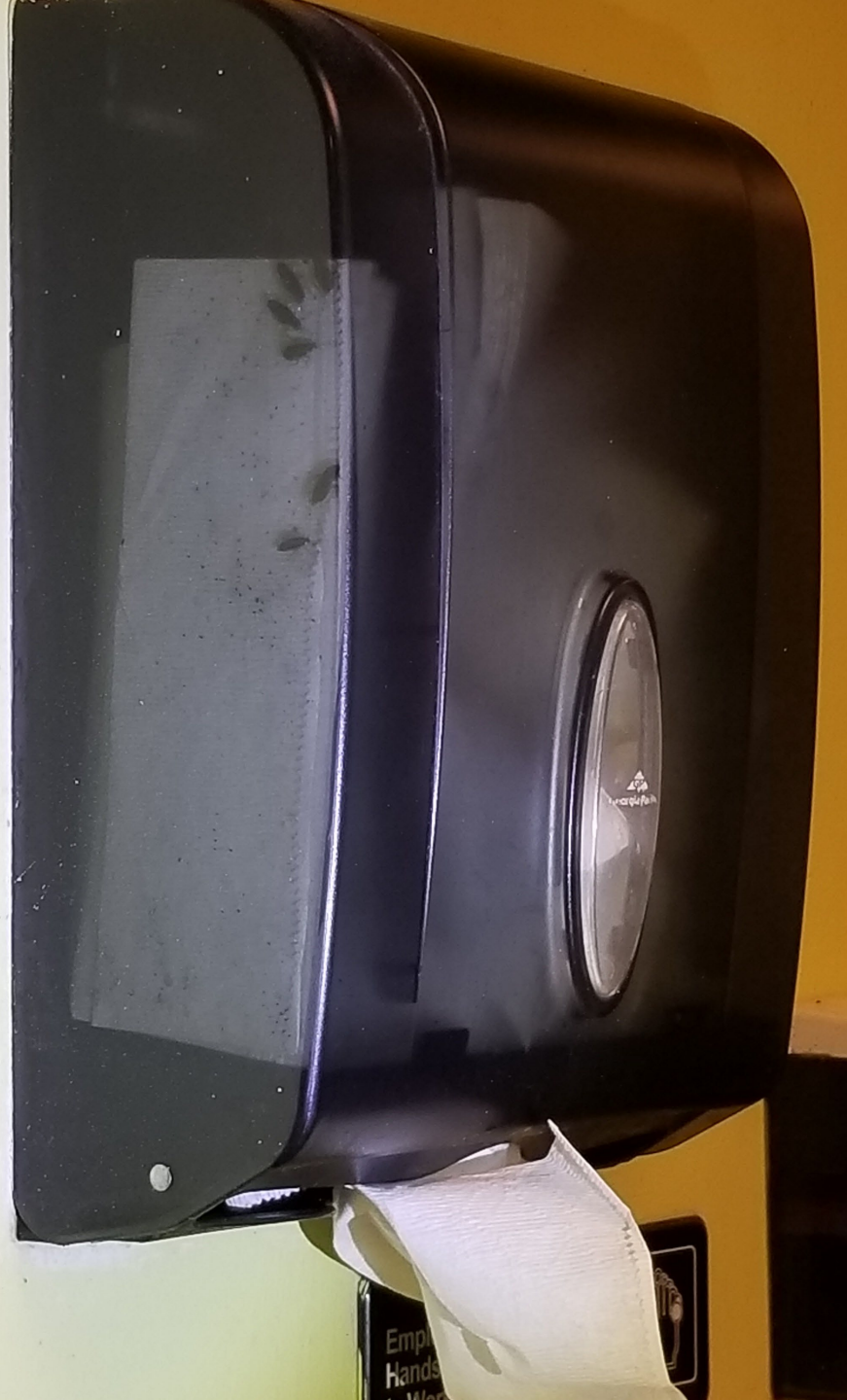


Mumbo Jumbo



Pocket Story





Emp
Hand
Wor

Objectives RECAP

- Understand the components of a great citation enhancement
- Write enhancements in a clear, concise, factual, and responsible statement
- Verbal Communication critical for compliance





QUESTIONS?

Thanks for attending!