

QUESTIONS AND ANSWERS

Inspector Boot Camp 1.24.2024

Risk Based Inspections

Q: If a facility is receiving boxed sandwiches/salads from a sister facility (same owner) and selling them packaged in a self-serve fridge, what labeling do these items need?

A: If the facility is holding the sandwiches for more than 24 hours, they'll need to date mark each package. Labeling laws for items such as ingredients and item weight can vary by state. Please review your applicable law. You can also review this AFDO resource on labeling.

<https://www.afdo.org/resources/labeling-laws-and-guidance/>

Q: I have a handful of places that only freeze (don't cook or prep anything) while I'm in the kitchen. How should that be handled?

A: Take note of when your inspections are occurring and attempt to inspect at a different time. If your agency allows it, this may require you to inspect outside of your normal work hours. During an inspection without any food preparation activity, you can ask about their processing steps after your menu review. If something seems questionable during that discussion, let them know of your concerns and how to avoid potential risks. The goal is to educate as much as you can, so that they can practice safe food handling when they are preparing food. Be sure to ask them if they have any questions on the requirements.

Q: Cold holding for dressings that say refrigerate after opening; is this statement for safety or quality? Also, if its temp abused but there are many preservative ingredients, how do we go about it?

A: Commercially prepared and packaged dressings are most often not TCS foods, so the statement is a quality recommendation. <https://www.foodsafety.gov/keep-food-safe/foodkeeper-app> Join us for Advanced Boot Camp on February 21, 2024 where we will be discussing "TCS or Not"

<https://www.afdo.org/events/advanced-inspector-boot-camp-0221/>

Q: I've run into quite a few establishments that, when I test sanitizer in dish machine or sink or buckets, it doesn't show proper strength. Pretty static event, but is it high risk or not?

A: In relation to all the activities occurring in the kitchen, it is on the lower end of the relative risk spectrum. You might choose to address higher relative risk situations first. This does not mean to ignore the issue. You should discuss immediate corrective actions, document the violation, and give a timeframe for correction.

Q: What are GRP violations that might be considered higher risk?

A: Items considered Good Retail Practices (GRPs) can be found in Guide 3-B [page 7-42] in Annex 7 of the FDA model food code. <https://www.fda.gov/media/164194/download?attachment>. GRPs that are Priority items would be higher relative risk than GRPs that are Priority foundation or Core items.

Q: How do you handle food establishments that do not wear gloves when preparing foods?

A: There are various methods to prevent bare hand contact with ready-eat-food. AFDO has a list of resources for regulators to use- you may want to check this out!

https://www.afdo.org/resources_category/bare-hand-contact/ You can also use *Annex 5 Risk-Based Inspections* [page 5-23] <https://www.fda.gov/media/164194/download?attachment> as a resource that discusses questions an inspector should ask before determining the proper corrective action.

Equipment.....What An Inspector Needs To Know

Q: How do you cite if the floor drains from the tilt skillet are soiled?

A: It is always best to refer to your agency's marking instructions if they provide it.

You can also reference FDA Annex 7 Guide 3-B of the FDA model food code.

<https://www.fda.gov/media/164194/download?attachment>. I would start with 6-502.12

Q: What about air pumps for Peking duck? Is this equipment approved, and how can it be cleaned?

A: There are many styles of air pumps. In preparation of Peking duck, the pump will touch the raw protein as the air needs to be forced between the skin and the flesh to prepare this specific dish. Can the nozzle be cleaned? Are contaminants retracted back into the pump due to it's functionality? These are things to consider when evaluating the pump. If there is an NSF certified logo, the pump will be acceptable for cleaning, and you would only need to evaluate whether or not they are using food grade oil for lubrication. Check with your agency for specific questions.

Q: WHAT VIOLATION SHOULD AN INSPECTOR BE LOOKING OUT FOR IN A SOUS VIDE COOKING EQUIPMENT - RIGHT TEMPERATURE, AND SEALING?

A: You will need to review their HACCP plan and verify they are following it.

Q: Is there any regulation for not using dry ice for cold holding?

A: No this is not restricted in the FDA Model Food Code. There are risks associated with dry ice. Read more about dry ice

here: <https://www.health.ny.gov/publications/7081/#:~:text=Dry%20ice%20can%20be%20a,and%20in%20some%20cases%2C%20die.>

Q: If the hot hold food has been used, how many times can it be reheated?

A: TCS food if properly handled [proper cooking, reheating, hot holding and cooling] can be reheated as many times as necessary within 7 days. This practice is discouraged due to increased risk of failure and a negative impact on the quality of the food as well.

Q: I usually swipe the test strip under the door when I lift it after the cycle is done, is there a preferred way to test for sanitizer concentrations vs. how Autumn showed us in the video?

A: Both are acceptable ways to test sanitizer level at a warewashing machine.

Q: Does meat equipment require a cleaning maintenance log?

A: The USDA has a rule in effect since December 2015, <https://www.fsis.usda.gov/policy/federal-register-rulemaking/federal-register-rules/records-be-kept-official-establishments>. Get with your agency to determine how they wish for you address this Federal rule.

Q: Is there a temperature requirement for refrigerated rooms? for meat, seafood, produce at grocery stores?

A: The FDA model food code, chapter 4, section 6 covers “frequency” of cleaning. 4-602.11

TEMPERATURE	CLEANING FREQUENCY
5.0°C (41°F) or less	24 hours
>5.0°C - 7.2°C (>41°F - 45°F)	20 hours
>7.2°C - 10.0°C (>45°F - 50°F)	16 hours
>10.0°C - 12.8°C (>50°F - 55°F)	10 hours

(b) The cleaning frequency based on the ambient temperature of the refrigerated room or area is documented in the FOOD ESTABLISHMENT.

Q: Can you cover pizza ovens in future presentations?

A: Pizza oven should be similar to other ovens mentioned in the presentation. If you are wondering about a “pizza brick oven” where the pizza is placed directly on the surface, you should not worry. The high heat present and the product placed (dough) on the surface is a natural deterrent to food safety issues.