



Comment Writing 101

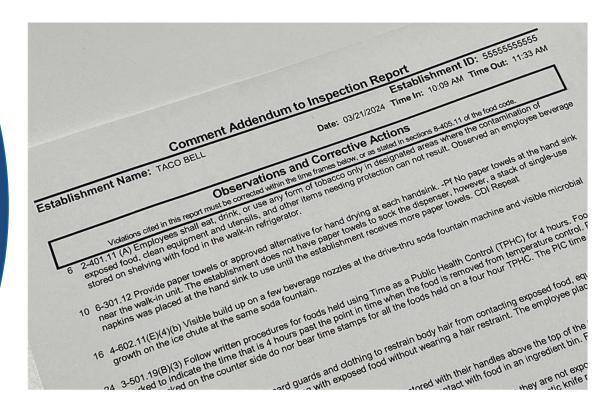
Food Protection & Facilities Branch

2024 Regional Meeting #1

Objectives

- Observations & Comments
- What Would You Write
- Educational Visits
- Permit Actions

Observations & Comments



Key Terms

- Corrected During Inspection (CDI)
- Repeat Violation (R)
- Verification Required (VR)
- In Compliance (IN)
- Out of Compliance (OUT)
- Not Observed (NO)
- Not Applicable (NA)

Supervision			.2652						
1	IN O)	(TN/A	PIC Present, demonstrates knowledge, & performs duties	1		×			
2	X ou	JT N/A	Certified Food Protection Manager	1		0			
E	mploy	yee Heal	lth .2652						
3	IN O)	X†	Management, food & conditional employee; knowledge, responsibilities & reporting	2	1	X	X		
4	X ou	JT	Proper use of reporting, restriction & exclusion	3	1.5	0			Г
5	ш о)	Kr	Procedures for responding to vomiting & diarrheal events	1	0.5	×	Х		

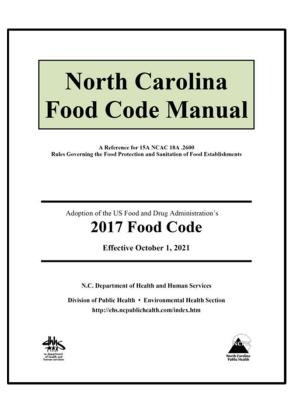
Inspection Report

What is the purpose of the inspection report?

- Document observations and corrective actions
- Educate about food safety issues
- Provide a record of food safety violations

Observations & Comments

- Food Code citation
- Violation (observation)
- Summary of Rule
- Corrective action/follow-up
- Other information



What Should Comments Include?

Per #27 in "QA File Review Instructions":

This item is marked IN/OUT based on the Inspection Form and/or Comment Addendum documentation. Comments for violations provide clear information regarding the observation, a brief description of the citation being violated, and the corrective action. Comments for verification purposes provide clear information regarding correction of the Priority or Priority Foundation violation.

The Four "R's"

- Repair
- Relocate
- Remove
- Replace

Can you write without prepositions?

The Two "P's

- Provide
- Properly

Documenting CDI

DON'T

- "Educated PIC on proper cooling of lasagna"
- "Instructed employee to reheat chili to at least 165°F"
- "Asked PIC to provide hand soap at the kitchen hand sink"

• DO

- "PIC sliced lasagna into smaller pieces and placed on a sheet pan in the walk-in cooler uncovered to continue cooling"
- "Employee reheated chili to 171°F"
- "PIC provided hand soap at the kitchen hand sink"

An inspection report should NOT be...

- College essay
- Thesis for a Master's Degree
- Dissertation for a PhD
- Novel



Example

16) 4-501.114 Manual and Mechanical Warewashing Equipment, Chemical Sanitization - Temperature, pH, Concentration, and Hardness: Quat sanitizer being used to sanitize food contact surfaces at the 3-compartment sink observed to be at a concentration of 0 ppm. A quaternary ammonium compound solution shall: (1) Have a minimum temperature of 24°C (75°F), (2) Have a concentration as specified under § 7-204.11 and as indicated by the manufacturer's use directions included in the labeling, and (3) Be used only in water with 500 MG/L hardness or less or in water having a hardness no greater than specified by the EPA-registered label use instructions. CDI- Sanitizer was re-made and tested at 200 ppm.





What's the Problem?

- Confused reader/loss of focus
- Long periods of time writing reports
- Reduced number of inspections

Examples

- 22) 3-501.16 All TCS foods must be held at 41 F or lower. CDI- discarded.
- 47) 4-205.10 Unapproved equipment. Must be NSF or equal.
- 55) 6-501.11 Replace cracked floor tiles.
 - 6-501.12 Clean floors.

What's the Problem?

- Not enough information provided
- Confused reader
- Causes problems for next inspector

Challenges

- Handwritten reports
- Technology issues
- Canned comments
- Inspection quotas



Goals

- Clearly and accurately document observations and corrective actions
- Avoid comments that are too wordy or confusing to the reader
- Save time and mental energy!





Activity

- 1) Review each picture and observation.
- 2) Write a comment based on the observation provided. Be sure to include the code citation and corrective action (if necessary).
- 3) Be prepared to share your comment with the group!



Employee observed handling ready to eat cooked chicken with their bare hands for a customer order.

3-301.11(B): Food employee observed using their bare hands while chopping fully cooked chicken intended for a salad. Food employees shall use gloves, utensils, or similar barrier to prevent bare hand contact with ready to eat foods.

CDI- Chicken was voluntarily discarded by the employee.

Anything Else?

2-303.11: Food employee observed wearing a watch while handling food. Food employees may not wear jewelry on their arms and hands except for a plain band.



Raw shells eggs were found next to the cookline at 61°F. No TPHC procedures in place. Line cook confirmed eggs have been in this location for 30 minutes.

3-501.16 (B): Raw shell eggs observed being held on the cook line table at 61°F. PIC stated eggs have been stored in this location for 30 minutes. Raw shell eggs shall be held in a refrigerated unit with an ambient air temperature of 45°F or less.

CDI- Eggs relocated to a refrigerated unit with an ambient air temperature of 45°F or less.



Wet areas over the drain field of the sewage disposal system indicate a potential malfunction. No sewage was found to be backing up into the facility.

5-403.11(B): Wet areas over the drain field of the sewage disposal system indicate a potential malfunction. Sewage shall be disposed of using a sewage disposal system that is sized, constructed, maintained, and operated according to Law.

Verification required - REHS will immediately notify On-site Water Protection that there is a potential malfunction. The notification satisfies the 72 hour corrective action time frame.



The food thermometers were found stored in their cases with food residue on the probe.

4-602.11(A)(4): The food thermometer was found stored as clean with food residues from a previous use. The food thermometer shall be cleaned before using or storing.

CDI – PIC cleaned the food thermometer.



PIC cannot verify when the sausage patties were cooked and placed in refrigeration to cool. The sausage patties are 41°F and are to be used for homemade sausage gravy tomorrow morning. All other foods are properly date marked.

3-501.17(A): Cooked sausage patties found stored in refrigeration at 41°F without a date mark. TCS foods held for more than 24 hours shall be date marked for no more than 7 days when held at 41°F or below.

3-501.18 (A)(2): TCS food subject to date marking shall be discarded if found with no date or day.

CDI – PIC voluntarily disposed of the sausage patties.

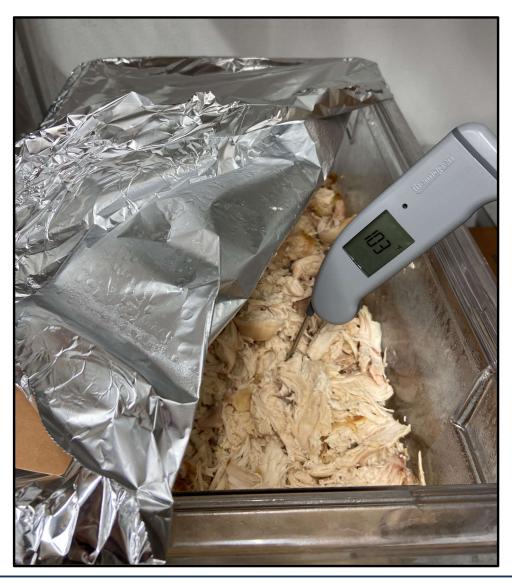


A food employee opens the door of the walk-in cooler with gloved hands to retrieve a bag of lettuce for the sandwich line. The employee returns to the sandwich line, dumps the bag of lettuce in a pan, and resumes making a sandwich.

What Would You Write?

3-304.15(A): Food employee opens the door of the walk-in cooler with gloved hands and resumes working with food. Single-use gloves shall be changed prior to returning to work with food when a change in task occurs and gloves become contaminated.

CDI – PIC had employee remove gloves, wash their hands, and apply new gloves. Employee voluntarily disposed of the sandwich.



Observation

Chicken found cooling in the walk-in cooler at 103°F. The PIC states that this rotisserie chicken was pulled from the hot display at 139°F, deboned, placed in the three-inch plastic container, tightly covered, and placed in the walk-in cooler to cool three hours ago.

What Would You Write?

3-501.14(A): Cooked chicken found cooling in the walk-in cooler for three hours at 103°F. Cooked TCS foods shall cool from 135°F to 70°F within 2 hours and from 135°F to 41°F or less within a total of 6 hours.

CDI – PIC voluntarily discarded cooked chicken.

Anything Else?

3-501.15(A): Cooked chicken found improperly cooling in the walk-in cooler due to the container being tightly covered. Foods in the cooling process can be loosely covered or uncovered to help facilitate proper cooling if protected from overhead contamination.

CDI – PIC voluntarily discarded the cooked chicken.



Observation

The irreversible registering temperature indicator read 147°F when used to check the high-temperature warewashing machine. The "Rinse" temperature gauge on the machine did not move during the final rinse cycle.

What Would You Write?

4-703.11(B): The irreversible registering temperature indicator reads 147°F when cycled through the high temperature warewashing machine. Food contact surfaces and utensils shall be sanitized and achieve a surface temperature of 160°F.

Verification required – REHS will verify that the warewashing machine has been repaired within 72 hours. Use the 3-compartment sink to wash, rinse, and sanitize food contact surfaces and utensils until repaired.

Anything Else?

4-502.11(C): The final rinse temperature gauge on the high temperature warewashing machine is not working properly. Repair or replace.

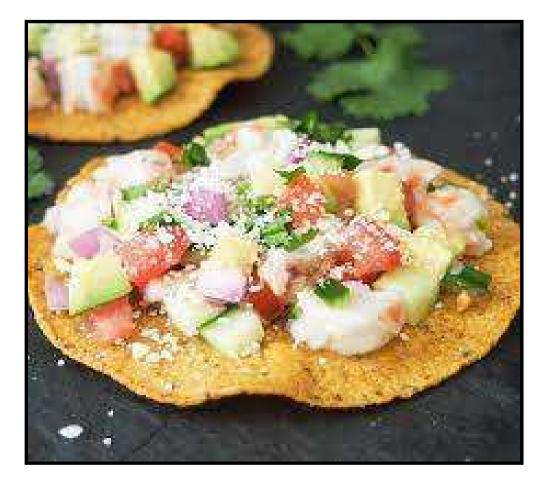


Observation

Flour stored uncovered under the cook line prep table. No raw meat is handled on the prep table above.

What Would You Write?

3-305.11(A)(2): Flour stored uncovered under the cook line prep table. Food shall be protected from splash, dust, and other contamination during storage.



Tostada de Ceviche "shrimp cooked in lemon juice"

Observation

Raw shrimp arrive frozen from supplier. Shrimp is thawed and placed in lemon juice to marinate for two days. Ceviche is assembled and then served to customers. PIC has no idea what a parasite destruction letter is and has never been asked to provide one. An approved consumer advisory is provided.

What Would You Write?

3-402.12: Raw shrimp found marinating in lemon juice for 2 days and being served undercooked. Verification of parasite destruction not available. Raw shrimp shall be frozen to specified time and temperature parameters or a written agreement or statement from the supplier stating that the shrimp has been frozen to destroy parasites shall be provided.

CDI- Shrimp will be fully cooked to a minimum 145°F until parasite destruction can be verified.

Documenting Temperature Observations

- Mark "IN" or "OUT" on first page of report
- Document temperature in the chart
 - Receiving
 - Cooking
 - Reheating
 - Cooling*
 - Plant food cooked for hot holding
 - Holding

Temperature Observations							
Item/Location	Temp	Item/Location	Temp	Item/Location	Temp		
Gravy/cooling (10:15)	109 F	Chili/2-door reach-in	40 F				
Gravy/cooling (10:51)	83 F	Slaw/2-door reach-in	41 F				
Grits/hot hold	151 F	Baked potatoes/walk-in	39 F				
Home fries/final	194 F	Pasta salad/walk-in	40 F				
Sausage patty/final cook	167 F	Milk/1-door reach-in	41 F				
Sausage link/final cook	177 F	Cottage cheese/1-door reach-in	41 F				
Raw chicken/delivery	38 F	Pancake mix/ice bath	38 F				
Veg soup/reheat	198 F						
Ham/prep ref	41 F	Hot water/hand sink	111 F				
Sliced cheese/prep ref	41 F	Hot water/3-comp	123 F				



- Must follow language in the Session Law
 - Review priority violations from previous three inspections
 - Review public health risk factors
 - Review of any required HACCP plan
- "Educational Visit" activity type added to inspection form and comment addendum in EIDS

- Reviewing previous Priority items
 - Document on comment addendum
 - Provide a simple narrative of what was discussed
- No Priority items marked on previous inspections
 - Document on comment addendum
 - In-service training may be provided on any risk factor
- Visits don't have to be unannounced!

Review required HACCP plans

- Copy of HACCP plan, approval, and required record-keeping
- HACCP verification documented on the State's HACCP verification form or other applicable form
- Include a comment addendum with educational visit activity documented

Comments may include

- Code citations
- Historical information and dates
- Individuals present
- Discussions during the visit
- Documents provided



Observations - Corrective Actions - General Comments		
Discussion held about major violations that can occur in the kitchen and documents were provided.		

Additional Comments

Educational documents provided. Discussed the methods and proper way to store food in walk in, prep units, and in dry storage. Owner has made changes to all and will inform employees on the same education provided during meeting. Dsicussed cleaning of active food processing equipment and utensil such as deli slicer which is required to be cleaned and sanitized every 4 hours form point of use, and also proper cleaning of sauce bottles. Once bottle is severely stained the cleanability decreases and shall be discarded. Concerning the main preparation unit is underneath the hot lamp for orders ready to be served it came to a conclusion that the unit lids need to be installed directly on the food item or have the tops closed between use. Date marking, and cooling were also discussed with new effective methods to have all employees on the same understanding.

Observations - Corrective Actions - General Comments	
Discussed hot holding on steam table and hot bar taken to the Alzheimer's unit. Discussed cleaning floors, walls, and ceiling as well as non-food contact surfaces helps keep pest from multiplying. Discussed date marking or ready to eat, time/temperature control for safety food. Discussed keeping a check on sanitizer in dishmachine, including making sure supply container is not empty.	

8. 2-301.14 - When to Wash. (P) Observed food employee bare hand raw beef, and then begin to work with Ready to eat noodles. Ensure that food employees are properly washing hands after switching from raw meat to ready to eat foods to prevent cross contamination. CDI

PIC reheated noodles to 165F degrees and above and began placed product in freezer to cool.

2-301.14 - When to Wash. (P) Observed food employee handle raw beef then grab ready to eat bread for sandwiches out of the steamer. Ensure that once switching to a new task away from the raw prep station that gloves are removed, hands are washed, and new gloves are applied. Pho Bowl station employee can handle raw meat and prepare Pho Bowls, however once they switch to a different station (Salad, or sandwiches) need to remove gloves and wash hands. Corrected employee discarded bread and washed hands before going back to work. Full points taken next inspection if violation is repeated.

9. 3-301.11 - Preventing Contamination from Hands. (P) Observed food employee remove bread from steamer with one gloved hand one ungloved hand contacting the food directly without any type of barrier. Do not contact exposed ready-to-eat food with bare hands. Use suitable utensils, single-use gloves or dispensing equipment. Corrected bread was discarded, and gloves were placed on hands before

returning to sandwich station.

22. 3-501.16 (A) (2) and (B) Time / Temperature Control for Safety Food, Hot and Cold Holding (P) Observed items in drink cooler (Milk, and Heavy cream) at 48F degrees. These items were just opened and just received earlier today, CDI Unopened containers were placed into walk-in cooler to store cold, EHS recommends to have someone come look at the cooler or stored TCS drink items in a separate cooler. Will return 6/22/2023 to ensure the TCS food are maintained at 41F or below. Improvement from previous inspection points remain the same. 28. 7-207.11 Store labeled, employee medications to prevent contamination. -(P) Observed bottle of medication stored on dry goods storage shelve above ready to eat food items, ensure that toxic materials and medication are stored separately to prevent contamination of dry goods.

Comments: EHS discussed all Priority (P) Violations from the past three inspections, education on handwashing and proper procedures were discussed to reduce exposure of food with contaminations from hands, discussion on when to wash, and also adding some tongs to the raw meet unit, so that hands are not becoming contaminated during preparation process. Also discussed temperature checks of units to ensure that temperatures are holding at the appropriate temperature requirement below 41F degrees. Handouts provided and sent to email.

Educational visit. Round table discussion with Jim Register, Joe Heindl. Discussed compliant procedure for hand washing when washing utensils / equipment. Hand washing required when moving from handling soiled items to handling cleaned items.

Discussed strategy for maintaining food at 41.0 F in detached WIC during summer temperatures. Facility has ice bottles. Suggest food grade

bags filled with ice to aid in temperature maintenance.

Reminded staff that date marking starts with day of initial prep.

Reminded staff that turning off hand sink faucets with a barrier is allowed to prevent re-contamination of hands at faucets after washing. Sent facility long form Vomit and Diarrhea Clean up Plan. Verified facility is using updated Employee Reporting Form, and verified employees do sign off on form. Forms stored in employee file.

Explained new inspection frequency for Risk 4 facilities. Explained goal and rationale for Educational Visits.

On site visit to facility for education visit. Prior priority violations include date marking, cooling, cold holding, and cooking. Observed all items properly date marked. Observed one container of feta from 4/10 in walk in and the same cheese dated for 4/10 in prep top cooler. CDI: Product voluntarily discarded. Observed all coolers working properly and holding items at or below 41F. Observed turkey prepped yesterday still cooling. CDI: Product voluntarily discarded. Observed diced tomatoes, pimento cheese, and corned beef cooling at proper rates. Corned beef was cooling while tightly packed from portioning this morning. However, staff changed product cooling method by relocating it to sheet pans, leaving bags open and placing them in the walk in cooler. Observed chicken cooked to over 165F. EHS and PIC discussed new inspection cycle frequency as well as other foodborne illness risk factors.

Educational visit conducted to review the following priority violations observed during the past 3 inspections.

Dish Machine 0ppm Chlorine - Dish machine is sanitizing properly. PIC produced proper test strips.

Cooling parameters and methods - Observed proper cooling parameters and methods for cooked noodles during visit. PIC asked for education on large amounts of cooling. EHS suggested using the walk-in freezer for larger items and to use thin metal sheet pans.

Proper storage of raw meats - Observed raw chicken stored above raw meat. This item was corrected during visit.

Discarding gloves and washing hands in between tasks and raw / ready-to-eat food items. Due to last inspection, employees have started using tongs to reduce contact with raw items and all employees have been instructed to change gloves and wash hands in between tasks. Storage of medications - All medications have been removed from above the prep cooler and are now stored in a safe, employee personal items area.

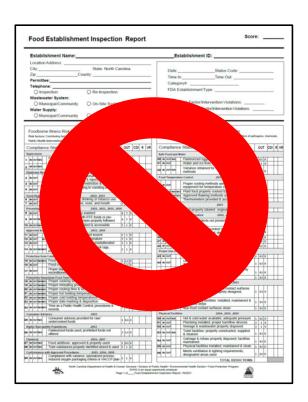
REHS discussed previous priority violations with PIC today during the educational visit. Here are the following: 2-102.12 (A) Certified Food Protection Manager (C) The PERSON IN CHARGE shall be a certified FOOD protection manager who has shown proficiency of required information through passing a test that is part of an ACCREDITED PROGRAM. Current Serve Safe certificates are for "food handler." PIC shall be a certified food protection "manager."

3-302.11 Packaged and Unpackaged Food - Separation, Packaging, and Segregation (P) FOOD shall be protected from cross contamination by: (1) Except as specified in (1)(d) below, separating raw animal FOODS during storage, preparation, holding, and display from: (a) Raw READY-TO-EAT FOOD including other raw animal FOOD such as FISH for sushi or MOLLUSCAN SHELLFISH, or other raw READY-TO-EAT FOOD such as fruits and vegetables,P (b) Cooked READY-TO-EAT FOOD. A large ham was located next to ready to eat foods. Raw animal food needs to be stored below and separate from ready to eat food. PIC relocated item. CDI 3-501.17 Ready-To-Eat Time / Temperature Control for Safety Food, Date Marking (Pf) A) Except when PACKAGING FOOD using a REDUCED OXYGEN PACKAGING method as specified under § 3-502.12, and except as specified in (E) and (F) of this section, refrigerated, READY-TO-EAT, TIME/TEMPERATURE CONTROL FOR SAFETY FOOD prepared and held in a FOOD ESTABLISHMENT for more than 24 hours shall be clearly marked to indicate the date or day by which the FOOD shall be consumed on the PREMISES, sold, or discarded when held at a temperature of 5oC (410F) or less for a maximum of 7 days. Several containers of food were observed with no date mark in the upright refrigerator in the kitchen. Foods that are held over 24 hours shall have a date mark and used or discarded within 7 days of prep/opening. PIC placed date marks on items. CDI

Additional Comments

EHS reviewed all violations from the past three inspection on the left side of the sheet with both the Manager and the Chef, Both reviewed and discussed how establishment is working toward solving repeat violations and Priority and Priority Foundation Violations, implementing new procedures and policies. EHS and Mangers reviewed SOP for using the 3-compartment sink as a meat prep area, as well as a vegetable wash area. (Washing, Rinsing, and Sanitizing the entire sink after each change from dishes, meat prep, and vegetable prep. Also reviewed written procedures for TPHC, establishment had sausage gravy written procedures on hand, but a discussion was had on simplifying the verbiage and writing the key aspects of the cooking and holding process for each item. Establishment to update procedures prior to next inspection. Lastly EHS provided several handout and educational graphics regarding priority and priority foundation violations for establishment to review and post if needed EHS sent email to manger with graphics on date marking and food storage in Spanish. Establishment may reach out to EHS at any time to review or discuss a procedure once updated.

- Educational visits <u>ARE NOT</u> inspections!
- NOT an opportunity to find new violations
- Can take place in the dining room, PIC office, or kitchen
- Demonstrations
 - Calibrating food thermometers
 - Checking sanitizer concentration
 - Checking a final cook temperature



Permit Actions



Permit Actions

- Use .2600 Rule(s) on permit action forms
- Use Food Code citation to support the rule violation
- Provide adequate comments on permit action form or comment addendum
- Provide all required information on form
- Advise operator of appeal rights

Scenario #1

During an inspection it is observed that one of two hand sinks available to wash employees' hands is broken and unable to be used. The only hand sink available is at the bar area. A verification visit was conducted on the 10th day and the sink is still unable to be used.

N.C. DEPARTMENT OF HEALTH AND HUMAN SERVICES DIVISION OF PUBLIC HEALTH ENVIRONMENTAL HEALTH SECTION

Notice of Intent to Suspend or Revoke Permit

COUNTY	:			
NAME:		ID:		
STREET:				
CITY:		DATE:		
STATE:		TIME		
Dear Owner or Operator:				
Your establishment has been inspected in acco	rdance with the laws and rules governing:			
(X) food and lodging establishments in North Carolina General Statutes 130A-247 through 130A-250 and related statutes and Title 15A, Subchapter 18A, of the North Carolina Administrative Code, Rule .2600 and related rules.	related statutes and Title 15A, Subchapter 18A, of the North Carolina Administrative Code,	() tattooing in North Carolina General Statutes 130A-283 and related statutes and Title 15A, Subchapter 18A, of the North Carolina Administrative Code, Rule .3200 and related rules.		
	as determined that the establishment is in violati	ion of Title 15A, Subchapter 18A, of the North		
Carolina Administrative Code, due to the following	ng noncompliant items: VIOLATIONS NOTED – Please List			
15A NCAC 18A .2655: Hand sink is brol	cen and not available for use by food em	ployees to wash their hands in		
	shall remain in good repair and accessib	ple to food employees per 5-205.11 and		
5-205.15 of the NC Food Code.				

Scenario #2

During an inspection you walk over to the three compartment sink and underneath the sink you see a gray liquid backing up from the drain and discharging onto the floor. The PIC states it has been like this for 3 days. You determine immediately that sewage is backing up in the kitchen.

N.C. DEPARTMENT OF HEALTH AND HUMAN SERVICES

N.C. DEPARTMENT OF HEALTH AND HUMAN SERVICES DIVISION OF PUBLIC HEALTH, ENVIRONMENTAL HEALTH SECTION

NOTICE OF IMMEDIATE PERMIT SUSPENSION OR REVOCATION

NAME:		ID:
STREET:		
CITY:		DATE:
	COUNTY:	TIME
Dear Owner or Operator:		
Your establishment has been inspected in accorda	ance with the laws and rules governing:	
(x) food and lodging establishments in North	() public swimming pools in North Carolina	() tattooing in North Carolina General
Carolina General Statutes 130A-247 through	General Statutes 130A-280 through 282 and	Statutes 130A-283 and related statutes and
130A-250 and related statutes and Title 15A,	related statutes and Title 15A, Subchapter 18A,	Title 15A, Subchapter 18A, of the North
Subchapter 18A, of the North Carolina	of the North Carolina Administrative Code,	Carolina Administrative Code, Rule .3200 and
Administrative Code, Rule .2600 and related	Rule .2500 and related rules.	related rules.
rules.		
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As a result of an inspection, the Department has determined that the establishment is in violation of Title 15A, Subchapter 18A, of the North Carolina Administrative Code, due to the attached noncompliant items.

VIOLATIONS NOTED - Please List

15A NCAC 18A .2655: Sewage is backing up into the kitchen from the drain under the three-compartment sink.

Sewage shall be conveyed through an approved system that is properly maintained per 5-402.13 of the NC Food Code.

EHS4009B Immediate-Suspension Environmental Health Section (Review 7/13)	

Summary

- Well written comments are important!
- Know how to conduct an educational visit and how to document them
- Use appropriate citations on permit action forms

Questions?