

# A MATTER OF RECORD

*Written proof that your staff follows food safety procedures to the letter could prove your ace in the hole in a court of law.*

**I**t happens all too often. People get sick, decide it must have been something they ate, pick a restaurant that has deep pockets and sue. When that happens, records can really save your bacon.

"I was an expert witness in a case that was filed two years after the fact," says Alita Rethmeyer, president of Consulting Nutrition Services, Calabasas, Calif. "A lot can change in two years, but records can show what was done. They're better than memory."

Records not only document the history of what happens in an operation, they're also evidence of your commitment to food safety.

"It comes down to a question of who is most credible in court," says Dr. Frank Gomez, environmental health training coordinator for the Los Angeles County health department. "In addition to your own records, health inspection reports can be very helpful, too. If you consistently get an 'A' grade in L.A. County, for example, you're going to be more credible in court."

Gomez cites a case of a restaurant sued by the family of a victim who died. The family claimed it was from eating oysters. The restaurant's records showed that it had no oysters in stock on the day and time in question. The fact that the restaurant also documented the names of all



customers who ordered potentially hazardous foods, like rare beef and raw oysters, helped its credibility.

Record keeping is no doubt the most challenging part of an effective food safety system. It's tough enough to train your employees to handle food safely, but get them to write it down...?

And there are the questions: What do you track? When do you track it? Who tracks it? Who checks what you track? Where the heck do you store all those records, and for how long?

The truth is you don't need to go crazy documenting every single little food receiving, storing, prep, cooking and holding step your employees go through every day. But understand: If they've got to write it down, records serve as a reminder that there are steps that need to be taken for safe food handling. It's also a verification that the food was handled properly during those steps—it shows someone is watching. Records also can help protect you legally, should an outbreak ever occur.

"If people are taking temperatures and checking CCPs (critical control points where food, if mishandled, can

## Records You've Got To Keep

Even if you don't have a formal HACCP plan in place, there are some records you must keep, and others that you probably should keep if only for the reasons noted in this article—a reminder and a verification.

The one record all operators must keep if they serve fresh shellfish is a shellstock identification tag. This identifies the harvester and must be kept on file for 90 days after service. Other records might be required by local health departments.

"Usually health department sanitarians will look at things like pest control records if there's evidence of pests, or sometimes trash collection records," says Ellen Schroth, president of FoodSense, McLean, Va.



burger. If you know that a burger should reach the proper internal temperature in a specific number of minutes, and it doesn't, you'll know your grill has got some problems coming to temp. Don't forget the dishroom. Note the temperatures of the wash and rinse cycles as well as whether detergent and sanitizer dispensers have been properly loaded.

**Line Check:** At each shift, record the opening and closing temperatures of food on the service line.

**Receiving:** When product is delivered, record the date, time of delivery, temperature and condition of the product, any action taken (whether product is accepted or rejected), and make sure the person receiving the delivery writes his or her initials. Make sure all products are labeled before being stored, and note the time they were put away. You can record this info right on the shipping label.

**Prep:** As potentially hazardous food is taken out of the walk-in for prep, record the date and the time it was taken out and its temperature, then note the temperature and time when it's put back into the walk-in. You can use an

egg timer set at 20 or 30 minutes to get employees into the groove of working in small batches. That way, foods taken out for prep will never sit out beyond the four hour limit.

**Cooking/Reheating:** Record the final internal temperature of foods being cooked or reheated for service. Note the menu item and initials of the cook, manager or expeditor taking the temperature. The log should have space to note corrective actions.

**Holding:** Record temperature of both hot and cold foods being held for service. Depending on your operation, you may want to temp these foods every hour or so, but be sure to record temps at least every four hours (the maximum amount of time a food can stay in the temperature danger zone according to FDA Model Food Code). Logs should note date and time and initials. Leave space to note corrective action, such as reheating hot food to 165°F for 15 seconds if the temperature has fallen below 140°F.

**Cooling:** Keep a log when cooling foods so employees make sure that temperatures are reduced from 140°F to 70°F within two hours before being stored. For dense foods that take a long time to cool such as refried beans, establish benchmarks so employees don't have to stay late after work to see if the product has cooled to 41°F or below within another four hours. Do some tests during normal business hours. Divide the food into shallow pans, put it in the walk-in and take temperatures every hour so you know how long it actually takes for food to cool. Experiment and keep records until you have a benchmark that works. Then use that benchmark as standard procedure; have employees simply label leftover food with the date, time it was put away, temperature, and their initials.

## HACCP Principles

HACCP-based food safety systems are designed to help you evaluate and monitor the flow of food through your operation from receiving to serving. To develop a HACCP plan, follow these seven steps:

**1. Assess food safety hazards.** Identify the potentially hazardous foods you use and how they flow through your operation. Determine how hazards could contaminate your food.

**2. Identify critical control points (CCPs).**

Determine what steps you can take in the flow of food that would prevent or eliminate a hazard.

**3. Set up critical limits.** Establish procedures that will enable you to meet critical limits at each CCP.

**4. Monitor critical control points.** Set up a system of checking CCPs to make sure critical limits are being met.

**5. Take corrective action.** When a critical limit is exceeded, correct the problem immediately.

Determine why the problem occurred and change your procedure if necessary.

**6. Keep records.** Set up a record-keeping system to document all the steps you take to keep food safe.

**7. Verify the system is working.** Confirm the plan works making sure employees are following procedures, conducting food safety audits and testing random samples of your food.

## Simplify Your Life

"Approach record-keeping in a way that doesn't make more work for people," Rethmeyer advises. "Use documents you're already working with, such as invoices, bills of lading, recipes and order sheets."

Temperatures and time of receipt for delivered goods can be written right on the invoice, for example. Kitchen expeditors can note final food temps on order tickets turned in by the waitstaff or generated by the POS system. Log date, time and temperature of prepped food being put in the walk-in on blue painter's masking tape—it can be easily removed from containers after the food has been used.

As you begin to record more information, create log sheets on your computer for each area you want to monitor. Put them on clipboards and hang the clipboards in the kitchen with a pen or marker attached.

## Twenty First Century Technology

There are a number of devices on the market that can make

## Resources

For more information on thermometers, recording devices and HACCP record-keeping systems contact the following:

Atkins TempTec, Inc., Gainesville, FL, 800/284-2842, [www.atkinstempotec.com](http://www.atkinstempotec.com).

Cooper Instrument Corp., Middlefield, Conn., 860/347-2256, [www.cooperinstrument.com](http://www.cooperinstrument.com).

Foodservice Cafe (HACCPPro), Miami, Fla., 877/707-CAFE, [www.foodservicecafe.com](http://www.foodservicecafe.com).

KTG, Inc. (TempTrak), Cincinnati, Ohio, 888/533-6900, [www.temptrak.com](http://www.temptrak.com).

Sensitech (QuickCheck), Beverly, Mass., 800/843-8367, [www.sensitech.com](http://www.sensitech.com).

it easier to monitor CCPs and keep records. Several makes of digital probe thermometers allow you to key in a code for the specific food or piece of equipment being monitored. The thermometer then stores the time-stamped temperature until the information is downloaded to a computer.

More sophisticated devices use bar code scanners to identify a product or location (i.e., walk-in, fryer, etc.) to help eliminate errors. Some systems automatically upload the information to computers using wireless transmitters. The latest devices incorporate digital thermometers into PDAs (personal digital assistants) that can walk employees through a checklist step by step using words (in English or Spanish) and icons.

One company has even developed a system that automatically monitors all the workings of a restaurant through sensors and video cameras and uploads the info to a Web site. Managers can check on everything from sales by menu item to employee behavior on the job. Many of these systems can alert managers by pager when food or equipment temperatures are outside critical limits. The advantages can be tremendous. Paper records can be eliminated, and managers will know if procedures are being followed.

While some operators may fret about how much it will take to train employees to use technology, in many cases it's

easier than training them to record information manually.

## Who's Responsible?

Managers are ultimately responsible for making sure procedures are followed, including keeping records. But managers have a host of other responsibilities that make it impossible for them to personally check and sign off on all areas of the restaurant. The best way to keep records is to build record-keeping into employees' job descriptions.

"There's a tendency to assign one person to be responsible for recording information," says Ellen Schroth, of McClean, Va.-based FoodSense, a food safety consulting firm. "But operators should train their employees to focus on their own stations and what they're supposed to do." No matter how simple or sophisticated the technology you use to keep records,

make sure you use a checklist to remind managers and employees of what to monitor and record.

"If no one's checking up, it will fall by the wayside," Schroth says. "Make it a priority."

## How Long Do You Hang On To Records?

Since foods prepared in foodservice operations are usually consumed right away, any incidents of foodborne illness are likely to occur within weeks, days or even hours. Most experts suggest keeping records for about six months.

Records should be readily accessible to health inspectors, which means you should keep them on site. If you're recording information manually, keep logs in three-ring binders in the kitchen office.

No matter what system you find most effective, keeping records provides the kind of discipline that reinforces sound food safety procedures. Those records also might protect your reputation and your business some day. ○

## Reminder

**All your records will be useless if your thermometers are out of calibration. Make it a standard operating procedure to calibrate all your thermometers at least once a day if not at the beginning of every shift. Keep a log of the date, time and person conducting the calibration.**

# Documentation

