

ACTIVE MANAGERIAL CONTROL INCENTIVE PROGRAMS ASSESSMENT

NATIONAL ENVIRONMENTAL HEALTH ASSOCIATION

IN CONJUNCTION WITH THE
RETAIL FOOD SAFETY REGULATORY ASSOCIATION COLLABORATIVE



EXECUTIVE SUMMARY

Active Managerial Control (AMC) is the purposeful incorporation of specific actions and procedures into the daily operations of a retail foodservice establishment. Through these actions, operators/owners can achieve control over foodborne illness risk factors, ultimately increasing food safety within the establishment. A major principle of AMC is the culture shift from a reactive mindset to a proactive approach to food safety. Environmental health organizations can assist food establishments in their journey to achieving AMC by providing supportive resources and through the use of AMC Incentive Programs.

The National Environmental Health Association (NEHA), in conjunction with the Association of Food and Drug Officials (AFDO), the Centers for Disease Control and Prevention (CDC), the Conference for Food Protection (CFP), the Food and Drug Administration (FDA), and the National Association of County and City Health Officials (NACCHO), conducted a nationwide assessment to collect information regarding AMC programs. The assessment aimed to identify key materials and best practices used by state, local, tribal, and territorial (SLTT) regulatory organizations to incentivize AMC programs at retail food establishments. Information about the survey was sent to the representatives of 24 environmental health organizations across the nation that were identified as having an AMC Incentive Program and/or AMC resources for retail food establishments. The findings of the survey are provided in this report.

The assessment revealed many commonly used resources and an abundance of recommendations and best practices from industry experts in AMC. Providing guidance documents and templates, along with direction, support, and training, is essential for environmental health organizations to promote and incentivize AMC within their jurisdictions. While implementing these programs may be time and resource-intensive, best practices identified within this assessment can guide organizations in these efforts. Additionally, many organizations are willing to share established resources to achieve the common goal of increased food safety within retail food establishments throughout the nation.

RESPONDENT OVERVIEW

NEHA received 13 responses from environmental health professionals working in various environmental health organizations across the nation, representing a 54% response rate. The highest represented workforce category was City and County Health Departments (77%), with the remaining respondents representing State Health Departments (15%) and Local Government (8%). Respondents self-identified as representing various roles within their respective organizations including Consumer Protection Coordinator, Environmental Health Specialist, Deputy Environmental Health Director, Planner Principal, Program Manager, Program Supervisor, and Sanitarian.

Survey respondents were asked to approximate the number of retail food establishments that their organization has regulatory authority over. The respondent from the smallest organization estimated they had authority over 270 establishments, while the largest organization estimated 24,000 establishments. Both organizations are City or County Health Departments. Figure 1 categorizes the number of retail food establishments under the jurisdiction of the responding organizations. Most responding organizations estimate that they have regulatory authority over 1,001-5,000 food establishments.

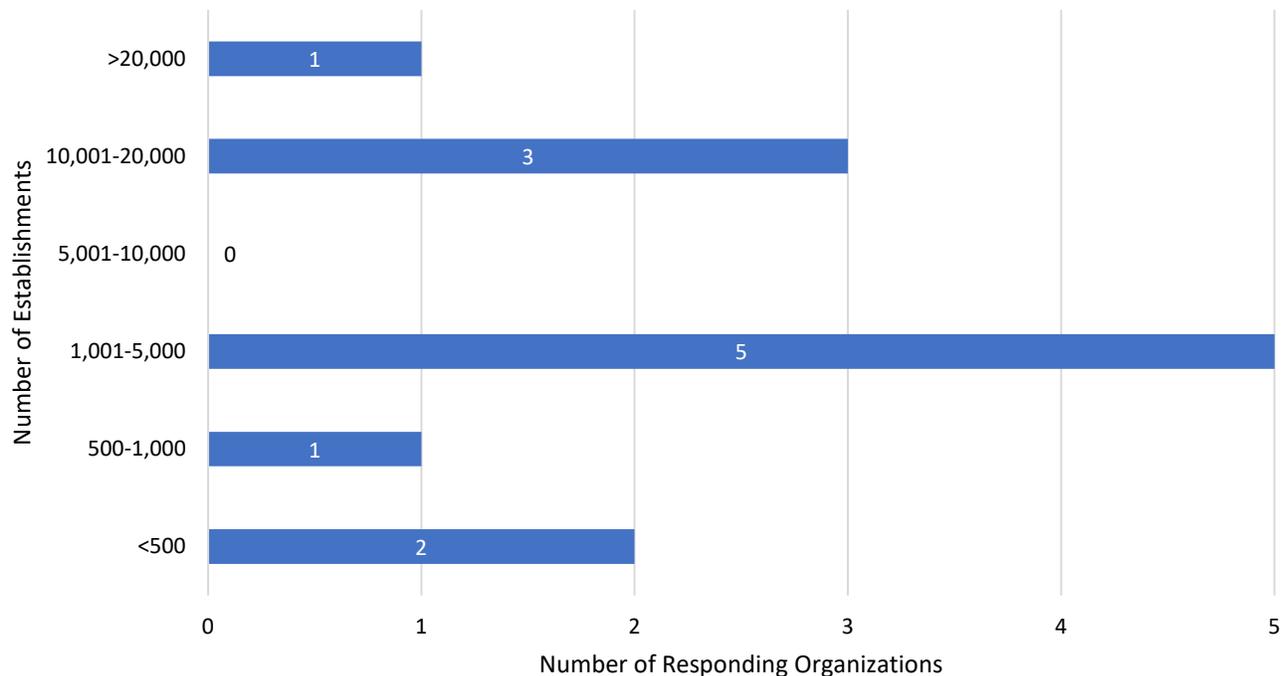


Figure 1. Jurisdiction Size of Responding Organizations

ACTIVE MANAGERIAL CONTROL RESOURCES PROVIDED TO FOOD ESTABLISHMENTS

Respondents were asked several questions about the resources and materials they offer to assess the types of resources most frequently provided to retail food establishments. According to the survey, the most frequently offered resources are guidance materials and posters/signage (both offered by 100% of respondents). Figure 2 shows the most commonly provided resources.

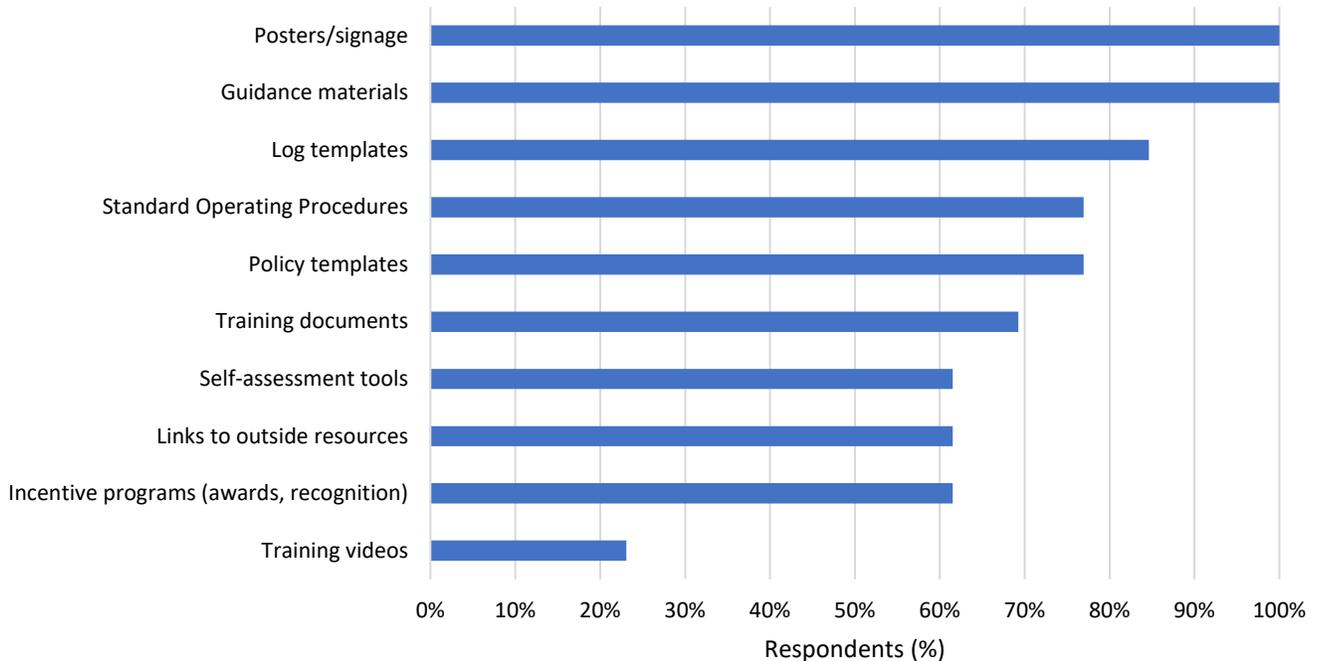


Figure 2. Resource Types Provided by Respondent Organizations

To better understand the scope of materials supplied for retail food establishments, respondents were asked to identify the topics covered in both guidance materials and log templates. Figures 3 and 4 identify the topics covered in the provided guidance materials and log templates, respectively. More than 75% of surveyed organizations provide guidance materials about safe food handling, handwashing/glove use, employee health/personal hygiene, and cooking/reheating/cooling/holding/thawing. Additional resources identified by respondents in the “other” category were guidance documents for highly susceptible populations, time as public health control, service animals, parasite destruction, and specific food safety (shellfish, eggs).

ACTIVE MANAGERIAL CONTROL RESOURCES PROVIDED TO FOOD ESTABLISHMENTS (CONT.)

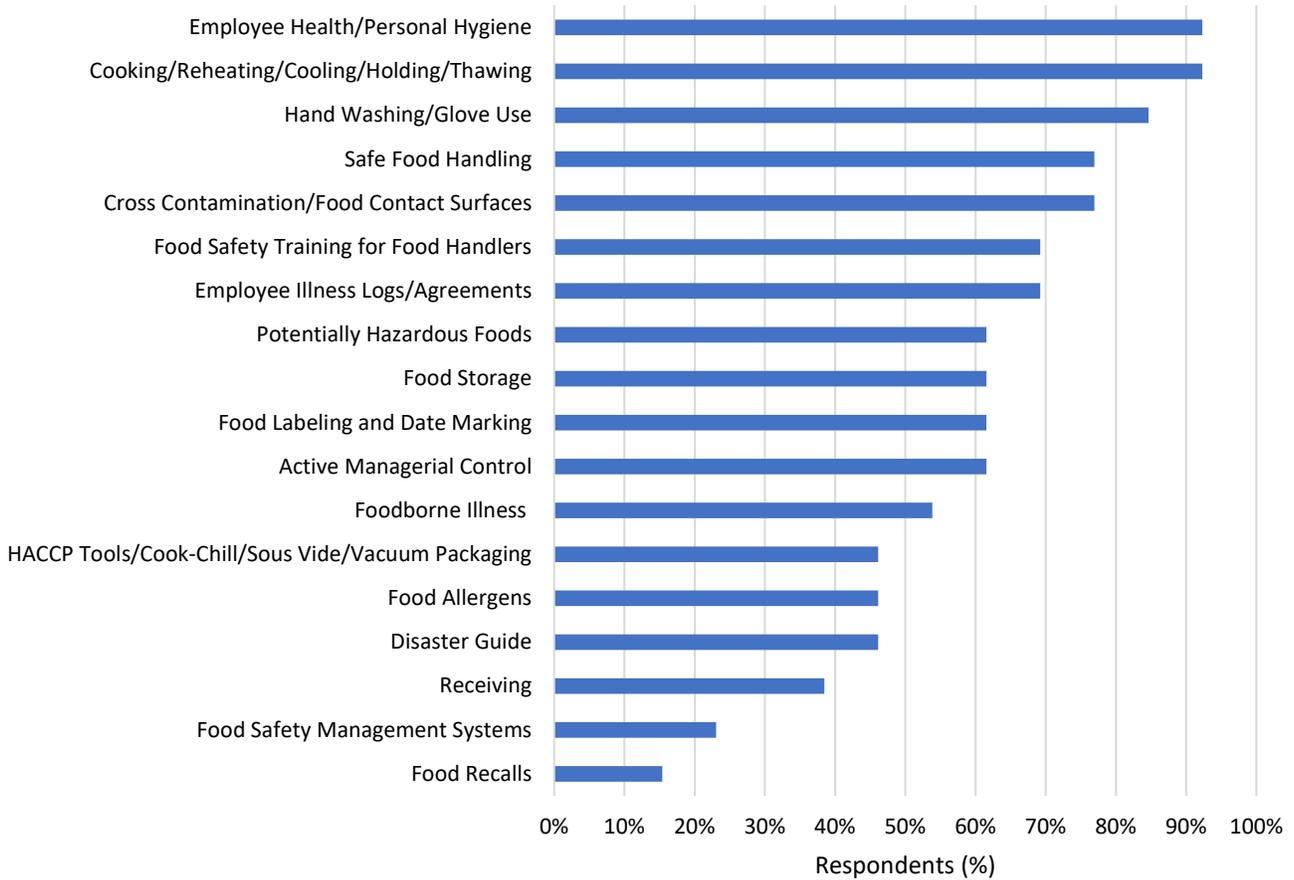


Figure 3. Topics Identified in Guidance Materials

The most common types of logs provided are temperature logs (77%) and sanitizing logs (69%). In addition to the log templates found in Figure 4, respondents identified the following logs provided by their organizations: employee personal hygiene logs, employee illness logs, employee health check logs, and discarded or damaged food logs.

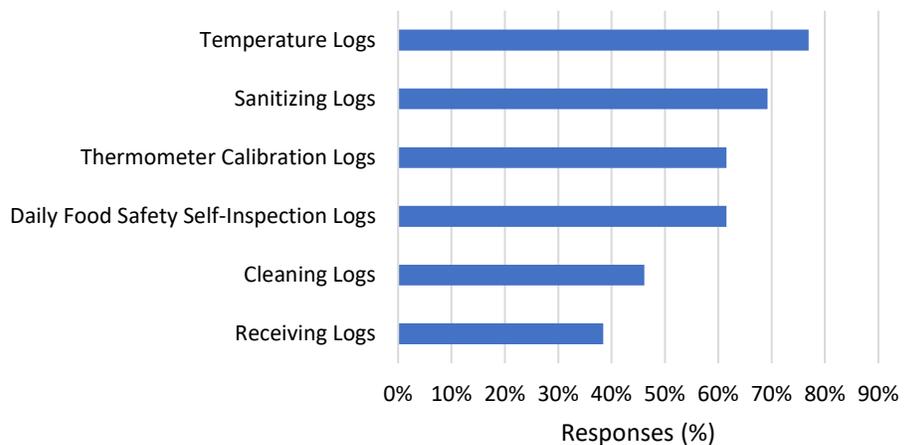


Figure 4. Topics Identified in Log Templates

ACTIVE MANAGERIAL CONTROL RESOURCES PROVIDED TO FOOD ESTABLISHMENTS (CONT.)

Promotion of AMC Resources

Respondents were asked how they promote their AMC resources to food establishments within their jurisdictions. All survey respondents replied that they promote resources during in-person inspections. Figure 5 shows the other avenues used by environmental health organizations to disseminate AMC resources.

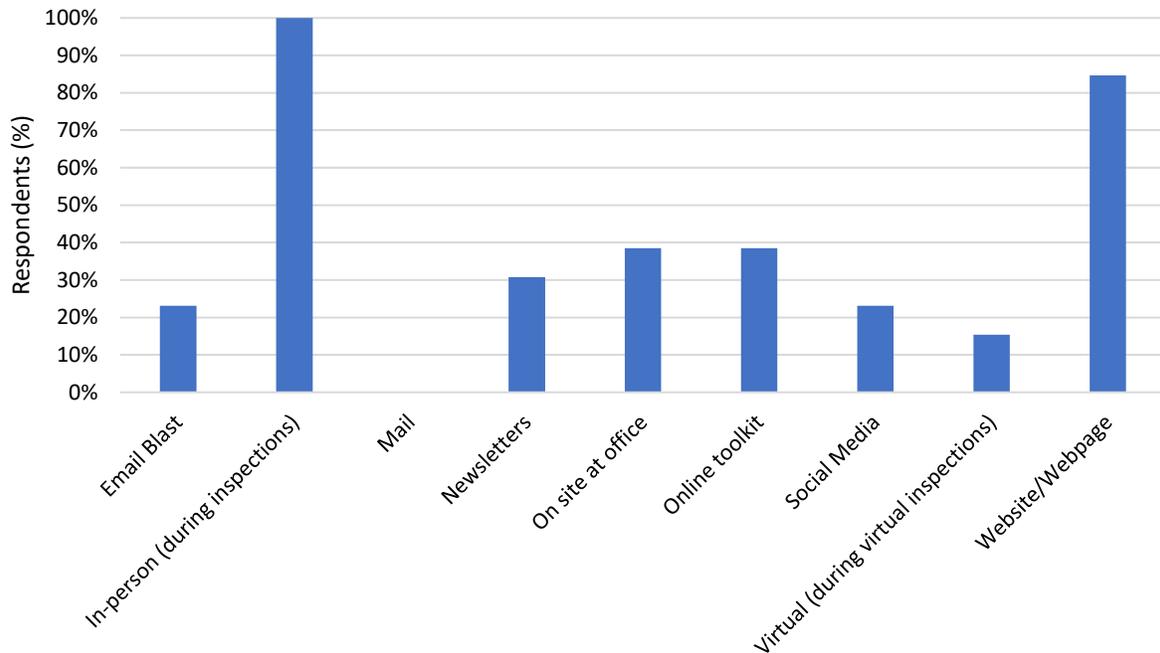


Figure 5. Types of Promotion Used for AMC Resources

An important feature of any piece of educational material is providing the resource in the first language of the user when possible.

Respondents were asked in which languages their resources are provided. Of the 13 respondents, only two do not provide resources in non-English languages. Outside of English, Spanish (77%) and Chinese (62%) are the most frequently offered languages. Figure 6 displays the non-English languages in which resources are offered.

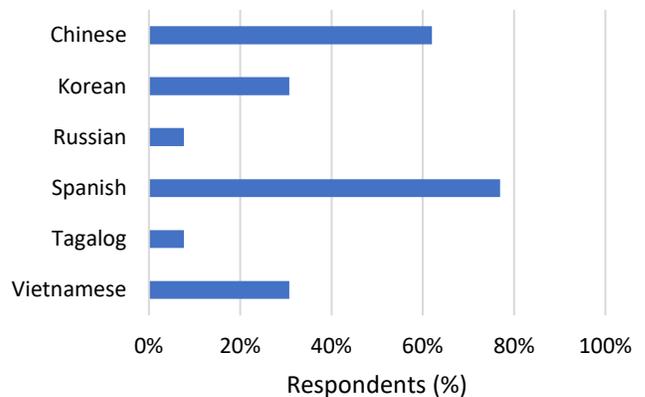


Figure 6. Non-English Resource Languages

ACTIVE MANAGERIAL CONTROL RESOURCES PROVIDED TO FOOD ESTABLISHMENTS (CONT.)

Food Safety Training

In addition to resources for AMC and food safety, respondents were asked if their organization offers training classes. Fifty percent (50%) of organizations offer food safety training classes for food establishment managers, including Certified Food Protection Manager, principles of AMC, food safety education, AMC for managers, and basic food safety classes. Additionally, 62% of organizations offer food safety training classes for food handlers. These classes include state-specific food handler certification courses, food safety education, state food safety food handler, oral culture food handler training, basic food handler course, basic food safety class with demonstrations, and on-site training related to identified critical risk factors from routine inspections. Of the organizations that offer training classes, 38% offer classes online and 62% offer classes in person (when circumstances allow). One respondent commented that translators for non-English languages are made available for in-person classes. Respondents were also asked if their jurisdiction requires a Person in Charge to have food safety knowledge and proficiency by passing an accredited food safety program. Ninety-two percent (92%) of respondent organizations answered “Yes”.

Two-thirds of respondents said that they perform an assessment of AMC practices in conjunction with regulatory inspections. A quarter of respondents replied that their organization has a tool specifically for AMC assessments.

ACTIVE MANAGERIAL CONTROL INCENTIVE PROGRAMS

An AMC Incentive Program offered by an organization encourages food establishments to achieve AMC by incentivizing awards and recognition. Establishments can qualify for these programs by meeting a set of standards or criteria. Respondents were asked if their organization offered an AMC Incentive Program for retail food establishments (responses shown in Figure 8). Approximately half of survey respondents attested that their organization offers AMC Incentive Programs.

AMC Incentive Programs Offered

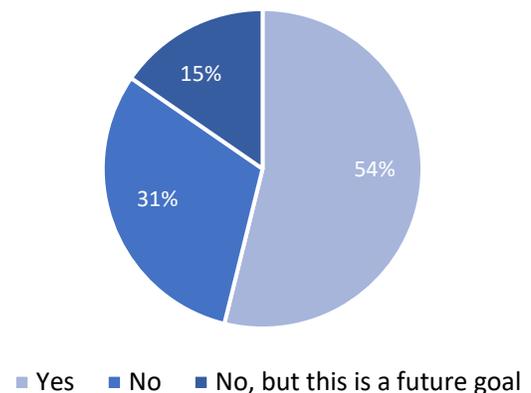


Figure 8. Percent of Organizations with AMC Incentive Programs

ACTIVE MANAGERIAL CONTROL INCENTIVE PROGRAMS (CONT.)

Figure 9 shows the different types of incentives offered to establishments that meet criteria for participation. All responding organizations offer at least a certificate of achievement or similar document to participating establishments. In addition to the response choices offered on the survey, respondents also provided additional incentives: “reduced risk category, so less frequent inspections” and “recognition in a newsletter and on social media”.

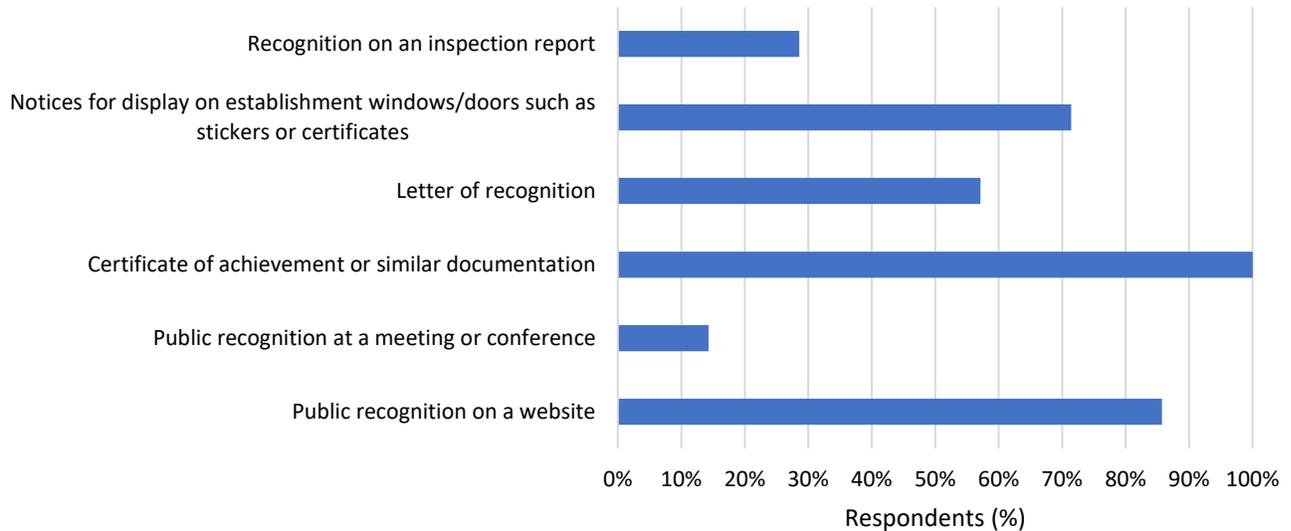


Figure 9. Incentives Provided for Participation in AMC Incentive Programs

Criteria for Participation

Criteria for participation in incentive programs varied among respondents, although most included a scoring system, presence of active food safety management systems (policies/procedures, SOPs, staff training, etc.), and/or positive results of inspections or on-site assessments. The following comments are examples of requirements for participation:

“Must have policies developed for the top 10 foodborne illness risk factors and an associated training and monitoring/verification method in place.”

“(Fifty) 50 points or more on our AMC assessment.”

“Demonstration of knowledge, inspection absent of critical/priority violations, intentional & proactive food safety management systems.”

“Facility must have an AMC [program] in place to include: logs, written SOP's, staff trained in basic food safety within three months of hire, be in good standing with the health department and [presence of] a CFPM [Certified Food Protection Manager].”

ACTIVE MANAGERIAL CONTROL INCENTIVE PROGRAMS (CONT.)

Benefits/Outcomes of AMC Incentive Programs

Respondents were asked an open-ended question about the perceived benefits/outcomes of their respective AMC Incentive Programs. The following comments are examples of these observations:

“Better inspection scores, reduced risk factor violations, better working relationships, and less FBI [foodborne illness] outbreaks.”

“These facilities have fewer violations, and [we] have been able to conduct fewer inspections - freeing up time for places that are non-compliant... It is a very positive outcome for both the facility and the health department.”

“A reduction in Priority violations at establishments that have attended our AMC class and used the associated AMC resources.”

“In most cases, facilities improved when AMC was implemented, and facilities were able to demonstrate compliance in their routine inspections. The success was due in part to the owner or manager's desire to improve their retail food operation in conjunction with staff's understanding of how to implement safe food handling as often there is a shift in behavior.”

“The facilities who routinely win this award rarely have violations found during inspections.”

Resources used for Creating AMC Incentive Programs

Respondents were asked to select the resources that were used to create their AMC resources and or AMC Incentive Program. The number one response to this question was “collaboration with other organizations”. Figure 10 shows the other responses.

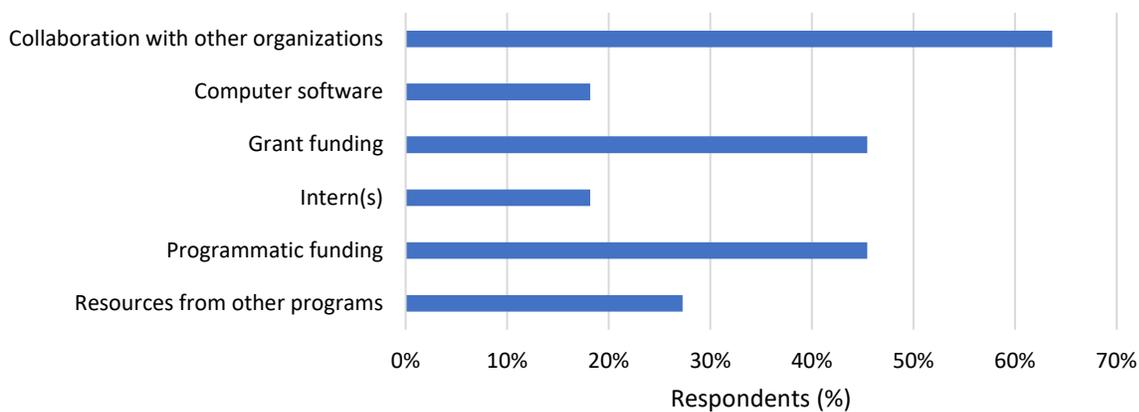


Figure 10. Resources Used to Create AMC Programs

LIMITATIONS ENCOUNTERED BY ENVIRONMENTAL HEALTH ORGANIZATIONS

The survey presented a series of potential limitations that an organization might face when encouraging AMC in food establishments. Figure 11 shows the percentage of respondents who affirm that these limitations apply to their organization. Of note, none of the respondents selected “lack of training materials for staff”, indicating that in general, environmental health staff have the educational resources needed to encourage AMC in food establishments. In addition to the options provided, comments were made about the following limitations:

“Lack of training presentation(s) for industry.”

“High employee turnover rate of many facilities results in difficulties establishing consistency with AMC.”

“We no longer have a publications specialist to develop outreach and maintain [the] website.”

Additionally, a respondent mentioned the effect of the COVID-19 pandemic on their organization’s ability to provide AMC resources and or AMC Incentive Programs:

“COVID-19 has put a damper on the program...”

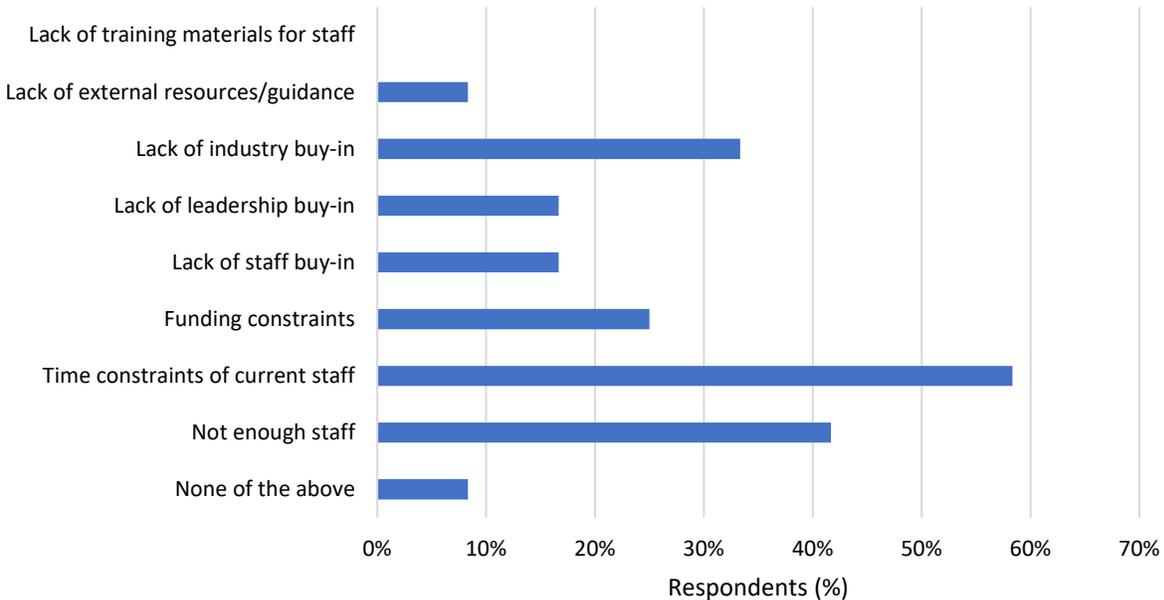


Figure 11. Limitations Faced when Encouraging AMC

Involving the Industry in AMC Efforts

In an effort to acquire the recommendations of AMC experts within the environmental health profession, respondents were asked open-ended questions to gain their insight into best practices for incentivizing AMC. Many responses for the first question, “What is the best way to involve industry in AMC efforts?”, are as follows:

“Giving them handouts and possibly have criteria they must meet on food safety inspections.”

“One to one contact between regulators and food establishment operators.”

“Include them in the development and improvement of AMC efforts. We use stakeholder meetings to engage our customers in this process.”

“Incentives.”

“Collaboration through the field inspectors by providing resources and making referrals to the AMC trainers.”

“Talk with them directly.”

“We collected information on best practices from various establishments that demonstrate AMC and used this information to develop our own tools, resources, and program criteria. After program creation, we engaged the same partners in a pilot and solicited feedback on program criteria and application process. Feedback was incorporated into the program before wide release.”

“Promote during inspections, stakeholder meetings, promote in social media.”

Key Materials

In addition to the information collected earlier in the assessment on AMC resources that are provided by responding organizations, respondents were asked to provide their opinion on the question, “If another jurisdiction wants to implement an AMC program for their food establishments, what are the key materials that they should provide?” Responses included the following comments:

“Examples of what AMC is. Many of the food operators do not take any action when it comes to teaching their staff about food safety and what is expected on a daily basis.”

LESSONS LEARNED FROM EXPERTS IN AMC (CONT.)

“First...it is critical that regulators understand how a food establishment operates. Second...in-person learning is most effective since that is how most operators train their workers. In-person learning can then be supported by printed pictorial reminders and online tools. Start with education about foodborne illness risk factors.”

“Risk control plans, fact sheets, and guidance documents [provided one-on-one].”

“Include stakeholders in the process so you don't waste resources on providing a product that does not meet the needs of operators. Use other jurisdictions that have already developed materials, so you don't start from ground zero. We share all of our materials with any jurisdiction that requests them.”

“Tool kits (SOP templates and verification tools such as logs), on-site trainers, and an incentive program.”

“I recommend having a large host of reference materials (logs, training docs, SOPs, etc.) but limiting the resources for a starter packet to only those necessary for an introduction to AMC. In our "Toolkit", we include: A table of contents, an introduction to AMC, AMC self-assessment, introduction to SOPs, a sample SOP, a blank SOP template, AMC daily self-inspection form, AMC progress report, and a listing of all of our available resources in case they want more.”

“Start easy with just providing handouts for the facilities to have in the back of house... outlining requirements of the food code in an easy to understand manner.”

“Internally - training on risk-focused inspections, inspection protocols, quality control of written and fieldwork, and forms/marking instructions that support program approach. Industry: an EASY to use model - they like 1-page SOPs, visual posters (like the oral culture learner posters from FDA), checklists and logs.”

“Resources such as signs, logs, etc. and training.”

RECOMMENDATIONS

The responses from AMC experts gathered in this assessment can help to guide similar environmental health organizations in the provision of AMC resource materials and the implementation of AMC incentive programs. Respondents suggested starting small, providing a set of key materials for retail food establishments on a webpage, and promoting resources during in-person inspections. A “starter tool kit” might include the following materials:

Guidance Materials and Posters/Signage

Safe food handling

Handwashing/glove use

Employee health/personal hygiene

Cooking/reheating/cooling/holding/thawing

Log Templates

Temperature logs

Sanitizing logs

When developing materials, experts recommend utilizing resources that have already been developed and adjusting them to meet the specific needs of the target community. Review of such materials should include stakeholders (i.e., retail food establishment operators, community members, etc.) to help determine these needs. Due to the potential time constraints of staff, students or interns may be another resource that can be utilized during the creation of AMC programs. Organizations should also consider the common first languages within their communities to determine the non-English languages in which to provide resources. In addition to written materials, environmental health organizations may want to consider implementing online or in-person classes to educate establishment managers and food handlers on basic food safety and AMC principles.

Another best practice identified for AMC is the use of an AMC Incentive Program. As the name suggests, these programs help to encourage AMC by incentivizing awards and recognition for the food establishment. Collaboration with other organizations was found to be the best way to create and implement an incentive program. To evaluate AMC within an establishment, environmental health organizations may want to consider adopting or developing an assessment tool to address AMC practices and incorporating this into regulatory inspections.

Ultimately, it is essential that environmental health organizations partner with retail food establishments to help them achieve control over foodborne illness risk factors. Respondent organizations have found that AMC incentive programs are a tool that can help to reduce inspection violations and overall foodborne illness outbreaks.