

Evaluation of HACCP Program in Plano, Texas Resulted in New Approach to Guidelines and Inspections

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The City of Plano Environmental Health Department believes an educated food worker will decrease the probability of foodborne illness. Hazard Analysis Critical Control Point (HACCP) principles are designed to reduce the risk of foodborne illness. Plano brought HACCP principles to food establishments by providing an evaluation and basic framework to build a HACCP program.

A Hazard Analysis Critical Control Point (HACCP) evaluation program was implemented by Plano in 1994. Current records date back to 1996.

A risk assessment tool was utilized by the Environmental Health Department to categorize permitted food service establishments in the City. Establishments were categorized as high, moderate, or low risk, based on individual Risk Assessments. The Department policy was to schedule and perform 24 HACCP evaluations per year, targeting high-risk establishments. The goal of the program was to reduce hazards contributing to food-borne illness, to reduce or eliminate critical violations and to encourage establishments to incorporate HACCP into their daily operations.

The program adopted was a modified version of a HACCP evaluation. A Plano Environmental Health Specialist with FDA training in HACCP principles and the specialist for the establishment performed the evaluation. Evaluations took two days in the restaurant and one day in the office to complete the evaluation and write the inspection report. The completed evaluation report included a computer inspection, a flow chart of the menu items tracked, a summary and recommendations for the establishment's use of HACCP principles and methods of application. The establishment was to complete the development of the HACCP plan, create additional flow charts and develop methods of compliance to reduce critical violations and eliminate hazards in the preparation process.

From 1996 to 2001 Plano's Environmental Health Specialists conducted approximately 136 HACCP evaluations.

In 2001 the HACCP program was evaluated for performance. To evaluate the program, two elements were considered: (1) the costs of conducting HACCP evaluations and (2) the achievement of stated goals.

The costs to conduct HACCP evaluations was determined by the number of health specialists (2) required to perform the evaluation, the total number of hours required (40) multiplied by the average hourly rate for the specialists. The cost of performing one HACCP evaluation was approximately \$993.

To determine if the goals of the program were being met, records of 21 random establishments that received

HACCP evaluations were reviewed. The records indicated 19 of the 21 establishments exhibited no reduction in the number of critical violations since the evaluation was completed. Two of the establishments showed an increase in the number of critical violations since the HACCP evaluation was completed.

Additionally, site visits were conducted at 15 establishments with prior HACCP evaluations, revealed only one facility was using HACCP principles two years after the evaluation.

Based on records, on-site reviews, and cost associated with conducting evaluations, the HACCP program was determined not to be achieving desired goals of reduction of critical violations, nor was HACCP part of daily operations in establishments. Reasons for this lack of participation included changes in management/personnel, no "buy-in" from management and lack of enforcement. At one establishment, the manager took the HACCP plan when he changed jobs. The HACCP Team was assembled to explore options and make recommendations for revisions to the program. Questions that needed answered included: How should the program be changed? Was there a way of performing the evaluation to provide information to the establishment and gain their cooperation in participating in a HACCP program?

The result is a program that maintains the principles of HACCP, provides a customized plan for participating establishments and incorporates changes made to the City Food Code.

The objective of the 2002 Hazard Analysis Critical Control Point (HACCP) Evaluation Program is to provide assistance to food establishments to develop a HACCP plan.

The goals of the program are to produce the safest food possible, reduce critical violations, and provide the education necessary to accomplish these goals.

Participants in the Program will be required to comply with the HACCP plan developed jointly with the Environmental Health Department. Input and cooperation will be critical to the HACCP plan development.

The evaluation includes an assessment of the potential hazards, type of food prepared on site, the preparation process, process based flow charts, time and temperature log sheets, equipment log sheets, when necessary receiving log sheets, and work with the establishment to develop and implement the system.

One to three establishments will be selected annually.

The routine specialist is part of the HACCP team working with the establishment. HACCP development progress on each establishment will be monitored

through the routine inspection process in addition to set appointments with the establishment by the HACCP team.

Establishment selection will be divided into two categories: (a) new establishments, and (b) existing establishments.

New establishments will be evaluated during the plan review process and again at opening. New establishments will submit menus for evaluation. Establishments declaring a developed HACCP plan will be asked to submit the plan prior to opening. The HACCP plan will be evaluated by the Department. If the plan does not meet the set requirements by the City of Plano Food Code the plan will be enhanced to comply with Code. This plan will be kept in the establishments file.

Existing establishments will be evaluated annually through the Risk Assessment process and inspection reports. The routine specialist will be asked to evaluate if an establishment could pose a public health hazard and recommend establishments that would benefit from a HACCP evaluation based on, but not limited to the following:

- (a) food handling practices
- (b) time & temperature logs or lack of
- (c) known operating procedures
- (d) routine inspection violations & ratings
- (e) number of valid complaints
- (f) enforcement actions taken
- (g) sanitation
- (h) employee hygiene
- (i) adequate equipment

The recommended establishments will be assessed based on the following criteria:

- (a) menu assessment
- (b) production process
- (c) handling of potentially hazardous foods
- (d) type of food preparation process
- (e) employee training program
- (f) possible contamination of food by customers
- (g) possible contamination of food by employees
- (h) employee hygiene
- (i) basic sanitation program
- (j) written procedures at establishment

The HACCP Team will monitor and enforce implementation of the HACCP plan. The Team and the routine specialist will carry out enforcement during both arranged and unannounced evaluations. All logs, flow charts, written procedures, and employee and supervisory training will be reviewed for compliance with HACCP program. HACCP plan requirements can be found in the City of Plano Code of Ordinances. As needed citations and other enforcement actions will be taken to bring the establishment into compliance.

When changes in management occur, the developed HACCP plan will be required to be passed to the incoming management team. The written plan and required documentation are to remain with the

establishment and be available to the HACCP Team and the routine specialist upon request to ensure compliance. Once the plan is implemented, it can be, and is encouraged to be, re-evaluated and enhanced.