



MEMORANDUM

Date: April 3, 2018

To: The Honorable Chairman and Members
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator

A handwritten signature in black ink, appearing to read "CHH", is written over the printed name "C.H. Huckelberry".

Re: **March 29, 2018 Memorandum from the Health Department Director Regarding Consumer Health and Food Safety**

The attached March 29, 2018 memorandum from Health Department Director Marcy Flanagan, highlights operating procedures in the Consumer Health and Food Safety Division that have been put into place since the Board of Supervisors adopted its new food code. The memorandum also summarizes the staff training and education that has occurred regarding these food code procedures and requirements, as well as continued plans for further standardization and quality control of the inspection procedures.

In addition, the Health Department is working to building partnerships with operators through the implementation of incentive programs. This is a departure from the traditional regulatory food safety compliance process. Staff are making available permit fee reductions, if steps can be implemented to affirmatively reduce risk of food borne illness. In particular for those food establishments that develop written policies, training procedures and monitoring logs. Also, an additional five percent fee reduction is available for elimination of trans fats from menu items and the disclosure of caloric value of menu items. Finally, an additional five percent fee reduction is provided to operators that consistently donate food to area food banks and programs that feed low-income populations.

This incentives-based regulatory process is creative from a food safety prospective and is clearly integrated with the larger goals of the Health Department in creating a healthier community.

CHH/anc

Attachment

c: Jan Leshner, Chief Deputy County Administrator
Dr. Francisco Garcia, Assistant County Administrator for Community and Health Services
Marcy Flanagan, Director, Health Department

Date: March 29, 2018

To: C.H. Huckelberry
County Administrator

From: Marcy Flanagan 
Health Department Director

Via: Jan Leshner 
Chief Deputy County Administrator

Francisco García 
Assistant County Administrator

Re: Consumer Health and Food Safety Update

Over the past three years, the Health Department's Consumer Health and Food Safety team has actively engaged in and implemented several changes to improve the quality and consistency of consumer dining and food safety in Pima County. Changes included the adoption of the 2013 FDA food code version, extensive stakeholder and staff training about the new food code that included uniform clarification and interpretative guidance for all Health Department inspectors. Additionally, Health Department leadership has engaged an external team to identify areas to improve the process, incorporate best practices from experienced inspectors, and incorporate them into the inspector standard operating procedures.

The following provides further information regarding departmental changes of processes, operating procedures, and efforts for support and guidance of local retail and food establishments.

Background

Prior to the adoption of the new code, Pima County was utilizing the State of Arizona 1999 FDA Food Code. This code had an inspection table of 28 different violation categories with multiple code citations for each code.

On April 1, 2016, the Board of Supervisors adopted the 2013 FDA food code following extensive research and open public forums conducted by Health Department Consumer Health and Food Safety leadership. A few notable changes within the 2013 FDA code are the violation categories increased from 28 (1999 Food Code) to 56 (2013 Food Code), inspections would be based upon a food safety risk assessment model, and the Provisional status changed to Probationary status. During the 9-month transition and implementation to the new code, violations that were new to the food code, were initially noted as Warning and not Violations in order to help educate the regulated community of the new violation categories.

In 2017, Health Department Inspectors began writing Violations instead of Warnings for new code violations.

Extensive Staff Training and Education

Following the Board of Supervisor's adoption of the new FDA food codes, all staff participated in extensive training and education regarding the new food codes and how to conduct inspections based upon Risk Assessment models. Additional internal strategies implemented include:

- Training officers, supervisors, and peers conduct ride along inspections with new staff
- Supervisors review all inspection documentation to ensure fair and consistent food code enforcement and interpretation
- Regular staff meetings are held to discuss issues, interpretations and needed policies
- Management provides a monthly summary for peer comparisons prior to issues
- It is mandatory for inspection territories to change every two years
- Extended hours to provide flexibility to vendor and allow for early evening and Saturday inspections in order to observe different aspects of the operation as to staffing, meal preparation, quantity of food being prepared, and food flow processes
- Bi-monthly ride along inspections where supervisor's shadow the inspector throughout the process and to provide feedback at the conclusion

External Evaluation

The goal of the Health Department is to continue to develop a fair and robust program with transparent standardized operating procedures. We are achieving this with the assistance of external consultants to assist in the development of inspector standard operating procedures that will reinforce and streamline the process to ensure a uniformed approach and clarity of inspector's role and execution of duties. Subsequently, trainings will be created that are specific and targeted to help inspectors perform more consistently, transparently, and efficiently. The second goal of this effort is to develop population metrics for food safety in Pima County that will allow us to demonstrate the health benefit of implementing the new food code.

Building Partnerships through Incentives

The Active Managerial Control Program is designed to help regulated food establishments incorporate measures that reduce the risk of foodborne illness incidents and offer healthy food options for the community. Regulated food establishments that develop written policies, training procedures, and monitoring logs to establish procedures that reduce risk for food borne illnesses can receive a 10% permit fee reduction. Furthermore, additional reductions are available for operators who provide menu offerings promote a healthy diet:

- Elimination of trans fats from menu – 5% fee reduction
- Providing total caloric intake information at the point of order – 5% fee reduction

Finally, in an effort to support the safe transfer of healthy food to low-income populations, a 5% fee reduction is provided to operators that consistently donate food to area food banks and programs that feed low-income populations.

Conclusion

Health Department leadership is dedicated to evaluating internal practices, developing partnerships to address gaps, identifying areas for growth that promote improved services and support for retail and food establishments. We are committed to being thoughtful and deliberate in our efforts to achieve operational standardization that is equitable and transparent while incorporating best practices for comprehensive operational procedures and protecting public health.