

How to Assess and Encourage Compliance with Food  
Code Requirements

# Employee Health Policy

# Importance of an Employee Health Policy

- Poor Employee Health and Hygiene is a foodborne illness risk factor
- Ill employees could lead to ill customers

# History in Fairfax

- 2010- 96% In Compliance
- Baseline survey
  - FS – 86% out
  - FF – 81% out
  - Child Care – 81% out
  - Nursing Homes – 68% out
  - Elementary Schools – 31% out
  - Hospitals – 40% out
- Staff Survey in 2010

# The Issues

- Staff don't have adequate resources and/or are not comfortable assessing compliance with Employee Health Policy requirements
  - Field Staff Survey Results:
    - Code citations and canned statements are not clear or helpful
    - Marking instructions for item #2 are not clear
    - Not sure of what to ask the PIC/CFM
    - How to measure the extent of PIC/CFM knowledge – Is naming of ALL of the Big 5, symptoms and exposures necessary to be in compliance?
    - Is simply providing our FCHD employee health handouts considered compliance?
    - Communication issues- technical information, multiple languages
- Food service establishments (FSE) don't have the knowledge/resources for compliance

# Goals

- Clarify how to assess a valid Employee Health Policy
- Provide resources and methods for introducing an Employee Health Policy into food establishments

# Solution, Part 1: Staff Training

- Goals:
  - Clarify how to assess a valid Employee Health Policy
  - Provide resources and methods for introducing an Employee Health Policy into food establishments
  - Discuss field implementation of new initiative

# Review of Food Code Requirements-

## Chapter 2

- It is a duty of the Person in Charge to inform employees of their responsibility to report health information as it relates to diseases transmissible through food.
- Employee Reports:
  - FBI Symptoms- Vomiting, Diarrhea, Jaundice, Sore Throat with Fever, Infected Skin Lesions
  - Diagnosis with FBI- E.coli, Salmonella Typhi, Shigella, Hepatitis A, Norovirus
  - Exposure to FBI
    1. Exposure to or suspicion of causing any confirmed disease outbreak of the Big 5.
    2. A household member is diagnosed with any of the Big 5.
    3. A household member attends or works in a setting experiencing a confirmed disease outbreak of the Big 5.
- Exclusion, Restriction, Reinstatement

# Compliance Assessment Decision Tree

- Decision Tree is designed for EHS use
- Addresses 3 elements of an effective employee health policy:
  - **Training of employees** on foodborne illness transmission, diseases, and symptoms
  - **Employee awareness** of their responsibility to report symptoms, diagnosis, and exposure
  - **PIC knows what action(s) to take** when an employee reports AND when or under what conditions the employee can return to work or assigned duties



**FOOD EMPLOYEE HEALTH POLICY  
ASSESSMENT OF COMPLIANCE STATUS  
DECISION TREE**

**Question 1:** Do you provide training to the food employees on foodborne illness prevention?



**NO** →

**Question 2:** Does this training include a review of the BIG 5 illnesses and symptoms?



**NO** →

**Question 3:** Are food employees made aware of their responsibility to report symptoms, diagnosis, and exposure to the PIC?



**NO** →

**Question 4:** Do you document this training?



**NO** →

**Question 5:** Can I see the documentation of this training?



**NO** →

**Question 6:** Can you describe what you do if an employee reports to you with symptoms, diagnosis, or exposure information?



**NO** →

"Yes" = PIC can explain their policy to the extent that when an employee is "sent home", the PIC knows when or under what circumstances the employee can return to work; OR PIC knows where to locate exclusion/restriction information (i.e. posted, online search, manager's manual, etc.).



Code Citation: 2-201.11(A)

If "YES" to all 6 questions, mark Item #2 on the inspection form as IN compliance.

If "NO" at any point as you progress through the decision tree, STOP and EDUCATE by providing and reviewing the employee health handouts. Mark Item #2 on the inspection form as OUT of compliance and cite 2-201.11(A).

# Compliance Assessment Decision Tree

- If “Yes” to all six questions:
  - Mark item #2 on the inspection form as IN compliance
- If “No” at any point:
  - STOP & EDUCATE by providing and reviewing the employee health handouts
  - Mark item #2 as OUT of compliance
  - Cite 2-201.11(A), then select “corrected during inspection”

# Proof of Training

- Demonstration of Knowledge
- Documentation

# Team Exercise



## Team Exercise Assessing a Written Employee Health Policy

- Remember the 3 elements of an effective employee health policy
- Pick a team spokesperson
- Determine if the written policy is IN or OUT of compliance
- If OUT of compliance, state which of the element(s) is missing



# Establishment Training

- Employee Health Policy Folder (Red)
  - Significance of having an EHP
    - Prevention of illness
    - Prevention of loss of business
  - Foodborne illnesses and symptoms
  - Reporting Agreement– employee responsibility and buy-in
  - Decision Guide – management responsibility
- Expectations
  - Second six month inspection will ask about implementation



## County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

### Form #1

### What is foodborne illness?

People can become sick from eating contaminated food. This is called foodborne illness. *Contaminated* means there are bacteria and viruses on the food which can make people sick. Sometimes the food in a restaurant can become contaminated because of the way an employee handles the food. If a customer becomes sick from eating contaminated food in a restaurant, there may be serious results. For example:

#### Employee

- Contaminates the food by not washing his/her hands properly;

#### Customer

- Gets sick
- Tells friends, relatives, neighbors not to eat at restaurant
- Complains to the health department
- Could take the restaurant to court

#### Restaurant

- Loses business
- Could go out of business

#### Employee

- Could be out of a job

The most common foodborne illnesses in the United States are:

- |               |                |             |
|---------------|----------------|-------------|
| 1. E.Coli     | 2. Hepatitis A | 3. Shigella |
| 4. Salmonella | 5. Norovirus   |             |

These illnesses are referred to as the **Big Five**. Often these illnesses have similar symptoms. It is important that an employee recognize the symptoms of foodborne illness:

- 1) vomiting
- 2) diarrhea
- 3) jaundice
- 4) sore throat with fever
- 5) skin infection such as open sores



=

**CALL YOUR  
MANAGER**





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### Form #2 EMPLOYEE ILLNESS REPORTING AGREEMENT

You play an important role in providing safe food to the general public. As a food handler, you have a responsibility to report the symptoms and conditions listed below.

I agree to report to the person in charge the following symptoms of foodborne illness:

1. Vomiting
2. Diarrhea
3. Jaundice – yellow skin or eye color
4. Sore throat with fever
5. Infected wounds

I agree to report to the person in charge if a doctor says that I have one of the following infections:

1. E.coli
2. Salmonella
3. Shigella
4. Hepatitis A
5. Norovirus

I agree to report to the person in charge if I am exposed to foodborne illness in the following ways:

1. I am exposed to a confirmed outbreak of foodborne illness;
2. Someone who lives in my house is diagnosed with a foodborne illness;
3. Someone who lives in my house attends an event or works in a place which has a confirmed outbreak of foodborne illness.

### Employee Acknowledgement

I understand that if I fail to meet the terms of this agreement, action could be taken by the food establishment or Fairfax County Health Department that may affect my employment.

Employee Name (please print) \_\_\_\_\_

Employee Signature \_\_\_\_\_ Date \_\_\_\_\_

Signature of Person in Charge \_\_\_\_\_ Date \_\_\_\_\_





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### Let's Start an Employee Health Policy!

#### Form #3 – Manager's Decision Guide – for managers;

##### Important points:

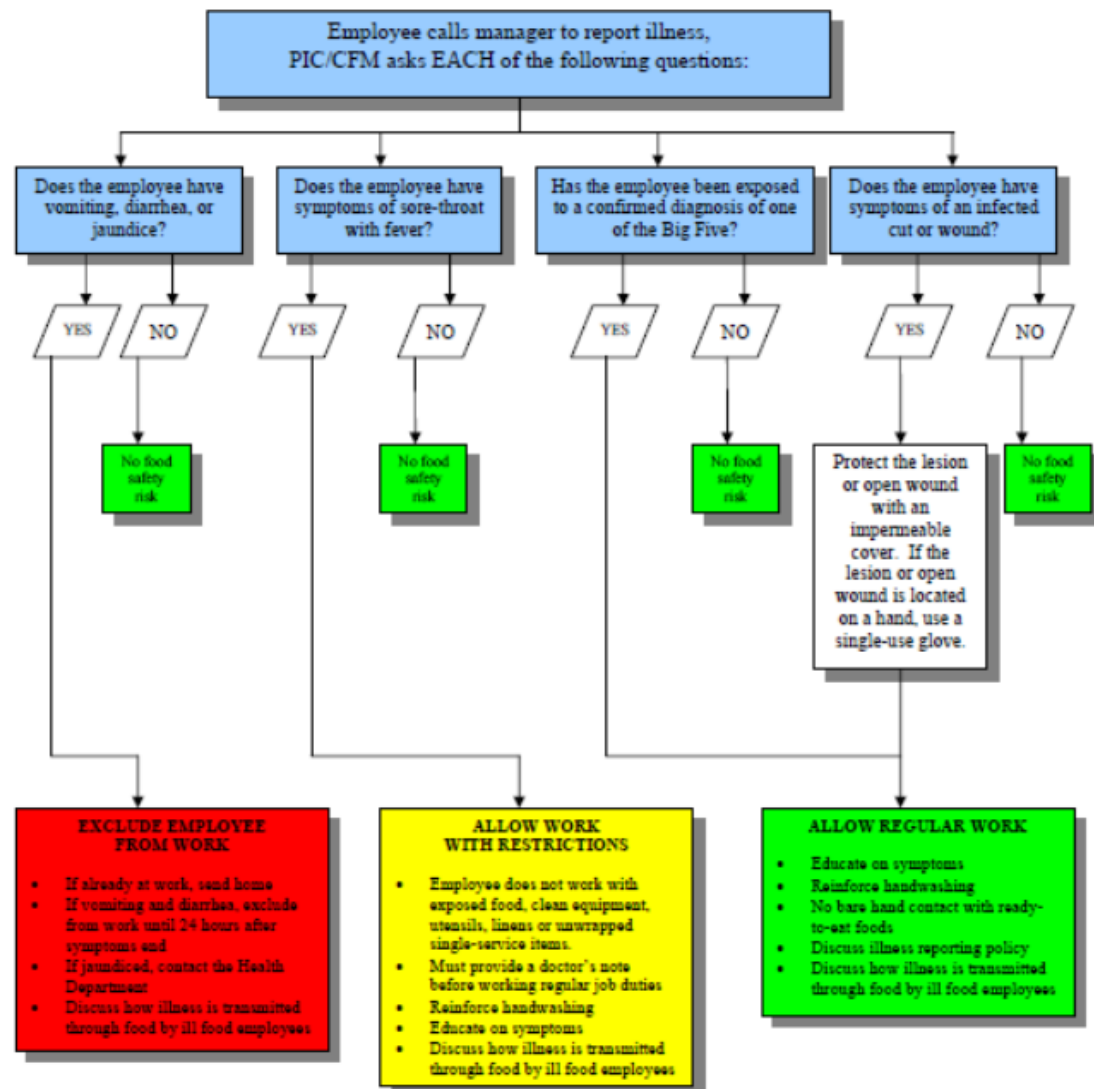
- 1) The manager must make a decision if an employee tells the manager he/she is sick with symptoms of foodborne illness.
- 2) There are four (4) blue boxes at the top of the page with a question in each box.
  - a. Manager must ask all four questions.
  - b. Lines lead from the blue boxes to Yes or No answer boxes.
  - c. If the answer to the question in the blue box is "Yes", the manager must make a decision whether to let the employee come to work.
  - d. The "Yes" box has a line that leads to the decision the manager must make depending on the question that was asked.
    - i. The decision boxes are red, yellow and green. **Red** means the employee must be **EXCLUDED** – he/she cannot come to work
    - ii. **Yellow** means the employee must be **RESTRICTED** – he/she can come to work but they cannot do anything that gets them close to food or food-contact surfaces – no food preparation, no dishwashing, for example. They probably will not work in the kitchen at all. If your restaurant is not large enough for an employee to do other things than prepare food, you may decide to tell the employee to stay home.
  - e. If the answer to the question in the blue box is "No", all lines lead to a green decision box. The employee may come to work as usual. However, the manager should take the time to review the symptoms of foodborne illness again with the employee.
- 3) The large blue box at the bottom of the page has one more important piece of information in it. If an employee is told by a doctor that he/she is sick from **Norovirus**, **E. coli O157:H7**, **Shigella**, **Hepatitis A virus**, or **Salmonella Typhi**, you must call the Fairfax County Health Department. There are specific steps to get the employee back to work. The health department will explain those steps.





### Employee Illness Decision Guide for PIC/CFM (non-HSP)

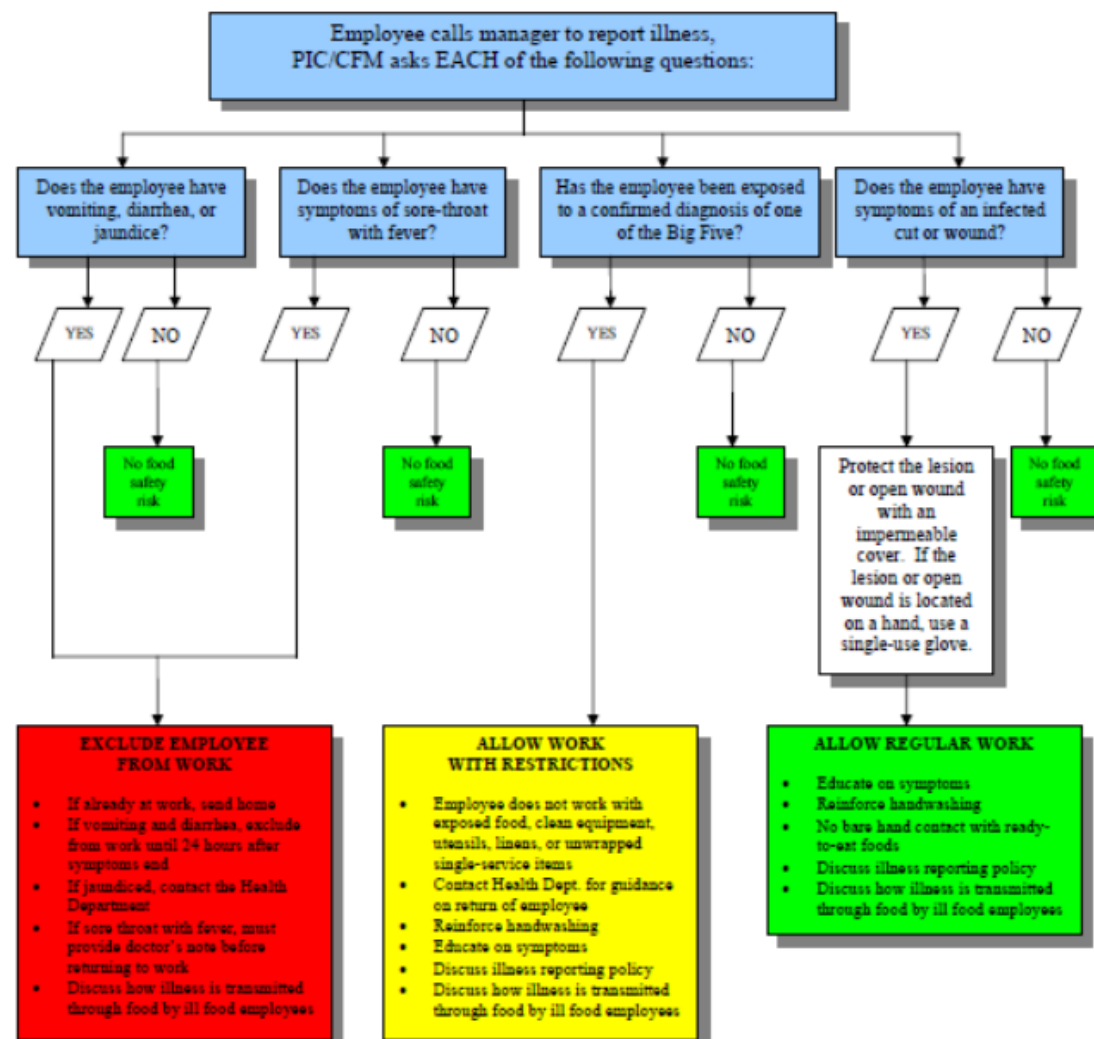
Use this flow chart to determine if an employee with an *undiagnosed* illness can spread the illness through food and should be restricted or excluded from work.



If a food employee reports a diagnosis of **Norovirus, E.coli O157:H7, Shigella, Hepatitis A virus, or Salmonella Typhi**, immediately exclude the employee and contact the Fairfax County Health Department, Food Safety Section at 703-246-2444 for guidance.

### Employee Illness Decision Guide for PIC/CFM (HSP)

To be used for employees working with a **highly susceptible population**, including nursing homes, adult day health care, child day care or elementary school. Use this flow chart to determine if an employee with an *undiagnosed* illness can spread the illness through food and should be restricted or excluded from work.



If a food employee reports a diagnosis of **Norovirus, E.coli O157:H7, Shigella, Hepatitis A virus, or Salmonella Typhi**, immediately exclude the employee and contact the Fairfax County Health Department, Food Safety Section at 703-246-2444 for guidance.

# Tools and Resources

- Handouts; multiple languages (Arabic, Chinese, English, Farsi, Hindi, Korean, Spanish, Thai, Urdu, Vietnamese)
- Web page PPT slide show
- Newsletter- 1/12, 4/12



# Evolution of the Program

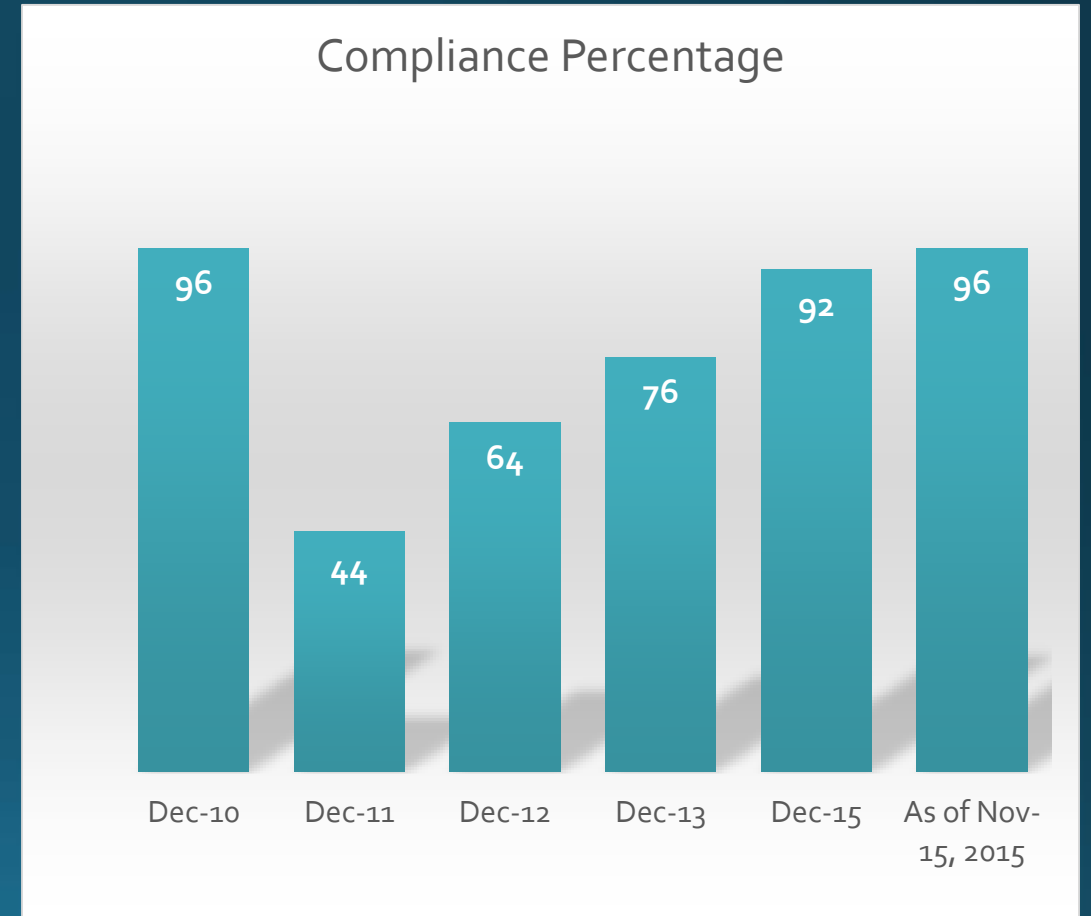
- Time spent up front has paid off
- EHS staff are able to effectively assess compliance status of employee health policy requirements
- Employee Health Policy is a recognized concept in Food Service Establishments

# Summary

- Identified the issue
  - Assessed the challenge and identified opportunities for improvement
- Provided training to staff regarding employee health policy (EHP) requirements
- Provided resources to staff to assist in the assessment of employee health policy compliance (Decision Tree)
- Created resources for Food Service Establishments to use in the creation of their own EHP and provided on-site training
- Followed-up with FSEs at each inspection

# Employee Health Policy Initiative, Stats

- December 2010- 96% In Compliance
- December 2011- 44% In Compliance
- December 2012- 64% In Compliance
- December 2013- 76% In Compliance
- December 2014- 92% In Compliance
- As of November 17, 2015- 96% In Compliance



# Questions?