Three Health Inspectors Walk Into a Bar

Utilizing peer review quality assurance practices to achieve consistency

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Food & Drink | Health | Local News | Northwest

Chipotle E. coli cases continue to rise in Washington

Originally published November 4, 2015 at 2:13 pm | Updated November 6, 2015 at 7:23 am

Health | Local News

Salmonella cases tied to pork jump to 90

Originally published July 31, 2015 at 3:02 pm | Updated July 31, 2015 at 8:58 pm

Salmonella cases in Washington state

A team from the federal Centers for Disease Control and Prevention is coming to Washington state to help investigate an outbreak of salmonella infections apparently linked to eating pork. The number of cases has risen to 90.

Counties with salmonella cases linked to eating pork



Source: Washington Department of Health MARK NOWLIN / THE SEATTLE TIMES

YOU HEARD IT HERE FIRST: CHANGING OUR FOOD BORNE ILLNESS PUBLIC NOTIFICATION PROCESS

November 13, 2015. Reading time 8 minutes.



FOODBORNE ILLNESS INVESTIGATION UNDERWAY: A THIRD CASE OF ICE CREAM-RELATED LISTERIA IN 12 MONTHS

December 9, 2015. Reading time 14 minutes.



Public Health is investigating a case of Listeria infection that is linked to two cases identified last year. In all three cases the patients with highly weakened immune systems consumed milkshakes at the University of Washington Medical Center

change.org



"Had I known how poorly the restaurant performed, I wouldn't have eaten there, and I would have never gotten sick."

2,000 +

signatures

Petitioned Councilmember Joe McDermott ~

Responded

Create clear restaurant inspection ratings & improve access to ratings.

King County launches new Food Safety Rating System in January, 2017





Why does consistency matter?

When asked why consistency matters, here is what Food & Facilities staff said:



Fudging the Nudge: Information Disclosure and Restaurant Grading

Daniel E. Ho

122 Yale L.J. 574 (2012).

One of the most promising regulatory currents consists of "targeted" disclosure: mandating simplified information disclosure at the time of decisionmaking to "nudge" parties along. Its poster child is restaurant sanitation grading. In principle, a simple posted letter grade ('A,' 'B,' or 'C') empowers consumers and properly incentivizes restaurateurs to reduce risks for foodborne illness. Yet empirical evidence of the efficacy of restaurant grading is sparse. This Article fills the void by studying over 700,000 health inspections of restaurants across ten jurisdictions, focusing on San Diego and New York. Despite grading's great promise, we show that the regulatory design, implementation, and practice suffer from serious flaws: jurisdictions fudge more than nudge. In San Diego, grade inflation reigns. Nearly all restaurants receive 'A's. In New York, inspections exhibit little substantive consistency. A good score does not meaningfully predict cleanliness down the road. Unsurprisingly, New York's implementation of letter grading in 2010 has not discernably reduced manifestations of foodborne illness. Perhaps worse, the system perversely shifts inspection resources away from higher health hazards to resolve grade disputes. These results have considerable implications, not only for food safety, but also for the institutional design of information disclosure.



Daniel E. Ho Professor of Law, Stanford University

Key findings:

- One inspection does not predict the next
- Grade inflation
- Consistency is a challenge across all forms of regulatory enforcement

Could conducting peer reviewed inspections to improve inspection quality and consistency?

- Ground rules
- A full day of inspections
- Inspections in neither inspector's area
- Assign one inspector as lead, then alternate
- Full service establishments

Peer Review Process

Part 1

- Peer Review Inspections and group huddles
- Independent Inspections
- Qualitative findings

Part 2

Huddle Process






















































































Qualitative Reactions

"It is good to know what tools people . . . have in their tool boxes. Some . . . have a hammer and that is all they use . . . A] conversation about the tools of the trade . . . will help."



Qualitative Reactions

"[A] good inspector should know . . . cooking, HVAC, plumbing, people skills, psychology, project management, construction materials, mechanics, proper cleaning techniques, etc."



Qualitative Reactions - Unanticipated Benefits



Qualitative Reactions - Unanticipated Benefits



"I learned a faster way to get to my area by taking a different road."

Qualitative Reactions - Unanticipated Benefits



"Not understanding a word . . . gave me a greater appreciation of ESL difficulties"

Qualitative Reactions

- "Some people think alike and others think differently. I find that I learn more from people who think differently if I am willing to listen."
- "[M]y peer's mellow approach . . . will help diffuse confronting situations."
- "[A]n imperative tool in helping me be a better inspector. . . It also helps me value my profession more, which is a godsend."
- "Seeing the other person do their inspection helped highlight where my weaknesses are -- very interesting and is helping me to do better inspections!!! VERY COOL!!!"
- "Irrespective of study outcome, this project will have made me better and more effective at what I do."

Takeaways

- Improved sense of team cohesion and sharing of knowledge
- Process for identifying challenges
- Increased consistency



Recreation of the Peer Review Huddle Process

Components of peer review learning





Time As A Public Health Control Session Activity

• What is the key point of the highlighted section of the code?

• Does the inspector have discretion?

 If yes, what discretion does the inspector have?

The Five Required Concepts for Time as a Control

Key Concept 1	Key Concept 2	Key Concept 3	Key Concept 4	Key Concept 5
Working Supply				Disposition
or	Written	Start Time (41°F	Food Marked	(cooked & served,
RTE for	Procedures	or 135°F)		served, or
Immediate				discarded within
Consumption				4 hours)
		+	Same	با
Discretion	Discretion	Discretion	Discretion	Discretion
No Discretion.	Some Discretion	No Discretion on	No Discretion on	No Discretion.
	as to the detail	concept.	concept.	
May not use	provided in the			
Time as a Control	procedures.	Some discretion	Some discretion	
for other		on how to	on how food is	
situations.		validate.	marked or	
			identified.	

Chicken is held in a hot case at 120°. The PIC says they are using the 4-hour rule. There are no written procedures. It is unclear what the start temperature of the chicken was. There is not a discard time marked.

Working Supply	Written	Start Time	Food Marked	Disposition	Level of
or RTE for	Procedures?	(41°F or 135°F)		(cooked &	discretion and
Immediate				served, served,	how to
Consumption?				or discarded	document
				within 4 hours)	
					No Discretion
					OUT
					Document in
					violation notes

Various meats are fully cooked and then held on the counter next to prep table. All containers of meat are marked with a 4 hour discard time right after cooking. Upon order, meats are combined with other ingredients, reheated, and served. In what you observe, there are no meats left over. You ask the PIC what happens when there is meat leftover, and she tells you it is discarded. The PIC says they are using Time as a Control, but is not able to find the written procedures. This is the first time we have found them using Time as a Control.

Working Supply or RTE for Immediate Consumption?	Written Procedures?	Start Time (41°F or 135°F)	Food Marked	Disposition (cooked & served, served, or discarded within 4 hours)	Level of discretion and how to document
					Some Discretion Could mark as IN
					Include in notes need for written procedures by next inspection.
					Follow up during next inspection

High school cafeteria has an unrefrigerated salad bar. Most of the potentially hazardous foods are taken directly from the walk-in cooler and placed into the salad bar. Canned beans that have been stored at room temperature are opened and placed into the salad bar. Foods are put out at 11 AM and lunch is over at noon. All left-over foods on salad bar are discarded. Written procedures are posted on the wall.

Working Supply	Written	Start Time	Food Marked	Disposition	Level of
or RTE for	Procedures?	(41°F or 135°F)		(cooked &	discretion and
Immediate				served, served,	how to
Consumption?				or discarded	document
				within 4 hours)	
					No Discretion
					OUT
					Include in notes
					that food must
					start at correct temperature.
					Follow up during next inspection

Packaged grated cheese is removed from refrigeration and marked with a 4 hour discard time. The cheese is placed next to the cook-line and used to make quesadillas as they are ordered. They make a lot of quesadillas – you see them go through a package and bring out another one from the refrigerator that they mark with a 4 hour discard time. Written procedures are available that reflect this process.

Working Supply	Written	Start Time	Food Marked	Disposition	Level of
or RTE for	Procedures?	(41°F or 135°F)		(cooked &	discretion and
Immediate				served, served,	how to
Consumption?				or discarded	document
				within 4 hours)	
					Some Discretion
					IN
					Mark in
					comments
					appropriate TAAC
					process being
					used and is
					documented.

Wraps are prepared, packaged, and placed in the refrigerator overnight. In the morning, they are labeled with a 4 hour discard time and then placed on a grab-and-go table. Wraps that have exceeded the 4 hour time mark are still on the grab-and-go table. The PIC has written procedures available in the office.

Working Supply	Written	Start Time	Food Marked	Disposition	Level of
or RTE for	Procedures?	(41°F or 135°F)		(cooked &	discretion and
Immediate				served, served,	how to
Consumption?				or discarded	document
				within 4 hours)	
					No Discretion
					Out
					Include in notes food not discarded as required.
					Follow up during next inspection
Questions or comments?

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Staff time with in Peer Review

Workforce Development	Prior professional development (based on 2080 hrs)	Integrating Peer review	Difference
Workforce development - Staff meetings (monthly all staff, 4x all staff)	40	36	Monthly staff meetings (3 hours - assumes some drive time)
Workforce development (committees - seek employee input on service improvement and provide leadership opportunities)	12	12	
Workforce development - standardization and quality assurance	48	96	Days conducting peer review
Workforce development - Training received (2 days DOH, 3 additional)	40	40	
Workforce development - Providing training to other staff	5	5	
Total	145	189	44.00
Percentage of year	7%	9%	2%