

## Clear as Day Clear as Mud



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Meanwhile at an unsuspecting restaurant.....  
I speak "inspector"

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## "I speak *INSPECTOR*" Video



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## Clear as Day?

DOH	OUT	NONC
FBI	ROP	GRP
RISK	HACCP	ASEPTIC
HEP A	MAP	RETORT
PIC	SSOPs	TRDs
EHP	COOL	RETAIL
CFPM	P	SPA
CONTROL	PF	PC
RIR	OOB	PA LETTER
RCP	PUBLIC PORTAL	AFDO
TEMPED	CA	SME
PROBED	VD	PMO
TCS	RIR	PC

**OMG!**

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## CLEAR AS MUD

Course Facilitator  
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## Clear as Day or Clear as Mud?

- Jargon is **CONFUSING!** Clouds the message
- Acronyms are only good if you know them
- What **MESSAGE** are your words painting?



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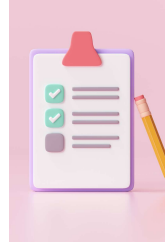


## Objectives

- Understand the components of a great citation/violation **enhancement**
- Write **enhancements** in a clear, concise, factual, and responsible statement
- Verbal Communication critical for compliance


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## The Enhancement




- A regulatory note, statement, remark, in your own words
- **Clearly** states what was observed
- A **concise** statement
- Includes the **facts**
- Provides **responsibility** - how public health was protected (when applicable)

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## POLL QUESTION




What components should be part of an enhancement?  
(select all that apply)

- A. Where the problem was observed
- B. Just the facts
- C. Who was involved in the violation
- D. The name of the Person in Charge
- E. Corrective Actions
- F. The time of day



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## Enhancement Components



- Clear
- Concise
- Factual
- Responsible
- Creates a mental image
- State corrective actions taken (as necessary)

Old dried food residue was observed on the spoon at the display for self-service boiled peanuts. A clean utensil was provided. The dirty utensil was removed and placed in the ware wash sink.

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## Clear? Concise? Factual? Responsible?



Food prep area: cornbread stored in oven had mold-like build up on it. COS: owner voluntarily discarded.


Observed large purse under prep table in the dessert room, also observed open sodas stored inside of ice machine.

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## Clear and Concise

**Clear:** The act of making a statement definite, or distinct. Unambiguous, simply stated.

**Concise:** Brief in form but comprehensive in scope, succinct.



Meat department area; live crawling roaches throughout location.

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## Factual

**Factual:**  
restricted  
to or based  
on fact

**Utensils were not provided for customers at self-serve bakery case.** A clean utensil must be provided for customer use to protect food from contamination.



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## Responsible



- Independent decision-making or involving important duties
- Having an obligation to do something
- Corrective actions taken, COS



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## Get Rid of the Fluff and Stuff

Employee was washing utensils and there was **no sanitizer** in ware wash sink sanitizing compartment, the container for sanitizer dispenser was **empty** and employees are **using equipment** after ware washing and coming out designated sanitizer sink. The manager instructed an employee to reload the **sanitizer dispenser** with a new container of **sanitizer** and ware washing **was resumed**.

**No sanitizer** in container at the ware wash sink. **Observed** employees using **unsanitized** equipment. An employee **reloaded** the dispenser with sanitizer and the unsanitized equipment was **removed** from use to the ware wash area.



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## Trim It Down

**Walk-in cooler- raw egg yolks** on an uncovered plate found **stored on top of white cheese** inside of the walk-in cooler. To correct the violation, the **egg yolks** were **moved to an appropriate location** inside the walk-in cooler on a shelf below the cheese.

Raw egg yolks stored **above** cheese in the walk-in cooler. Corrective Action: Egg yolks were **moved** below ready to eat foods.



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## POLL QUESTION

Chicken recently prepared not cooled to 41°F or below prior to placing product into a retail display case.

(select all that apply)

- A. Clear
- B. Concise
- C. Factual
- D. Responsible
- E. All of the Above

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## POLL QUESTION

Chicken breast cooked 6 hours prior was not cooled to 41°F or below prior to packaging product for storage in retail display case. The chicken was discarded. Cool foods rapidly to 70°F within 2 hours and then to 41°F or below within 4 hours to maintain safety.

(select all that apply)

- A. Clear
- B. Concise
- C. Factual
- D. Responsible
- E. All of the Above

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## The Ideal *Enhancement*



- Objective and factual
- Impartial and unbiased
- Contain no personal views or opinions
- **Free Jargon** (Temped, Probed, Matrix, etc.)
- **Acronyms** (PIC, FBI, RCP, BHC, DOH, etc.)
- Provides corrective actions

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## SO WHAT?!

- Your words make a big impact
- Summary of violation
- Provides historical chain of events
- Communicate compliance issues to the food establishment

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## Corrective Action

Action taken by establishment

To protect public health

To stop the objectionable condition

Based on valid practices/science

**CLOSE THE LOOP!**  
Finish what you started



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## CLOSE THE LOOP!

Internal temperature of chicken wings on a rack by the oven was 52°F.

Corrective Action: products were moved to proper refrigeration.

OR

Corrective Action: Wings relocated to the reach in cooler as the food was above 41°F less than 4 hours.

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## Perception = Reality

- What you don't write is important
- Use your wit - don't OMIT
- What the owner / public reads is perceived to be the final outcome

**CLEAR AS DAY!**



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## Be Sure To...

Emphasize the So What!?


Close the loop!  
Finish what you started

Keep it Simple your audience does not speak food safety

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## The Audience



- Legal staff (enforcement, lawyers, courts)
- Regulatory Partners (FDA, DOH, others)
- Industry Partners and Associations
- Media
- Consumer Groups

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## Public Access





- INSPECTION REPORTS online
- Transparency
- Perception

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## POLL QUESTION



Does your agency post inspection reports online?

A. YES  
B. NO

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## THE JARGON TRAP

And Scary Antonyms too!

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## PROBED

To physically explore or examine (something) with the hands or an instrument





OR

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## PROBED

Probes indicate rice and coleslaw at 55°F and 53°F on cooler shelf.



OR

*Observed beef empanadas and beef patties between 110 °F - 121 °F when checked with a **calibrated metal stem thermometer** inside hot case.*



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**TEMPED**

Pot of chili cooling from day before in walk in cooler **temped** at 72°F. COS-Product was voluntarily destroyed.

**TEMPERATURE****OR**

*Internal temperature taken with a probe thermometer of pot of chili cooling from day before in walk in was 72°F. Corrective Action: Product was voluntarily destroyed.*

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**Acronyms**

Observed **CC** in **WIC**  
 The **PIC** was not **CFM**  
**FBI** Investigation  
**BHC** with **TCS**  
**HACCP** for **ROP**

**Clear & Concise ≠ Abbreviated**

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**ENHANCEMENT RECAP**

CLEAR & CONCISE	IMPARTIAL/UNBIASED
TRIM IT DOWN	NO OPINIONS
FACTUAL	OBJECTIVE
RESPONSIBLE	FREE OF JARGON
NO FLUFF AND STUFF	K.I.S.S.
<b><u>CLOSE THE LOOP!</u></b>	

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***"A picture is worth a thousand words, but it's the words that really tell the story."***

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**Clear as Day    Clear as Mud****POLL QUESTION**


Employee observed rinsing hands with only water and then drying hands on apron and pants before returning to cutting bread.

- A. CLEAR as MUD  
 B. CLEAR as DAY


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## POLL QUESTION



Employee observed rinsing hands with only water and then drying hands on apron and pants before returning to cutting bread.  
**Corrective Action: Spoke to owner about proper handwashing. Bread was discarded**

A. CLEAR as MUD

B. CLEAR as DAY

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## Verbal Communication

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- Not just written inspection reports
- Understanding what we say
- Terminology
- Jargon
- Acronyms
- Culture, education, experience
- Familiarity

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## Familiarity


Environmental Manager  
David Marshall of the  
Florida Department of  
Agriculture and Consumer  
Services Retail Food  
Program

- Mr. David Marshall
  - David Marshall
    - David
    - Dave



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Dave




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## Familiarity

*Clostridium botulinum*

- C. botulinum*
  - C. Bot*
    - Bot Tox
- Botulism
- Potentially deadly toxin



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### *Clostridium botulinum*

- We say "*C. bot*"
- Do they hear "Sea Bot?"

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### Communication Mishaps



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### Employee Illness Policy



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Mumbo Jumbo



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### Pocket Story



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### Objectives RECAP

- Understand the components of a great citation enhancement
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**QUESTIONS?**

Thanks for attending!