



Risk Based Food Inspections Are Coming!

Logan County Department of Public Health (LCDPH) will begin utilizing the Food and Drug Administration (FDA) Model Food Risk Based Inspection System that was adopted by the Illinois Department of Public Health. This system will help conform to State standards and create more uniformity in inspection. The goal of the system is to clearly, concisely, and fairly present the compliance status of the establishment and to convey compliance information to the permit holder or Person in Charge (PIC) at the conclusion of the inspection. The new inspection tool laces all violations in to two categories: (1) Foodborne Illness Risk Factors and Public Health Interventions and (2) Good Retail Practices. There are 29 Foodborne Illness Risk Factors and Public Health Interventions (violations 1-29) and 28 Good Retail Practices (violations 30-57) on the inspection form.



Types of Violations

Foodborne Illness Risk Factors and Public Health Interventions

Risk Factors are important practices or procedures identified as the most prevalent contributing factors of foodborne illness or injury. Public Health Interventions are control measures to prevent foodborne illness or injury. Attempts shall be made to correct all Risk Factor violations at the time of inspection. Follow-up inspections on any items that cannot be corrected will be outlined in the Logan County Food Enforcement Policies and Procedures.

Epidemiological outbreak data repeatedly identify five major risk factors related to employee behaviors and preparation practices in retail and food service establishments as contributing to foodborne illness.

- Improper holding temperatures
- Inadequate cooking, such as undercooking raw shell eggs
- Contaminated equipment
- Food from unsafe sources
- Poor personal hygiene

The Food Code addresses controls for risk factors and further establishes 5 key public health interventions to protect consumer health:

- Demonstration of knowledge
- Employee health controls
- Controlling hands as a vehicle of contamination
- Time and temperature parameters for controlling pathogens
- The consumer advisory

Good Retail Practices

Good Retail Practices (GRPs) are methods used to control basic operational and sanitation conditions in an establishment that, if not controlled, could lead to a foodborne illness. These are preventative measures to control the pathogen, chemical, and physical contamination of food.

Priority and Priority Foundation Items

A priority item is denoted in the FDA Food Code with a superscript P (^P). They are items with a quantifiable measure to show control of hazards such as cooking, reheating, cooling, and handwashing. A Priority Foundation item supports, facilitates, or enables one or more Priority Items. They are denoted in the FDA Food Code with a superscript Pf (^{Pf}). They are items that require purposeful incorporation of

specific actions, equipment, or procedures by industry management to attain control of risk factors that contribute to foodborne illness or injury. Depending on the complexity of the corrective action, a Priority or Priority Foundation item must be corrected at the time of inspection or within 72 hours for Priority Items, or no longer than 10 calendar days for Priority Foundation Items.

Core Item

Any provision in the Code that is not labeled as a Priority or a Priority Foundation item is designated as a Core item. They are items that relate to the general sanitation, operational controls, facilities and structures, equipment design, or general maintenance.

Repeat Violations

A Repeat Violation is any violation noted during the previous routine inspection that is also noted during the current inspection. It must be the same violation to be counted as a repeat violation. While an initial GRP violation does not contribute to an establishment’s grade, a repeat GRP violation does.

The Grading System



The LCDPH Food Inspection System will no longer use a 100 point demerit scoring system. We will be rating the inspection as Pass, Pass with Conditions, or Fail. Ratings are based on a combination of Foodborne Illness (FBI) Risk Factors and Repeat Violations. Good Retail Practices only contribute to the rating when it is a repeat violation. Please see the rubric below.

Count of Violation(s)		Repeat Violations		
		0-5	6-10	11+
FBI Risk Factors	1-3	Pass	Pass with Conditions	Fail
	4-5	Pass with Conditions	Pass with Conditions	Fail
	6+	Fail	Fail	Fail



New Requirements

Person in Charge

The establishment must designate a Person in Charge (PIC) and ensure that the PIC is present during all hours of operation. This is separate from the requirement for Certified Food Managers. The PIC must be able to demonstrate knowledge of foodborne disease prevention, application of the HACCP principles, and requirements of The Code.

Employee Illness Reporting

Establishments must have a policy that requires employees to report information about their health and activities, to the PIC, as they are related to diseases transmissible through food. Employees must report the following:

- Symptoms including vomiting, diarrhea, jaundice, sore throat, and fever
- Illnesses diagnosed by a health care professional including Norovirus, Hepatitis A, Shigella, Shiga toxin-producing E. coli, or Salmonella
- Exposure to Norovirus, Hepatitis A, Shigella, Shiga toxin-producing E. coli, or Salmonella

The PIC is required to report to the local Health Authority within 24 hours, any employee that is jaundiced or any employee diagnosed with Norovirus, Hepatitis A, Shigella, Shiga toxin-producing E. coli, or Salmonella. The PIC is required to ensure that any employee who exhibits or reports the listed symptoms, or who is diagnosed with a listed illness, is excluded or restricted from food handling.

Vomit and Diarrhea Event Clean Up Policies

Food Establishments are now required to have procedures for employees to follow when responding to vomiting or diarrheal events in the food establishment. The Center for Disease Control has developed sample guidelines for clean-up and disinfection of vomit and diarrhea accidents. These guidelines can be found on the Illinois Department of Public Health website and are available at the LCDPH office.

Handwashing Signs

Establishments must have a sign or poster, visible at all times, that notifies food employees to wash their hands at ALL handwashing sinks used by food employees. Signs are available for download on the FDA and Illinois Department of Public Health websites.

Hair Restraints

Food employees must wear hair restraints such as hats, hair coverings, or nets, beard restraints, and clothing that covers body hair to effectively keep hair from contacting exposed food, clean equipment, utensils, unwrapped single service articles, and linens. The only employees exempt from this are counter staff who only serve beverages and prepackaged foods, hostesses, and wait staff that pose minimal risk of contamination.

Temperature Violations

Temperature violations on the “old” inspection form were combined into a few violations. Temperature violations are now divided into more precise categories. It is good to note that the required temperatures are still the same.

“Old” Inspection Report	“New” Inspection Report	
#3 Food at proper temperatures	#12 Food received at proper temperature #18 Proper cooking time and temperatures #19 Proper reheating procedures for hot holding #20 Proper cooling time and temperature	#21 Proper hot holding temperatures #22 Proper cold holding temperature #34 Plant food properly cooked for hot holding
#4 Facilities to maintain product temperatures	#33 Proper cooling methods, adequate equipment for temperature control	
#6 Proper thawing	#35 Approved thawing methods	