

Cross Contamination Verification

Perhaps you're the owner of a successful restaurant, or maybe you're even the Certified Food Manager for your business. You know how to create successful policies and train your employees. So why did you still get a cross contamination violation?

It's probably time to verify that your establishment's cross contamination policy is being followed.

First of all, what is verification, and how do you verify that your cross contamination policy is being followed?

Verification is the periodic validation of food safety procedures. Use your verification process for feedback on whether you need to retrain employees or modify your policy.

As you create a verification process to ensure your cross contamination policy is being followed, ask yourself these important questions:

How do you verify that policies and training are being followed?

Do you write anything down during your verification step?

Do you have logs?

Do your logs include monitoring of all food storage areas?

Are you verbally testing your staff?

Do they know how to properly separate raw animal food from ready-to-eat (RTE) food? Do they know how to store raw animal food based on their final cooking temperatures? Do staff know which utensils are used for raw animal food vs. RTE food?

Are you watching your employees to determine if they are following policies?

How frequently? In which areas of the kitchen? Do employees look out for each other so they can succeed as a team?

If a job is assigned to a mid-level employee, are you following through to ensure that they are doing their job, especially during busy times?



How often do you verify that your policies are followed?

Do you check logs daily? Weekly? Frequent verification is helpful to ensure that prompt feedback can be given.

What do you do if a policy is not being followed properly or an item is found to be out of compliance?

Use areas of non-compliance to provide targeted training for your staff.

How do you document corrective actions?

Completing the AMC Cycle for Continual Improvement

When you find areas of non-compliance in your establishment, such as employees not properly storing food in the walk-in cooler, try to determine the root cause. Was it because your employees need additional training? Or can you adjust your policy to make it more complete?

Think about how you can prevent this issue from happening again.

Was it a problem with the...

Policy?	Or Training?
Insufficient storage space to separate food	Employees are not separating raw animal food from RTE food
Non-latex gloves are not part of procedure to avoid bare hand contact with RTE food	Employees are not using gloves or utensils to avoid bare hand contact with RTE food
Sneeze guards are not used to protect self-service food items	Employees are not storing self-service utensils with the handles facing out
Instructions for preparing raw animal food are incomplete or missing	Employees are using the same equipment to prepare raw animal food and RTE food without cleaning and sanitizing between uses

If the issues are related to an incomplete policy, then you may wish to consider these steps.



Sometimes you may want to write a completely separate policy. For example, instructions for separating food for storage are different than separating food during preparation. You may want to have a separate policy with clear instructions for each process to avoid any confusion.

If the issues are related to training, then you may wish to think about these interventions.

Staff may need additional training in a particular area. Remember to provide feedback to staff quickly, so that bad habits are not formed.

Who is failing to follow policies? Maybe your training has focused on new staff, and your senior staff may need a refresher training.

Perhaps you need to have more frequent food safety check-ins or training. Brief, frequent trainings are more effective than a one-time lecture on food safety.

You may want to focus a training on corrective actions. Sometimes staff see a problem but do not take action because they think that it is someone else's responsibility. Or your staff may not feel that they have the authority to take action on a particular issue. For example, a new employee may think they are not allowed to remind their peers how to properly store food, when applicable. Be sure that you explain your corrective action process to staff, for example, explaining that food protection is a team effort and success requires reminders from the entire team.

Do your employees know who to ask when they have a cross contamination question? Be sure that there is someone available for food safety questions on every shift.

The last part of a verification process for managers is to review verification documents and logs to look for patterns and problem areas. These may be times of day when food is put back into storage or during the morning food preparation shift when raw and RTE food are being washed and prepped. Use insights from your review to suggest changes to your food safety team, and modify your cross contamination policy.





A Retail Food Service Manager's Guide

To summarize, here are the key steps to consider with any verification process:

- **Use your verification process for feedback about whether your policy is being followed**
- **Implementing logs works well to verify that your systems are working**
- **When you identify problems, quickly provide feedback to staff**
- **Regularly review logs and verification results to look for patterns and problem areas**
- **Look for the root cause of issues that you identify. Was it policy or training related?**
- **Modify policies or schedule additional training based on information you gather during your verification step.**

Remember, after making changes to your cross contamination policy, be sure to retrain your employees. You may wish to reread the Manager's Guide to Creating a Policy, and the Manager's Guide on Training your Employees.

