

Long-Term Care Survey Alert

Survey Management: Expect Surveyors To Scour Your Food Sanitation Practices

Get up to speed to beat serious F371 citations under the tougher survey guidance.

If you tend to think "kitchen" when you hear F371, your facility may be wide open to citations on its next inspection. The revised survey guidance for this tag encompasses all aspects of food sanitation -- and so should your facility to prevent food-borne illness and keep a clean survey record.

What's at stake: "Not only are elderly people at high risk for food-borne illness, but if they get it, one-fifth of them die from it," cautions **Annette Kobriger, RD, CD, MPH, MPA**, president of **Kobriger Presents** in Chilton, WI. And "the scope and severity of deficiencies in the area of sanitation tend to run pretty high," she cautions.

The Centers for Medicare & Medicaid Services has deleted tag F370 and incorporated that guidance in F371.

To ensure compliance, ask this key question: "Has the SNF prepared, stored and served food safely to prevent food-borne illness?" suggests **Brenda Richardson, MA, RD, LD, CD**, a nutrition expert in Pekin, IN. Below, experts share strategies to combat common gaps in food safety at each step of the process.

1. Clean and store fresh produce correctly. Wash each piece of fresh produce separately using running water of about the same temperature as the produce. If the tomato or pepper, for example, is cold, use cold water -- if the produce is room temperature, use water of that temperature, advises **Julie Albrecht, PhD, RD**, a food specialist with the **University of Nebraska-Lincoln**. You don't want a large temperature differential, which can force microorganisms inside the produce, especially around the stems or in any cracks or cuts, she warns.

Beware: Tomatoes and melons have been heavily involved in outbreaks of food-borne illness, Albrecht says. But you can avoid that problem by refrigerating them after you cut them.

Reasoning: When you cut them, the microorganisms on the surface or knife can enter the produce where they multiply at room temperature, she warns.

2. Avoid cross-contamination. Staff needs to clean blenders after pureeing food, for example, says Kobriger. And when preparing raw chicken, they should clean a surface with hot soapy water before cutting up the salad on that surface, as an example, says Albrecht.

Multi-tasking can cause food safety problems such as the aforementioned ones, if staff isn't careful. "Sometimes we have one person doing four to five tasks," which provides "a lot of opportunity for cross contamination" and mistakes, says **Reta Underwood**, a long-term care and survey consultant in Buckner, KY.

3. Know the handwashing rules. Dietary staff should wash their hands with soap and water thoroughly and then dry them using a clean towel, counsels **Christine Bruhn, PhD**, a food safety expert with the **University of California at Davis**. The safest bet is to use a new paper towel each time, she says.

"Bacteria love moisture and a food source," Bruhn warns, and a damp towel used to wipe your hands or clean surfaces can end up contaminating everything.

Heads up on alcohol cleansers, gloves: The F371 guidance notes that antimicrobial gel (hand hygiene agent that does not require water) cannot replace proper hand washing techniques in a food service setting. Also "failure to change gloves between tasks can contribute to cross-contamination."

Tip: Monitor buffets for contamination. Someone should be on the lookout for people refilling their used plates -- or sticking their fingers in the food, cautions Albrecht.

4. Cook foods to the correct temperature. If residents want runny egg yolks, use eggs pasteurized in the shell, Albrecht suggests.

Heads up: The revised F371 guidance specifically discusses food-borne illness caused by serving sunny-side-up, unpasteurized eggs as a potential example of an IJ-level deficiency.

Microwave tip: When cooking raw animal foods in the microwave, stir and rotate the food during cooking to bring all parts of the food to at least 165 degrees Fahrenheit (F). Allow the food to stand covered for at least two minutes after cooking to obtain temperature equilibrium, the guidance instructs.

5. Don't let the danger zone creep up on you. The "danger zone refers to temperatures above 41 degrees F and below 135 degrees F that allow the rapid growth of pathogenic microorganisms that can cause food-borne illness," according to the F371 guidance. "Potentially Hazardous Foods (PHF) or Time/Temperature Control for Safety (TCS) Foods held in the danger zone for more than four hours (if being prepared from ingredients at ambient temperature) or six hours (if cooked and cooled) may cause a food-borne illness outbreak if consumed."

6. Report signs of a food-borne illness outbreak quickly. In analyzing an outbreak of Norovirus in a Florida nursing home, a county health department found that staff appeared to be transmitting the infection to residents. The agency commended the nursing home administration for gathering case information for the investigation but noted that the outbreak should have been reported much sooner. Read the case study at http://www.doh.state.fl.us/disease_ctrl/epi/Epi_Updates/2002/eu071502.htm#3.

Resource: The **Centers for Disease Control & Prevention** notes that in most cases, healthcare professionals should report food-borne illnesses to their county or city health department. For information on reporting food-borne-illness, go to http://www.cdc.gov/foodborneoutbreaks/reporting_professionals.htm.

Editor's note: See the handy chart on page 87 outlining the major causes of food-borne illnesses and related preventive strategies.