



Public Health
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**Peoria City/County
Health Department**

Risk Control Plan Form and Guidance

(Adapted from the Michigan Department of Agriculture)

Overview: The purpose of this guide is to help food operators, with the help of an Environmental Health Specialist/Practitioner, write a simple, yet effective, Risk Control Plan.

The use of Risk Control Plans for addressing chronic and continuous violations in food service establishments is encouraged and may be utilized to satisfy one of the Peoria City/County Health Department's informal compliance requirements. Benefits of a Risk Control Plan include:

- The plan, developed by the operator, allows the operator to consider all of the options and decide what is best for his/her establishment.
- Input from the Environmental Health Specialist/Practitioner helps to create a team approach to problem solving.
- Creates long-term behavioral changes.
- Restores managerial control over procedures that have the potential to cause foodborne illness.

Definitions:

CDC Identified Foodborne Illness Risk Factors: The practices or behaviors, which have been identified by the Centers for Disease Control through epidemiological data as being the most prevalent contributing factors of foodborne illness or injury. CDC foodborne illness risk factors include:

- Poor personal hygiene
- Food from unsafe sources
- Inadequate cooking
- Improper holding temperatures
- Contaminated equipment

Food Code Interventions: 5 key public health interventions identified by the FDA to protect consumer health.

- Demonstration of knowledge
- Hands as a vehicle of contamination
- Employee health
- Time temperature relationships
- Consumer advisory

Hazard: Any biological, physical, or chemical property that may cause an unacceptable consumer health risk.

Risk: The chance or probability for harm to occur.

Risk-based Inspection: An inspection approach focused on identifying significant behaviors and practices associated with the risk factors identified by the CDC and the Food Code interventions.

Risk Control Plan: A mutually agreed upon plan that is written by the management of the food establishment and approved the Environmental Health Specialist/Practitioner. The plan describes the establishment's management system for controlling the chance of harm to occur.

Uncontrolled Hazard: An unmanaged source of harm.

When to Initiate a Risk Control Plan

For the most part, the routine inspection and inspection report writing process is sufficient to eliminate Food Code violations. Violations are noted and then corrected, or a timeline for correction is established. However, some uncontrolled hazards may become continuous or chronic.

The Risk Control Plan process requires management to analyze the problem and propose a solution. Management is required to implement the plan over a given period of time while keeping records to verify the plan is working. Repeating the desired behavior over a given time period creates good, long-lasting habits.

Types of hazards normally covered under a Risk Control Plan

Typically, Risk Control Plans address uncontrolled hazards that are procedural or behavioral in nature. Virtually any type of procedure needing managerial control ranging from establishment/equipment cleaning and maintenance, equipment monitoring, time/temperature compliance, food handling, employee hygiene, etc. can benefit from a Risk Control Plan.

One-time actions to fix a problem, such as the installation of a vacuum breaker on a hose bib or providing sanitizer test strips are generally addressed by other means.

Elements of a Risk Control Plan

A Risk Control Plan must address:

- The hazard to be controlled
- How the hazard will be controlled
- Who is responsible for control
- What are the critical limits
- What monitoring, corrective actions, and record keeping are required
- The corrective action that will be taken should the critical limit not be met
- The agreed time frame for correction
- How the results will be communicated to the Environmental Health Specialist/Practitioner

Sample Risk Control Plan

A Risk Control Plan does not have to be written using any special form, however, one is provided in this packet for those that wish to use it, along with a guide for completing the Risk Control Plan.

- **Describe the Violation (Risk Factor)/Food Code Section Number (this is often filled out by the Environmental Health Specialist/Practitioner):** This is a brief statement of the hazard. For example, “hamburgers are being cooked to 130 degrees F.” State the code number of the violation observed. Why is this violation a food safety hazard?

*****The following questions should be answered by the Person in Charge (PIC). Assistance can be provided by the Environmental Health Specialist, in person or by phone.

- **Describe the Violation. Why is this violation occurring? Why is it difficult to control this violation? (Uncontrolled Process/Hazard examples can be found at the end of this document)**

The critical limit is the standard for each control measure to be applied for the purpose of eliminating, preventing, or minimizing a hazard. Example: The critical limit for cooling chili is to assure the food temperature goes from 135 degrees F to 70 degrees F within 2 hours, and from 70 degrees F to 41 degrees F within an additional 4 hours.

Knowing that the standard for food safety is to cool chili to 70 degrees within 2 hours, and to 41 degrees in an additional 4 hours, why is the chili not being cooled properly? Is there a problem with the monitoring process? Is there a lack of proper equipment to allow this standard to be met? What is the real issue that exists to prevent this critical step from occurring?

- **How will you Correct the Problem?**

In your establishment, what can be done to assure that the chili will be cooled correctly? What are some approved cooling methods? What are some possible alternatives to cooling chili?

- **Will Staff Need to be Re-Trained? Who Will Train Them?**

When you have figured out how to solve your problem, you must make sure that this plan will be followed to assure long term compliance. Who cooks and cools the chili? Do they understand the new process? Have you trained them to now cool foods properly? Do they understand that this solution is not only for the chili, but for all foods that need to be properly cooled?

- **How Will the corrective Action be Monitored?**

- **Who Will Monitor it? How Often?**

It is important to devise a plan to instruct employees what to do when they observe that the critical limit is not met. Otherwise, the hazard will remain uncontrolled and unsafe food may be served to the public. Many corrective actions are simple. For example, the corrective action to be taken when an employee finds the temperature of a cooked hamburger to be 130 degrees F is “continue to cook until critical limit is met.”

Other corrective actions may be more complex. The operator, for example, may set a critical limit of 38 degrees F for cooler unit air temperature. There may be a series of corrective actions that he/she might want to take when the limit is exceeded:

- (A) Employee responsible for monitoring will notify the manager when the air temperature of a refrigerator reaches 41 degrees F.
- (B) The manager will check the temperature setting of the unit. Adjust if necessary.
- (C) The manager will check the temperature of potentially hazardous food and the unit air temperature within 2 hours.

(D) If the critical limit is not met, transfer the potentially hazardous food to another cooler and call the repair service.

- **Who will Check that the Monitoring was Done? How Often?**

Active Managerial Control is an important component to any risk control plan. Without monitoring, it is impossible to know that food safety issues are being addressed. By putting a plan into place where monitoring occurs at regular intervals, a longer-term correction can occur.

- **What Will be Done if the Correction is not Working to Control the Violation?**

When the Person in Charge discovers a problem with the correction, a new plan should be developed to promote food safety.

- **How will you Communicate the Results to the Environmental Health Specialist/Practitioner?**

To work toward a long term correction, a communication plan should be developed with your Environmental Health Specialist/Practitioner. Sometimes this is as simple as faxing charts (cooling/cold holding/ hot holding/etc.) to the Department weekly for a couple of months. For more serious violations, your Environmental Health Specialist/Practitioner might arrange to stop by the establishment to see if assistance can be provided, or as part of formal compliance requirements.

The Risk Control Plan should be agreed upon by both the Person in Charge (PIC) and the Environmental Health Specialist/Practitioner, creating a plan for long term compliance for the violation.

Uncontrolled Process/Hazard Examples

Uncontrolled Process	Hazard
Supervision	Failure to designate a Person in Charge that is present, knowledgeable, and performs duties
Employee Health	Failure to prevent communicable diseases from being transmitted to food by infected employees
Good Hygienic Practices	Failure to prevent the introduction of foreign objects into food; prevent the possibility of transmitting disease through food
Preventing Contamination by Hands	Failure to prevent the possibility of transmitting disease through food
Approved Source	Presence of pathogenic microorganisms, toxins produced by microorganisms, and/or chemical contaminants
Protection from Contamination - Sanitizing	Failure to destroy pathogenic microorganisms that may remain on a food contact surface after cleaning
Time/Temperature Control for Safety	Cooking/Reheating – Failure to destroy pathogenic microorganisms Cooling/Hot Holding/Cold Holding/ Thawing – Failure to prevent growth of pathogenic microorganisms



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RISK CONTROL PLAN

Food Establishment: _____

Person in Charge/Manager: _____

Address of Establishment: _____

Phone Number: _____

Date Created: _____

To Be Filled Out by the Inspector:

Describe the violation (Risk Factor):

Food Code Section Number: _____

To Be Filled Out by the Person in Charge (PIC) *Use Additional Sheets if Necessary:*

Describe the hazard. Why is this hazard occurring? Why is it difficult to control this hazard?

How will you correct the hazard?

How will the corrective action be monitored? (logs, charts, visual monitoring of staff, etc.)

Who will be responsible to monitor? How often?

Who will check that the monitoring was done? How often?

What will be done if the correction is not working to control the violation?

How will you communicate the results to the Environmental Health Specialist/Practitioner?

Submitted by: _____ **Approved by:** _____

(Person in Charge)

(EHS/P)