

## PROCEDURAL STEP 8

### Keep Records

As the manager of your operation, you may have several duties to perform in addition to making sure that the activities in your food safety management system are being performed at the proper frequency and with the proper method. Documenting these activities provides one mechanism for verifying that the activities were properly completed. While record keeping is voluntary in most retail and food service operations, maintaining documentation of the activities in your food safety management system may be vital to its success. Remember that by keeping records you are going above and beyond what your regulations normally require. Records provide documentation that appropriate corrective actions were taken when critical limits were not met. In the event your establishment is implicated in a foodborne illness, documentation of activities related to monitoring and corrective actions can provide proof that reasonable care was exercised in the operation of your establishment. Records may also show that on-going verification was conducted on the food safety management system. In many cases, your records can serve a dual purpose of ensuring quality and food safety. In order to develop the most effective record keeping system for your operation, you should determine what documented information will assist you in managing the control of food safety hazards. A record keeping system can be simple and needs to be designed to meet the needs of your individual establishment. You do not necessarily need to develop new records to document the actions in the system. Some recorded information like shellfish tags should already be part of your food safety management system, and an additional record may not be needed. Your record keeping system may use existing paperwork such as delivery invoices for documenting product temperature. Many retail and food service establishments have implemented comprehensive record keeping systems without having to generate a mountain of paperwork.

Employees are an important source for developing simple and effective record keeping procedures. You should ask employees how they are currently monitoring CCPs or prerequisite programs and discuss with them the types of corrective actions they are currently taking when a critical limit is not met. Managers are responsible for designing the system, but effective day-to-day implementation involves every employee. The simplest record keeping system that lends itself to integration into existing operations is always best. A simple, yet effective, system is easier to use and communicate to your employees.

Record keeping systems designed to document process rather than product information may be more useful in a retail and food service establishment, especially if you frequently change menu items or products. Accurately documenting processes like cooking, cooling, and reheating provides a mechanism for ensuring that you have active managerial control of risk factors. There are at least 5 types of records that may be maintained to support your food safety management system:

- Records documenting the activities related to the prerequisite programs
- Monitoring records
- Corrective action records
- Verification and validation records
- Calibration records

Once a specific process has been shown to work for you, such as an ice bath method for cooling certain foods, the frequency of record keeping may be modified. This approach is extremely effective for labor-intensive processes related to:

- Cooking large volumes of food where a temperature check of each individual item is impractical
- Implementing a verified process that will allow employees to complete the procedure in a scheduled workday
- Cooling foods or leftovers at the end of the business day

## HACCP Builder – Process Approach Procedures

- Maintaining cold holding temperatures of ready-to-eat, potentially hazardous foods in walk-in refrigeration units

### **Special Considerations Regarding Records**

You are encouraged to periodically obtain feedback from your regulatory authority regarding how well your system is working. You can invite your regulatory authority to review or verify your voluntarily-implemented food safety management system. This allows them the opportunity to offer suggestions for problems that they find in the operation of your system, including discrepancies with the monitoring and record keeping procedures. Remember that the maintenance of records is required in the *Food Code* only in a limited number of cases. When your food safety management system is voluntary, their review of your system is by invitation only and they can only document violations that they *observe* as they would during routine inspections. Records generated in support of a voluntary food safety management systems may not to be used to verify compliance with your regulations unless the records are specifically required by your regulations. An example of when records may be used to verify compliance with your regulations would be the maintenance of shellstock tags. If there is a requirement in your regulations that shellstock tags be maintained in chronological order for at least 90 days, a health inspector may verify this requirement using your records. In contrast, if your health inspector finds documented cases of inadequately cooked or hot held foods being sold to consumers, he or she cannot take regulatory action against you based on the documentation. Documentation of hot holding and cooking, like most processes in your regulations, is probably not required. The fact that you are keeping records of these processes means that you are probably going above and beyond what is required by your regulations. Of course, your health inspector may point out discrepancies and offer recommendations to you in hopes of preventing the problems from happening again. Of course, if during the review of your system evidence is found that a product still in circulation poses a serious health threat to the public, the health inspector may initiate an appropriate regulatory investigation as dictated by your regulatory agency. If it is known by your health inspector or you that a product still on the market poses a health threat to consumers, both of you should play your respective roles to remove the product immediately. This may involve voluntary recall of the suspected products.