City of Milwaukee Health Department
Division of Consumer Environmental Health

SANITATION GRADING SYSTEM


Clean


Separate


Cook


Chill

WORKING TO PROTECT THE HEALTH AND SAFETY OF THOSE WHO LIVE, WORK OR VISIT THE CITY OF MILWAUKEE BY CONDUCTING INSPECTIONS OF FOOD SERVICE ESTABLISHMENTS

WHAT IS A SANITATION GRADING SYSTEM

- A food establishment's health inspection will result in a sanitation grade that will be displayed on a placard that will be posted.

EXISTING GRADING SYSTEMS

- California
  - Santa Clara
  - Sacramento
  - Los Angeles
  - Riverside County
  - San Bernardino County
  - Orange County
  - San Francisco
  - Kern County
- Seattle-King County Washington
- Louisville, KY
- New Jersey
  - 98% of the 96 local health dept. used a placard system, a couple use letter grading.
- Texas
  - Fredericksburg
  - Plano
- Southern Nevada Health District
- New York City, NY
- Boston, MA
- Toronto, Canada
- Lincoln-Lancaster NE
- Hawaii
- North Carolina Public Health
  - Randolph County, NC
- Nevada
  - Las Vegas
  - Washoe County
- Mississippi State Department of Health
- Atlanta, GA
- Town of Darien, CT
- Columbus, OH
- Tennessee Department of Health Services
- State of South Carolina

ELEMENTS NEEDED

1. All inspections must be standardized
2. Inspections are risk based
3. Consumer education
4. Partnership with operators, providing education

WHY SHOULD REGULATORS GRADE SANITATION AT FOOD ESTABLISHMENTS?

- To reduce outbreaks of foodborne illnesses and risk factor violations
- Increase transparency- allow consumers to make more informed decisions

WHY SHOULD REGULATORS GRADE SANITATION AT FOOD ESTABLISHMENTS?

"The Health Department's food safety program is a national model for achieving high food safety standards among restaurants," – Jennifer Pomeranz, NY professor of Public Health Law and Policy

WHY SHOULD REGULATORS GRADE SANITATION AT FOOD ESTABLISHMENTS?

"Posting the letter grades in Boston restaurants is a win/win for all. It not only allows transparency of the establishments business practices but also holds them accountable thus, ensuring compliance. This policy allows the public to make an on the spot informed decision when choosing their dining options" - Inspectional Services Department Commissioner William Christopher

WHY SHOULD REGULATORS GRADE SANITATION AT FOOD ESTABLISHMENTS?

"There needs to be some way for the public to know about the safety of the places they dine and a way to encourage the operators to stay on top of the risk factors. The grading or placarding system is very good at accomplishing both. Combining the placards/grading system with some kind of industry recognition for those who go above and beyond in food safety is a great tool!" – Jeanne Garbarino – Principal Registered Environmental Health Specialist, City of Vineland New Jersey

WHY SHOULD REGULATORS GRADE SANITATION AT FOOD ESTABLISHMENTS?

"Toronto Pubic Health has experienced a significant increase in compliance with food safety requirements from less than 50% prior to the implementation of the DineSafe program in 2001, to over 90% in the last five years. We are also observing a decrease in the number and types of infractions that are known to contribute to foodborne illnesses. Additionally there is very good support for the program from both consumers and the food industry." – Sylvanus Thompson PhD, MSc, CPHI Associate Director Healthy Environments, Toronto Public Health

SUCCESSFUL SANITATION GRADING SYSTEMS

New York City*

- 41% drop in sanitary violations from the peak of fiscal year 2012
- 38% decrease in restaurants cited for holding cold food at the wrong temperatures
- The number of restaurants temporarily closed following an inspection has decreased from a rate of 5.7 percent in the first year to 2.8 percent seven years later.
- 32% decrease in rate of salmonella since 2010
- 91% of New Yorkers approve of restaurant grading
- 88% of New York City diners use the letter grades in making their dining decision.

*93 Percent of Restaurants Earn an "A". (2017, May 2) Retrieved from www1.nyc.gov/site/doh/about/press/pr2017/pr031-17.page

SUCCESSFUL SANITATION GRADING SYSTEMS

Los Angeles California*

- 19% decrease in food borne illness within the first year
- 13.1 % decrease in hospitalizations due to foodborne illnesses in the year of implementation.

- * **Impact of restaurant hygiene grade cards on foodborne-disease hospitalizations in Los Angeles County.** J Environ Health. 2005 Mar;67(7):32-6, 56; quiz 59-60.

SUCCESSFUL SANITATION GRADING SYSTEMS

Toronto Canada*

- 2011 Crumbine Award recipient
- Compliance with food safety standards went from 42% to over 90%.
- 18% overall increase in hygiene
- 30% reduction in food borne illness over 5 years

GRADING SYSTEM SUPPORT

We trust this information is helpful. The ORHMA – TRB believes the work done by Toronto Public Health has increased restaurant compliance with food safety regulations, thereby increasing the very state of the industry itself.

Please do not hesitate to contact me should you require further information or have any questions.

Jason Cheskes
President
ORHMA – Toronto Region Board

PROCESS

1. Consumer Environmental Health program evaluation
2. Violation data analysis – Team Blitz from the University of Wisconsin Milwaukee
3. Research – Team Blitz and the Consumer Environmental Health Team
4. Program and software development

CONSUMER ENVIRONMENTAL HEALTH PROGRAM EVALUATION

- Shortage of inspectors
- Staff retention
- Consistency in inspection

INSPECTION DATA ANALYSIS

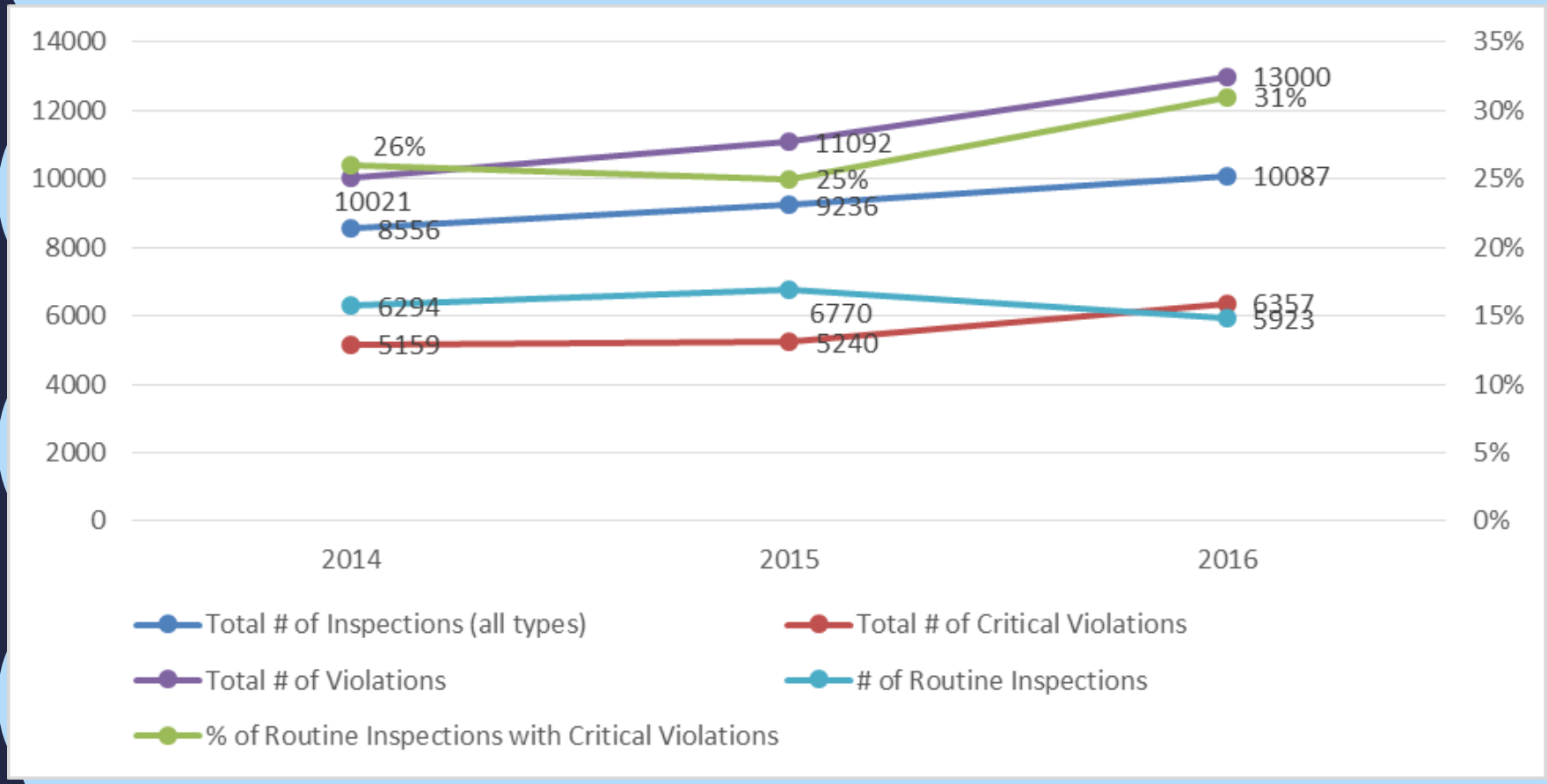
- 32% of establishments have priority violations
- 141 confirmed cases of food borne illness in 2016
  - When applying the CDC ratio for underreporting that is 4,483

Cases Reported	2016	Three Year Average	Estimated # of Cases Per Case Reported[1]	Total Estimated Cases 2016	Total Estimated Cases Three Year Average
Campylobacter	45	53	29.3	1395	1633
E. coli 0157	16	11	26.1	432	297
Listeria	1	2	2.1	3	7
Salmonella	77	78	29.3	2387	2428
Vibrio	1	1	142.4	143	95
Yersinia	1	1	122.8	123	123

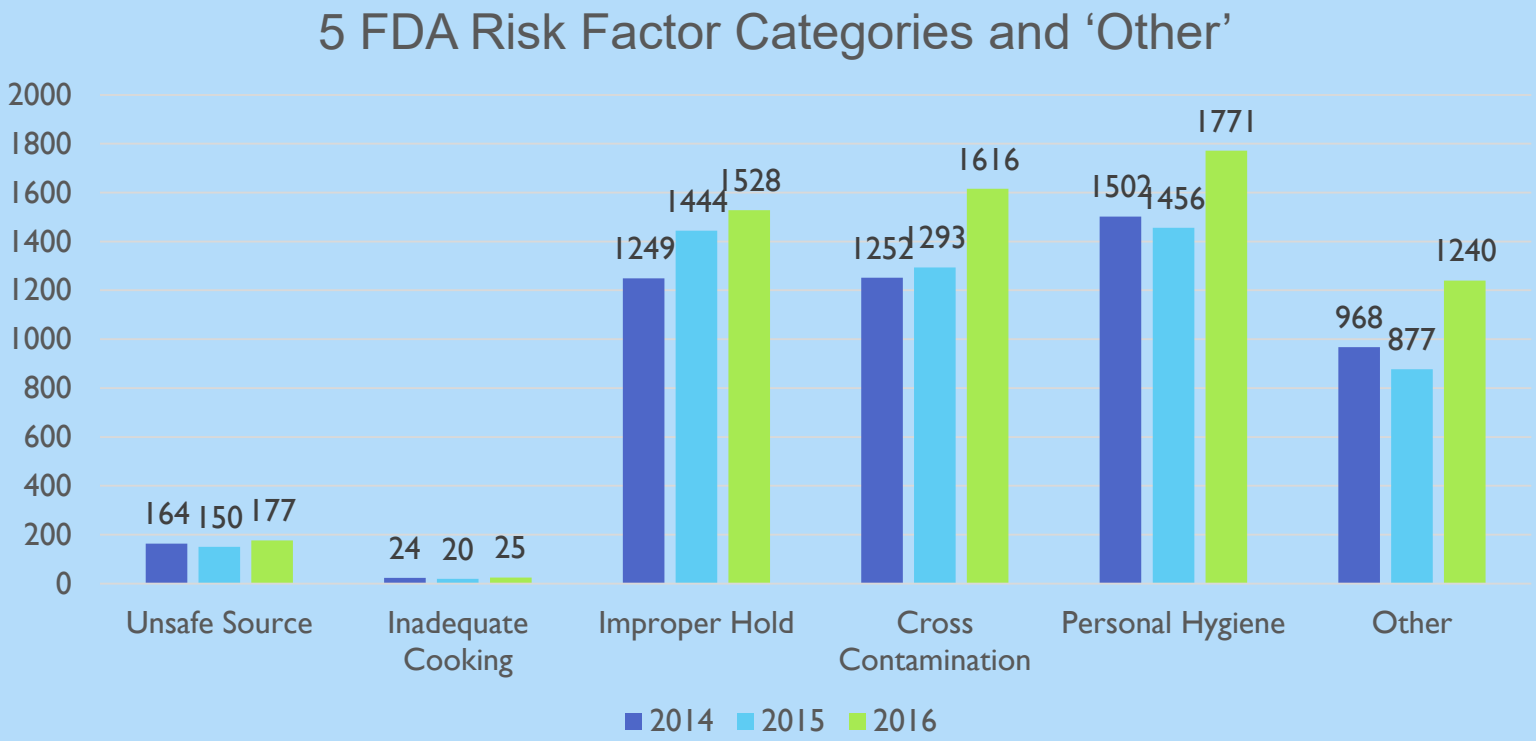
INSPECTION DATA ANALYSIS

- 17% of routine inspections have repeat violations
- 46% of routine Inspections required a re-inspection
- 8% of routine inspections required a second re-inspection
- 2% received a third Inspection
- >1% received a fourth inspection
- Most common violations:
  - Improper holding temps – hot/cold
  - Cross contamination
  - Personal hygiene

VIOLATION TRENDS



VIOLATION TRENDS



RESEARCH COMPLETED – FOCUS GROUP

Focus group intentions

- Focus groups of operators and consumers conducted by Research Solutions Inc.
  - Explore awareness of current food safety/sanitation practices in the City of Milwaukee among consumers and operators
    - Concerns about food safety/sanitation
    - Expectations
    - Awareness of current food safety/sanitation practices/process
  - Discuss how the grading system will be communicated/posted by food establishments
    - Reactions to the food sanitation/grading system
    - Feedback on placards (A,B, C model chosen by both groups)
    - Explore methods of communicating the results (e.g., apps, website etc.)

RESEARCH COMPLETED – FOCUS GROUP

Focus group overall findings

- Both groups feel the City of Milwaukee does an adequate job of monitoring and informing the public about food safety/sanitation
- Consumers were enthusiastic about the addition of the grading system
- Operators were skeptical of the need for a grading system. Some questioned whether the system would improve safety and felt that the system could threaten the livelihood of those businesses that received low grades
- Both preferred the letter grade samples – left less room for ambiguity

RESEARCH COMPLETED – FOCUS GROUP

Conclusion – operators

- Voiced concerns with their perceived inconsistency with the current system
    - Fears the grading system would be inconsistently executed by inspectors
    - Concerns consumers would not understand the grades
    - Concerns restaurant livelihood would be at risk if an establishment received a less than perfect score
- Felt it is important that the public be well informed as to what each letter grade means – clear that it simply refers to the safety and sanitation NOT the quality of the food or service
- Would like a special seal when they score 100% to show customers the establishment excels in the area of food safety/sanitation

RESEARCH COMPLETED – FOCUS GROUP

- **Conclusion - consumers**
  - Consumers trust the City of Milwaukee Health Department when it comes to regulating local food establishments on their safety/sanitation
  - Have a low understanding regarding current food service inspection and safety procedures
  - Agreed that any program that increases transparency of the food service safety/sanitation of establishments is a welcomed addition
  - Initial reaction to the grading system was positive, believe it will result in healthier dining and better overall cleanliness in food service
  - Preferred the letter grade placard, expect to see it posed in the front window or an inside wall as you enter the establishment.
  - Would like an app to get up-to-date information
  - Agreed they would be more likely to patronize food establishment that receive high marks for safety and sanitation

RESEARCH COMPLETED - OUTREACH

- Spoke with multiple Jurisdictions throughout the United States regarding grading system –
  - Seattle-King County, Seattle, WA
  - City of Vineland, New Jersey,
  - Lincoln-Lancaster, Nebraska
  - Houston, Texas
  - Boston, Massachusetts
  - New York City, NY
  - Toronto, Canada

RESEARCH COMPLETED – ON-SITE

- On-site Visit Toronto Canada
- On-site visit Boston Massachusetts
- On-site visit New York City, New York
  - Activities:
    - Shadowed inspectors
    - Talked with operators
    - Learned the day to day challenges
    - Discussed research and implementation plans
    - Discussed ongoing quality assurance measures
    - Lessons learned

RESEARCH IN PROGRESS

- Initiated conversations with Daniel Ho (Stanford University)
  - Previously worked with Steven Hughes (FDA)
  - Research involves using statistics and large-scale quantitative data to improved, assess, and evaluate public sector decision making. Most recently, he conducted a randomized controlled trial with the Public Health Department in Seattle – King County to improve food safety inspections via a comprehensive peer review and training program.
  - Peer to Peer Inspections (Modeled after Seattle King County)
    - The idea is that if inspectors could review and deliberate over each other's work, the quality and consistency of decision making would improved over time.

RESEARCH IN PROGRESS

- Online surveys by Research Solutions LLC to obtain quantitative data
  - Send to operator and consumer groups
  - Any outstanding concerns will be addressed
  - Will help determine information provided during information sessions offered this fall

TRAINING PROVIDED FOR OPERATORS

- Training currently offered to the operator from MHD
  - In 2016 CEH offered 189 training sessions to 1,235 individuals covering topics such as cross contamination, food allergens, employee health and food borne illness
  - The CEH Division is represented at the License Division Pivot Program Meetings and beginning in 2017 we have been offering an additional 30 minute food safety training.
- Proposed future trainings
  - Food Safety Workshops Operator led inspections – not regulatory
  - One Day Conference for Operators on areas they suggest

ESTABLISHMENTS SUBJECT TO GRADING

All establishments with a City of Milwaukee Food Dealers license will be issued a sanitation grade.

- This includes:
  - Restaurants
  - Grocery Stores
  - Convenience Stores
  - Bakeries
  - Butcher Shops
  - Mobile trucks and peddlers

- This does not include:
  - Temporary events
  - Schools
  - Any State of Wisconsin Department of Agriculture Trade and Consumer Protection (DATCP) establishments
  - Any establishment except from licensing (i.e. community food programs, non-profits, youth concessions)

HOW ARE GRADES DETERMINED?

Violations are categorized based on the FDA criteria below:

- Priority (contributes directly to the elimination, prevention or reduction to an acceptable level, hazards associated with foodborne illness or injury and there is no other provision that more directly controls the hazard.) = **5.0 points**
- Priority Foundation (supports, facilitates, or enables one or more priority items) **3.0 Points**
- Core Item (usually relates to general sanitation, operational controls, sanitation standard operating procedures, facilities or structures, equipment design, or general maintenance) =**2.0 points**

HOW ARE GRADES DETERMINED?

Each restaurant will start with 100 points. Points are deducted as follows:

Priority violations	- 5.0 points
Priority Foundation violations	- 3.0 points
Core violations	- 2.0 points

Scoring:

A= 100% - 79%

B= <79% - 60%

C= < 60%

Temporarily Closed = Less than 60% or imminent health hazard, establishment will reopen after all priority violations have been corrected and the imminent health hazard is eliminated

REINSPECTION – POINTS EARNED BACK

During reinspections points can be earned back (with the exception of repeat violations)

	Reinspection #1	Reinspection #2	Reinspection #3
Priority	3.0	2.0	1.0
Priority Foundations	1.8	1.2	.60
Core	1.2	.80	.32

HOW ARE GRADES DETERMINED?

- Weighted Average of the latest 3 routine inspections
  - 1st inspection will be 100% the initial routine inspection
  - 2nd routine inspection will be 50%, 50% will be from the previous inspection
  - 3rd routine inspection listed below:

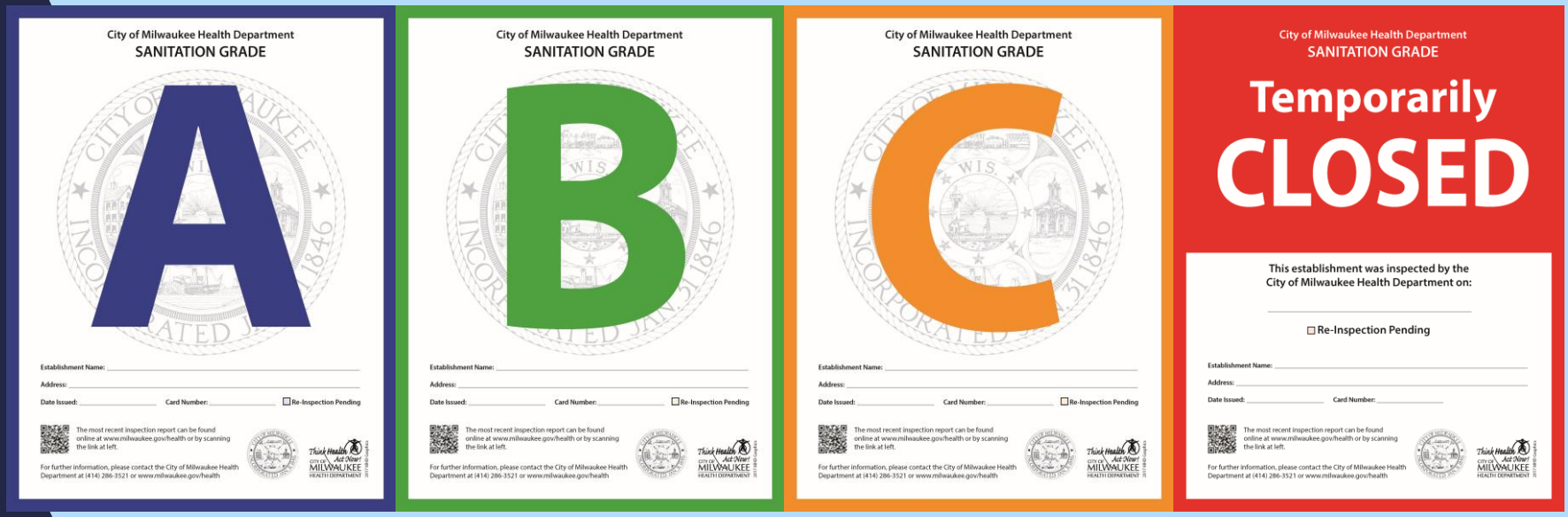
Weighted Average Score			
Inspection	**Weight**	**Percent Achieved (%)**	**SCORE**
1 (current)	0.5	100	100
2	0.35	100	
3	0.15	100	

CATEGORIES

Categories

A	B	C	Closed
100% - 79%	<79% and = 60%	< 60%	Imminent Health Hazard or Sanitation grade < 60%

SANITATION GRADE PLACARDS



POSTING LETTER GRADES

- Placard will be posted after completion of the inspection report
  - Inspection reports must be issued to the operator within 24 hours of the inspection
    - Appeals can be requested at the time of report issuance as described in the next slide
- General requirements:
  - 4 to 6 feet from the ground or floor
  - Within 5 feet of the front door or direct entrance
  - In a conspicuous place on the establishment's front window, door or exterior wall
- Understanding all buildings are designed differently, the health inspector will work with the operator to identify an acceptable place to post.
  - Operator may work with inspector to display in a frame or simply taped at the location.

APPEALS

- Inspection reports will not be accessible online for 15 business days to allow the appeals process to be completed.
- If an appeal is requested, the operator will fill out an appeal form at the time of report issuance or online within 5 days of the inspection. Appeals shall be heard by the commissioner or his authorized representative within 10 business days following the receipt of a written appeal request. The inspection report and placard shall be updated based on the outcome of the appeal.
  - Operators will post a '**Grade Pending**' placard either along with the initial grade issued or independently during the appeal process.

QUALITY ASSURANCE IN INSPECTIONS

- Analyze and evaluate violation data to monitor trends and training needs.
- Quality assurance- joint inspections, report reviews and field audits
- Listened to concerns from operators with food safety consistency between inspectors
- Peer to Peer Review inspections
  - Program developed by Daniel Ho and was used prior to implementing the grading system in Seattle-King County.

WHEN WILL GRADING BEGIN

- Sanitation grading system will start early 2018 with posting **voluntary**. Required posting will begin in 2019
- The first routine inspection in 2018 will be graded
- If an establishment receives a violation on the routine inspection , CEH will conduct a re-inspection within 10-20 business days and re-grade. Grades will be accessible to the public on the City's website.

CONTINUING EFFORTS

Pre-system implementation

- Website update to include sanitation grading information
- Press release
- Online survey sent to consumer and operator groups
- Information sessions offered to operator groups
- Consumer Education – press and social media campaigns
- Email distribution of sanitation grading system information – including offer to calculate 2017 inspection in test database for operator knowledge

CONTINUING EFFORTS

Post-system implementation

- Develop requirements for mobile food dealer's
- Convene the Food Safety Advisory Committee during the 1st quarter
- Midyear online survey
- Consumer Environmental Health Division ongoing quality assurance project – food sanitation system
- Explore development of an app
- Annual food borne illness trend report – April 2019 will see the change in 2018.
- 2020 FDA Risk Factor Study analyze change over time

CONTINUING EFFORTS

Intervention strategies

- Food safety workshops - Spring/Fall 2018
- In development - individual educational trainings offered by inspectors
- Bite-sized mini sessions on critical food safety topics for managers during staff meetings
- Providing inspection history reports for operators on most common violations in their establishments

QUESTIONS

Please contact :

foodsanitationgrading@Milwaukee.gov