

Alternative Methods for Demonstrating Knowledge

Method 1: The person in charge can demonstrate Food Code knowledge through practical means such as showing how they take temperatures, calibrate a thermometer, mix or test sanitizer, showing a posted employee health policy or list of major food allergens, etc.

Method 2: Establishment is in compliance with 2-103.11.

Method 3 : Recommend *modifying* Section 2-102.11 of the Food Code as follows:

Section 2-102.11 (B) would remain as currently written in the Food Code and would be followed by this:

- If the Certified Food Protection Manager is not present, and because the distinction between knowledge and application is vague and difficult to articulate which often leads to frustration between operators and regulators, the PIC shall be a food handler certificated through an ANSI-ASTM accredited program or its equivalent. The PIC shall substantiate knowledge through direct application of (A) through (O) of the Duties Section of the Food Code (2-103.11.) The successful completion of these tasks should adequately demonstrate the PIC's knowledge.
 - Eliminate Section 2-102.11 (A). The number of times that an establishment has no priority violations is statistically insignificant. There is also the suspicion among regulators that a lack of priority violations could be accidental and not a true reflection of demonstration of knowledge.
 - Eliminate Section 2-102.11 (C). The Food Code already articulates the duties of a PIC in Section 2-103.11. In addition, the entirety of the risk based inspection identifies whether an establishment is controlling risk and, by extension, whether knowledge is being demonstrated through application. The current list of 17 questions found in 2-102.11 (C) could be moved to Annex 5 as guidelines for inspectors who wish to have dialogue with PICs.

Method 4: Employees are completing tasks correctly.

Method 5: Having one or more food handlers who are certificated through an ANSI-ASTM accredited program or equivalent and who comply with section 2-103.11 of this Code, thus applying practical means knowledge to the successful completion of tasks.

Method 6: The PIC can show evidence of demonstration of knowledge through the use of job aides or other means.

Method 7: Change the Demonstration of Knowledge criteria. Instead of meeting one of the three options to be in compliance, change it to having to meet two of the three options to be in compliance.

Method 8: The establishment has a food handler certificated program through an ANSI-ASTM program or equivalent and one or more employees is certificated through the program.

Method 9: Change the code language in 2-102.11 (C) to: “Demonstrating food safety principles based on the specific food operation. The areas of knowledge include...”.

Method 10: Recommend *eliminating* Section 2-102.11 within the Food Code as follows:

This method seeks to replace the Demonstration Section, in its entirety with reliance instead on the Duties Section as it might be performed by ANSI-ASTM accredited food handlers:

Allow the Duties Section of the Food Code (2-103.11) to substantiate demonstration of knowledge in lieu of the Demonstration Section (2-102.11). The distinction between knowledge and application is vague and difficult to articulate and this can lead to frustration between operators and regulators. Having one or more food handlers certificated through an ANSI-ASTM accredited program or equivalent and who comply with (A) through (O) of Section 2-103.11 by applying practical knowledge to the successful completion of tasks should adequately demonstrate knowledge of the PIC.

- Eliminate Section 2-102.11 (A). The number of times that an establishment has no priority violations is statistically insignificant. There is also the suspicion among regulators that a lack of priority violations could be accidental and not a true reflection of demonstration of knowledge.
- Eliminate Section 2-102.11 (B). The Food Code already requires the presence of a CFPM in Section 2-102.12 (A). The FDA Risk Factor Study correlates the presence of a CFPM with better control of risk factors and provides justification for the requirement in the Food Code to have at least one CFPM per establishment.
- Eliminate Section 2-102.11 (C). The Food Code already articulates the duties of a PIC in Section 2-103.11. In addition, the entirety of the risk based inspection identifies whether an establishment is controlling risk and, by extension, whether knowledge is being demonstrated through application. The current list of 17 questions found in 2-102.11 (C) could be moved to Annex 5 as guidelines for inspectors who wish to have dialogue with PICs.