

Cooling Verification

Perhaps you're the owner of a successful restaurant, or maybe you're even the Certified Food Manager for your business. You know how to create successful policies and train your employees. So why did you still get a cooling violation?

It's probably time to verify that your establishment's cooling policy is being followed.

First of all, what is verification, and how do you verify that your cooling policy is being followed?

Verification is the periodic validation of food safety procedures. Use your verification process for feedback on whether you need to retrain employees or modify your policy.

As you create a verification process to ensure your cooling policy is being followed, ask yourself these important questions:

How do you verify that policies and training are being followed?

Do you write anything down during your verification step?

Do you have logs?

Do your logs include monitoring of all of your cold holding equipment?

Are you verbally testing your staff?

Do they know the proper time/temperature parameters for cooling hot time/temperature control for safety (TCS) food and cold prepped food? Can the staff explain what your policy is, and demonstrate how to follow your procedure?

Are you watching your employees to determine if they are following policies?

How frequently? In which areas of the kitchen? You may want to include spot checks of front and back of house areas, prep stations and on your cook line.

If a job is assigned to a mid-level employee, are you following through to ensure that they are doing their job, especially during busy times?





How often do you verify that your policies are followed?

Do you check logs daily? After each meal? Weekly? Frequent verification is helpful to ensure that prompt feedback can be given.

What do you do if a policy is not being followed properly or an item is found to be out of compliance?

Use areas of non-compliance to provide targeted training for your staff.

How do you document corrective actions?

Completing the AMC Cycle for Continual Improvement

When you find areas of non-compliance in your establishment, such as TCS food not being cooled from 135°F to 41°F within 6 hours, try to determine the root cause. Was it because your employees need additional training? Or are their gaps in your policy that you can adjust to make your policy more complete?

Think about how you can prevent this issue from happening again.

Was it a problem with the...

Policy?	Or Training?
Unit thermometers are broken	Employees don't know how to properly calibrate/verify thermometers
Food probe thermometers have never been calibrated	Employees don't know the proper cooling time/temperature parameters
Staff aren't utilizing shallow, uncovered containers	Staff do not complete logs regularly
Staff aren't utilizing ice bathes and/or ice wands for thick sauces and soups	Employees take temperatures of the outer portions of product (usually the coldest area) rather than the middle.
Cold prepped items are being placed out for service prior to being properly cooled	TCS food that is not properly cooled from are not being discarded
Insufficient refrigeration space available to meet the cooling demands	Employees do not inform managers of cooling issues



If the issues are related to an incomplete policy, then you may wish to consider these steps.

In some cases, you may want to create a completely separate policy. For example, if the employee didn't detect hot soup not reaching 41°F within 6 hours because their thermometer was broken or not properly calibrated, and you never had a policy in place for proper use of thermometers, you might want to write a separate policy on thermometer calibration and use.

Similarly, if you notice that equipment is working but that a cooling issue arises from employees utilizing deep, covered plastic containers, you may want to write a separate policy that addresses employee behaviors.

If the issues are related to training, then you may wish to think about these interventions.

Staff may need additional training in a particular area. Do staff know to check TCS food that is cooling in the middle of the product? Do your staff know which food is categorized as TCS? Remember to provide feedback to staff quickly, so that bad habits are not formed.

Who is failing to follow policies? Maybe your training has focused on new staff, and your senior staff may need a refresher training.

Perhaps you need to have more frequent food safety check-ins or training. Brief, frequent trainings are more effective than a one-time lecture on food safety.

You may want to focus a training on corrective actions. Sometimes staff see a problem but do not take action because they think that it is someone else's responsibility. Or your staff may not feel that they have the authority to take action on a particular issue. For example, a new employee may think they are not allowed to discard food, even if they find a TCS food item, such as cooked chicken stock, at 60°F after 8 hours of cooling. Be sure that you explain your corrective action process to staff, for example, by showing them an area in the kitchen where they can place food that will be recorded and "wasted out" by a manager.

Do your employees know who to ask when they have a cooling question? Be sure that there is someone available for food safety questions on every shift. Ideally this person will be the Person-In-Charge during that shift.

The last part of a verification process is for managers to review verification documents and logs to look for patterns and problem areas. You might find staff documenting an initial temperature that is too high (ex: 165°F rather than closer to 135°F) and then tracking the process from there. Or, you may find that parameters were not met for the first two hours of cooling, but staff continued to cool the product. Use insights from your review to suggest changes to your food safety team, and modify your cooling policy.

To summarize, here are the key steps to consider with any verification process:

- **Use your verification process for feedback about whether your policy is being followed**
- **Implementing logs works well to verify that your systems are working**
- **When you identify problems, quickly provide feedback to staff**
- **Regularly review logs and verification results to look for patterns and problem areas**
- **Look for the root cause of issues that you identify. Was it policy or training related?**
- **Modify policies or schedule additional training based on information you gather during your verification step.**

Remember, after making changes to your cooling policy, be sure to retrain your employees. You may wish to reread the Manager's Guide to Creating a Policy, and the Manager's Guide on Training your Employees.

