



# NAVY AND MARINE CORPS PUBLIC HEALTH CENTER

## IMPROVING READINESS THROUGH PUBLIC HEALTH ACTION

## Frequently Asked Questions – Tri-Service Food Code

### Policy and Guidance

#### Can I utilize my own inspection forms?

**NO** - The officially published documents on our web-site **MUST** be used on Food Operation Inspections that are now official DD forms. All Tri-Service Food Code forms are 2900 series form.

- Food Facility Risk Assessment - DD 2972, November 2013
- Food Operation Inspection Report - DD 2973, March 2019
- Tactical Kitchen Inspection - DD 2974, November 2013
- Temporary Food Event Coordinator's Application - DD 2975, November 2013

**Public Health Rationale:** *Use of standard form increases standardization of inspections across Navy Medicine. Additionally, it avoids confusion and training gaps when inspecting in a joint services environment.*

#### Should sanitizer be tested every time it is used? Is testing it twice a day sufficient?

4-302.14

**MAYBE** - Upon mixing new sanitizing solution you should test to ensure proper concentration. Checking the solution in use (i.e bucket holding wiping clothes) may need to be performed more often to ensure sanitizing solution is retaining the proper strength. Twice a day may or may not be sufficient depending on each situation. We do not specify testing frequency.

**Public Health Rationale:** *Testing devices to measure the concentration of sanitizing solutions are required for 2 reasons:*

1. *The use of chemical sanitizers requires minimum concentrations of the sanitizer during the final rinse step to ensure sanitization; and*
2. *Too much sanitizer in the final rinse water could be toxic*

#### Are pre-set glassware and plates considered tableware?

4-904.13 & GLOSSARY (Definition – TABLEWARE)

**Yes** - Definition for tableware includes cups, plates and eating utensils.

**Public Health Rationale:** *Clean equipment and multiuse utensils which have been cleaned and sanitized, laundered linens, and single-service and single-use articles can become contaminated before their intended use in a variety of ways such as through water leakage, pest infestation, or other insanitary condition.*

#### Can sanitizers (i.e. bleach) be stored in food prep areas?

7-102.11 through 7-201.11

**YES** - Sanitizers can be stored in food prep areas if they are properly labeled and are located in a manner preventing cross contamination of food, equipment, utensils, linens and single-service or single-use articles.



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**Public Health Rationale:** Separation of poisonous and toxic materials in accordance with the requirements of this section ensures that food, equipment, utensils, linens, and single-service and single-use articles are properly protected from contamination. For example, the storage of these types of materials directly above or adjacent to food could result in contamination of the food from spillage.

### Can slash-resistant gloves be used to cut meat?

3-304.15 (B),(C)

**YES** - Slash-resistant gloves made with metal/Kevlar or other material that are absorbent and are used to protect the hands during operations requiring cutting CAN be use though but not a requirement under the TSFC. If used, they can only be used with a product that will be further cooked. An operator can use slash-resistant gloves for cooked foods provided the gloves are smooth, durable and non-absorbent. If the operator wants to use the gloves made with metal/Kevlar or other material with cooked foods they can do so if those slash-resistant gloves are covered by smooth, durable and non-absorbent or a single-use glove.

**Public Health Rationale:** Gloves used in touching ready-to-eat food are defined as a "utensil" and must meet the applicable requirements related to utensil construction, good repair, cleaning, and storage. Slash-resistant gloves are not easily cleaned and sanitized. Their use with ready-to-eat foods could contaminate the food.

### Are any existing variances issued under the old P-5010-1 still valid?

8-103

**NO** - All previous variances must be reevaluated to ensure they comply with the new TSFC and to see if they still are valid (or required). For example, the previous standard for cooking whole-muscle pork was 155°F for 15 seconds; the new standard allows cooking MEAT (which includes "swine") to 145°F for 15 seconds. If a variance under the old NAVMED P-5010-1 was approved to cook pork at 145°F, the variance would no longer be required under the TSFC.

### Is there minimum class length for ServSafe© classes?

2-102.20

**NO** - In regards to the FOOD MANAGER Certification (FMC) there is no prescribed timeframe. However, the exam has to be either for Navy and MC, The CANTRAC course and exam or an ANSI-certified examination. See **2-102.20(B)**. For food service employees (non-supervisors) there are 4 hour requirements annually. See **2-501.11**. Minimum requirement states the training must encompass the CDC's Five Foodborne Illnesses Risk Factors. ServSafe© is one of numerous recognized industry standards at this time. **DOD may not appear to endorse a particular commercial product;** therefore, the TSFC does not list the various commercial products available for training. There are numerous companies that offer similar products. Recommending by name any one specific course can be an ethics violation.

**During TSFC Introduction training, we discussed requirements for gloves to be worn (3-304.15) when handling food, but I could not find the direction worded as 'shall', the reference states 'may'. Can you please clarify?**

3-301.11(B)



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**The question refers to the wrong paragraph.** Note: Remember, TSFC is arranged by principles not subject. 3-304.15 addresses the principle associated with contamination from equipment/utensils and simply discusses the limitation regarding glove use. **3-301.11** addresses the principle associated with contamination from employees and requires protective measures when handling ready-to-eat foods. Gloves are **only** mandated (**3-301.11 (B)**) if an alternative modality is not used. Gloves are not required when handling raw foods that will be further processed (i.e., cooked – 3-301.11(C))

**Can we clarify which populations meet the definition 'highly susceptible populations'? Example: are SOI, WTI training conducted in Yuma, training in Bridgeport and in 29 Palms; and other training situations considered high risk populations?**

GLOSSARY (Definition -highly susceptible populations)

**MAYBE** - Not every training environment may fall under highly susceptible populations (HSP). Each decision will be made by installation Preventive Medicine Authority (PMA). As defined, a HSP encompasses Initial entry training ((IET) (Basic)) and would include a military training campus where individuals are attending their initial military skills training following completion of IET. Additionally, field training lasting 2 weeks or more and the dining facilities which are remote feeding to sites where individuals are housed in temporary shelters and subsisting in a field environment (ranger training, Seal training, MC Recon) are considered HSP. All other military training institutions are generally not considered HSPs unless deemed so by the local PMA

**We have wall mounted insect control devices that look like light fixtures that are above 3 ft above the floor, although they are not in close proximity to food production areas. Do we need a variance to have these, or is this mainly about food production areas?**

6-202.13

**NO** - A variance **does not apply** to this type situation. A “variance” applies to a **change** in a food safety control (i.e., time or temperature). See definition for VARIANCE in the Glossary. In Food service and preparation areas insect control devices cannot be located above food or food prep areas. **SEE: 6-202.13(B)(4)**

**Public Health Rationale:** *Insect electrocution devices are considered supplemental to good sanitation practices in meeting the Code requirement for controlling the presence of flies and other insects in a food establishment. Improper design of the device and dead insect collection tray could allow dead insect parts and injured insects to escape, rendering the device itself a source of contamination.*

*Exposed food and food-contact surfaces must be protected from contamination by insects or insect parts. Installation of the device over food preparation areas or in close proximity to exposed food and/or food-contact surfaces could allow dead insects and/or insect parts to be impelled by the electric charge, fall, or blown from the device onto food or food-contact surfaces*



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**We have handwashing sinks that have signage, but not all have our handwashing policy posted. (Note: This is a specific contractor in-house requirement) Is it enough to have the universal signage which is a picture of someone washing their hands) or do we need to have the policy statement as well?**

6-301.14

**YES** - Simple signage showing or describing proper handwashing at kitchen area hand sinks is appropriate. Signage in restrooms used by both employees and customers must have a sign stating **“employees must wash hands”**. A company’s “policy” signage is optional but **not** required by the TSFC. The intent of signage is to remind employees to wash hands before going back to work after hands have been contaminated.

*Public Health Rationale: A sign or poster is required to remind food employees to wash their hands.*

**In reference to rodent bait stations the TSFC specifies the PIC shall have access to a map of bait station locations throughout the facility, which is maintained and updated by the pest control operator. Once submitted does it need to be updated and how often expected to be updated by the PCO?**

7-206.12

**YES** - Update map when or if locations change. **There is no mandated timeframe for this update however the PCO should provide an updated map as soon as possible.**

*Public Health Rationale: Open bait stations may result in the spillage of the poison being used. Also, it is easier for pests to transport the potentially toxic bait throughout the establishment. Consequently, the bait may end up on food-contact surfaces and ultimately in the food being prepared or served.*

**Can variances/waivers be applied for above the installation level? Especially, if a contractor operates with other branches of the military or for both contracts (RGFSCII includes one contract for East Coast garrison Mess Halls and one for West Coast garrison Mess Halls)?**

8-103.11(D)

**YES** - A variance request could cross **installations, as well as** services. These variances should be reviewed by the Services HQs SMEs in coordination with the requesting installation PMA.

**Self-evaluation can be a monitoring activity on a daily basis, does the weekly self-evaluation have to be an inspection form, or does monitoring activities associated with HACCP records suffice?**

8-402.12

**NO** - HACCP records only meet the requirements for daily informal evaluation. Weekly comprehensive inspection evaluation must include general facility sanitation. You can use any checklist you would like that meet the requirements of a comprehensive inspection or use our inspection form. A general sanitation checklist that covers employee hygiene practices,



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equipment management and warewashing, and status of physical facilities will suffice when combined with one of the daily HACCP checks.

### For follow up inspections, will the inspector only review items previously found to be non-compliant or will the inspection include all observations

8-403.30

**MAYBE** - Generally the follow-up inspection is intended to only focus on the violations previously noted. However, if in the course of the follow-up inspection **critical violations** are observed then that follow-up inspection can revert to a comprehensive inspection.

### In the past, Base Food Service has notified the Army Vet contingent in case of a power outage, please clarify who should be notified in case of a power outage lasting more than 2 hours, or an Imminent Health Hazard (IHH)

8-404.11

**BOTH** - Preventive Medicine and the installation Army Vets should be notified at the same time. These groups perform different food safety assurance roles and must collaborate during an IHH situation.

### USMC contract still requires representative meal trays, is there any requirement in the TSFC? PROVISION: NONE APPLY

The TSFC (NAVMED P-5010-1) **does not** require a representative meal tray (aka Dead Man Tray). It may be required by the contracting agent and should be specified in the contract. It is not a public health requirement.

### Are food handler cards required by the TSFC?

2-201.20

**NO** - Not required in the TSFC, unless the medical authority specifies the requirement in a formal policy that is applicable to their jurisdiction.

### Are medical screenings required? How will the local medical screening requirements be communicated? Is it expected that any location will still require an annual medical screening form to be completed?

2-201.20

Medical screenings are **not** directed by the TSFC. The medical authority in a specific region may require medical screenings based on regional health risks. If this is the case then the language should be specified in the contract. Ultimately, **the facility person in charge** has the responsibility to ensure that employees are informed as to their responsibility to report and disclose certain illnesses and symptoms **SEE: DD Form 2971 and Provision 2-201.11.**



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**Can leftovers from serving lines be retained if we are not working in a highly susceptible population and they were not from a self-service line? Also, can packaged leftovers, such as packaged crackers be kept that were on a patron table?**

3-501.110\*

**YES** - Keep in mind that food on serving lines must remain at proper temperatures and protected from contamination; individual serving packages removed from patron trays or tables must be inspected to insure package integrity is good and there are no indications of contamination or package degradation.

**Send your questions to:** [usn.hampton-roads.navmcpubhlthcenpors.list.nmcphc-prgpolicysup@mail.mil](mailto:usn.hampton-roads.navmcpubhlthcenpors.list.nmcphc-prgpolicysup@mail.mil)

**For more information, visit the NMCPHC Food Sanitation and Safety web page:**  
<https://www.med.navy.mil/sites/nmcphc/program-and-policy-support/food-sanitation-and-safety/Pages/default.aspx>