

# PROGRESS REPORT ON THE DEVELOPMENT OF THE NEW PUBLIC HEALTH SERVICE RECOMMENDED FOOD SANITATION MANUAL<sup>1</sup>

BY WILLIAM C. MILLER, JR.

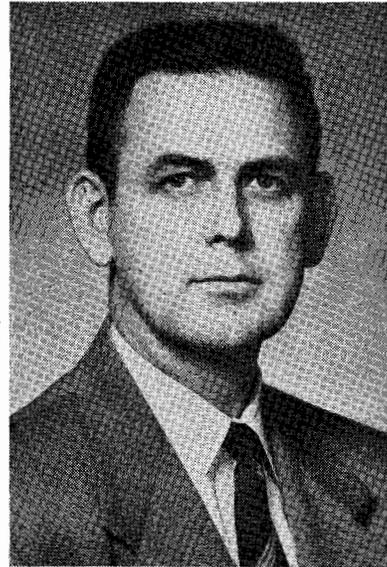
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During 1959, it is expected that the first working draft of the proposed new food establishment manual, which is currently under development by the Public Health Service will be submitted for review and comment to the States and, through the States, to representative counties and municipalities, and to the food service industries involved. This manual will represent the third major revision of PHS recommendations for the public health protection of food during its storage, preparation, and service. The first was the 1940 edition, the second the 1943 edition.

*The Ordinance and Code Regulating Eating and Drinking Establishments — 1943 Recommendations of the Public Health Service* represents the most current sanitation standards for food preparation and service published by the Public Health Service. Although these criteria are based on the 1943 technology, many of the fundamentals of food preparation set forth are as applicable today as they were 15 years ago. Accordingly, it might be said that many of the deficiencies in the 1943 Ordinance and Code are attributable to omissions rather than commissions.

The need to revise the 1943 edition or to prepare a completely new food establishment sanitation manual became apparent soon after the termination of World War II. In 1946 the Conference of State and Territorial Health Officers recommended that the code be revised and expanded to include provisions for other types of food service and food processing establishments such as meat markets, grocery stores, slaughter houses, confectionaries, etc. The National Sanitation Foundation Clinic in 1948, made a similar recommendation. The need to revise the 1943 recommendations was underscored both by advancements in technology and in public health practices. In addition, the experience gained by health authorities and restaurant operators in its application and enforcement prompted suggestions for modification of a number of the specific technical and administrative provisions.

Preliminary work on the development of a new manual was initiated in 1954. At that time two im-



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portant steps were taken. The first was to request the food service industry, all of the States, and through the States, a small but representative number of municipalities and counties to review the 1943 Ordinance and Code and to submit suggestions for changes. Because of earlier comments in two areas; first, objections to the grading option of the 1943 Ordinance, and second, questioning the desirability and need of the interpretative code section, the views of the States and communities in these two areas were specifically requested.

The response was most gratifying in that replies were received from 38 States, the Territories of Alaska and Hawaii, and 122 municipalities and counties. Most comments related to the need for clarification and the need for incorporation of additional information based on research and technical advance-

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ments. With reference to the two matters on which views were specifically requested, 20 States and 84 cities and counties favored retention of the optional grading provisions, and 29 States and 105 municipalities and counties favored retention or expansion of the interpretative material. A discussion of suggested changes from States, communities, and industry was presented at the 1955 Annual Meeting of this Association by Mr. John D. Faulkner, Chief of the Service's Milk and Food Program.

The second important step, taken almost simultaneously with the first, was the reorganization of the advisory board structure to provide a higher degree of competency in the field of food establishment sanitation; and to provide for greater industry participation in the development of program guides. The Public Health Service Food Establishment Sanitation Advisory Committee was formally authorized by the Surgeon General in December 1955. This 16 member Committee was organized to provide representation from State and local health agencies, national public health and sanitation organizations, and the food service industries most directly concerned. In addition, two members from educational institutions were appointed. The Chief of the Milk and Food Program was designated as the Public Health Service representative on the Committee to serve as Chairman. The International Association of Milk and Food Sanitarians is officially represented on the Advisory Committee by Mr. Jack Fritz, who is Chairman of this Association's Committee on Food Equipment.

The first meeting of the Advisory Committee was held in November 1956. This meeting was not concerned with the details of specific technical provisions but primarily with the establishment of the broad guide-lines which should be followed in the development of the new manual.

It was generally agreed that the new manual should serve as a guide to both public health officials and industry personnel. It should present a clear picture of the aims and objectives of a food and beverage sanitation program. It should be an educational document in addition to presenting a model ordinance and code. It should include an introductory statement of purpose and supplemental technical information, as required. It should be acceptable to the industries involved and should be effective in program application. For health department field use and industry application, it should contain clear and concise interpretations.

Basic considerations with reference to the approach to the new document, the scope of its coverage, and the format in which it should be presented were major

items of discussion.

With reference to approach, the Committee made 7 specific recommendations as follows:

1. The approach should be an open-minded one, based on present-day needs and knowledge, embracing new techniques and procedures where these would improve current food sanitation practices.

2. The provision of the 1943 Ordinance and Code should be evaluated for their applicability and utility in the new manual.

3. The new manual should include an appropriate section emphasizing the advantages of an educational approach to food sanitation, and delineating the responsibilities of both public health agencies and industry.

4. A special effort should be made to differentiate between aesthetic factors and those essential to food protection.

5. An alternate procedure to "grading" which would be acceptable to health agencies and industry should be developed.

6. Consideration should be given to the feasibility of including provisions for industry self-inspection.

7. The place of periodic State evaluation in the implementation of local food sanitation programs should be set forth in an appropriate section of the new manual.

As to scope, the Committee unanimously recommended that no attempt be made at this time to cover retail food establishments other than food preparation and service types. In other words, it was felt that other types of retail food establishments, such as bakeries, meat markets, grocery stores, etc., should be covered separately. The Committee also recommended that, in view of the many different types of food preparation and service establishments now in operation, the definition of "restaurants" should be broadened and should clearly identify the additional types of operation covered by the manual.

Committee recommendations with reference to format were somewhat less definite. However, it was suggested that the new manual might best be presented in at least two parts, one dealing with the need, purpose, scope, and administration of an effective food and beverage sanitation program, and the other to contain the ordinance and code provisions. It was further suggested that the ordinance and code provisions should not be justified on public health reasons alone, but should take into account good industry practices and consumer expectations. Consideration was also given to the possibility of including an "appendix" or explanatory section which could provide details as to alternate methods of obtaining ob-

jectives, and which could be modified as required by technical changes.

The first meeting of the Committee resulted in several other developments which are particularly noteworthy. During this meeting, the Committee carefully reviewed the suggestions for changes in the 1943 Ordinance and Code which had been submitted to the Public Health Service by the States, communities, industry, other Federal agencies, and interested individuals and groups. Based on this review, the Committee identified some twenty-three technical and administrative problem areas on which further study or research should be undertaken. While the Committee members assumed responsibility for study of some of these problems, the Robert A. Taft Sanitary Engineering Center was requested to investigate others and to make recommendations to the Committee as to methods or procedures for their solution.

A highly significant development was an agreement by all members of the Committee to participate in the actual drafting of the new manual. This was particularly significant in that it represents a departure from the role normally played by previous milk and food advisory groups, and emphasizes the direct and personal interest of this Committee in the development of the new manual. To expedite the agreement, a three-man subcommittee met with the Public Health Service in January 1957, drafted a proposed outline of the new manual, and assigned the responsibility for drafting specific ordinance and code provisions to subcommittees.

With the background of the first Committee meeting discussions, together with a compilation of changes suggested by State and local health authorities and industry, the various subcommittees proceeded to develop recommendations covering their respective subject areas for incorporation into the first preliminary draft of the manual. This was critically reviewed by all Committee members. Their comments provided the basis for development of the second preliminary draft. Another meeting of the Advisory Committee in April 1958 was primarily for the purpose of reviewing the second draft.

To date, the revision of the proposed new food establishment sanitation manual has progressed through three drafts. In view of the extremely preliminary nature of these drafts, their distribution has been restricted to within the Public Health Service and to the members of the Advisory Committee.

While it would not be appropriate at this time to discuss the specific contents of the new manual in its present tentative form, there are several considerations

which are of interest to the members of this Association.

The term "New Look" has repeatedly come up during Committee discussions. This term has prompted and been the object of considerable levity. However, it has now begun to connote a philosophy which appears to have a great deal of merit. Essentially, it is concerned with motivating both the official agencies and the food service industry to a mutual understanding of the duties and responsibilities of each. It is intended to stimulate closer working relationships between industry and health agencies in seeking the common objective — the highest possible degree of consumer protection.

During the past few years a number of methods have been successful in establishing good rapport between officials and certain industries which are subject to regulation. It will not be the purpose of the new manual to attempt a detailed discussion of all such methods, nor to try to establish any sort of an inflexible pattern. On the contrary, the purpose will be to point up some measures that have been found to be helpful. Much of this so-called "New Look" deals with intangibles and will be presented in Part I; however, the philosophy is also to be incorporated into the ordinance and code provisions to the extent possible.

Of interest also is the proposed reorganization of the ordinance and code provisions. For a good many years the food service industry and a number of health authorities have felt that the order of items in the 1943 Ordinance and Code has given undue emphasis to factors indirectly associated with food protection, such as floors, walls, ceilings, etc. The Committee has proposed a reorganization of the ordinance and code material to deal first with the sources of food, its wholesomeness and protection; second, the people who handle it; third, the equipment and utensils contacting food; fourth, essential sanitary facilities and their maintenance; and fifth, other physical facilities, their maintenance and operation.

It is most appropriate at this point to recognize publicly the keen interest and active participation in this project by every member of the Advisory Committee. The Food Establishment Sanitation Advisory Committee is truly a working group. In addition to participating in called meetings, each member has served on one or more subcommittees and has taken time from already heavy schedules to assist in the investigation of problems and the preparation of subcommittee reports.

As to the current status of the new food establishment sanitation manual, a working draft of the ordi-

nance and code is being assembled from the most recent Advisory Committee reports and recommendations. This phase of the project is being undertaken by the staff of the Milk and Food Program, with the very able assistance of Mr. A. W. Fuchs, who is a past president of this Association. As soon as the working draft of the new manual can be completed and reviewed by the Advisory Committee, it will be ready for distribution.

As previously indicated, it is expected that the working draft of the proposed new food establishment sanitation manual will be completed in 1959. At that time, copies will be distributed for review and comment to all States, and through the States, to a representative number of counties and municipalities.

Copies will also be submitted for comment to industry, Federal agencies, and other interested organizations.

It should be emphasized that the new manual will have value to the extent that it meets the needs of the States and communities in the implementation of effective food sanitation programs. It is particularly important that it reflect the views of the official agencies and industries primarily concerned with the public health aspects of food establishment sanitation. Accordingly, it is urged that everyone concerned, who has the opportunity, carefully and critically review the working draft. Only by providing the Service and Advisory Committee with the benefit of your experience and thinking can the new manual most nearly meet the objective for which it is intended.

## A STUDENT PROJECT IN COMMUNITY HEALTH

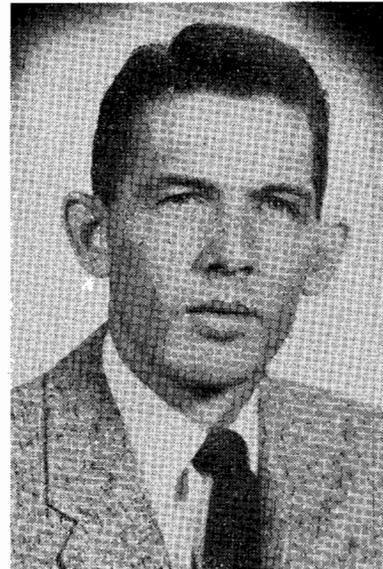
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The problem of explaining and interpreting the functions and purposes of a public health department has been a subject of interest to the International Association of Milk and Food Sanitarians for a number of years. The feeling has been expressed, upon a number of occasions, that an appreciation and understanding of public health can best be initiated at the secondary school level. At the annual Association meeting in 1955, at Augusta, Georgia, this problem was discussed, in relation to the Scholarship Fund. It was suggested that stimulation of students in high school to consider the career possibilities of public health might be helpful in attaining the ultimate objective of the Scholarship Fund.

The report which follows covers the period October-December 1955. It is based upon the experience of the writer in his work with the Clinton, Tennessee High School. It is hoped that this report will serve to demonstrate how contact can be made with school authorities, what procedures may be followed and what subject matter may be presented to better inform students of the objectives of a modern community health program.

Prior to the time this joint project was conducted, public health education had been confined to about two weeks of health study normally taken during the sophomore year. The health teacher observed that many of her students had the pre-conceived idea that a health department was a kind of welfare agency whose main function was to care for the poor and the medically indigent. With this misconception of pub-



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lic health in the minds of her students the teacher made inquiry at our department to learn what assistance we might render.