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Details:

(FORM UPDATED: 07/12/2010)

WISCONSIN STATE LEGISLATURE ... PUBLIC HEARING - COMMITTEE RECORDS

2005-06

(session year)

Assembly

(Assembly, Senate or Joint)

Committee on ... Public Health (AC-PH)

COMMITTEE NOTICES ...

- Committee Reports ... CR
- Executive Sessions ... ES
- Public Hearings ... PH
- Record of Comm. Proceedings ... RCP

INFORMATION COLLECTED BY COMMITTEE FOR AND AGAINST PROPOSAL

- Appointments ... Appt
- Clearinghouse Rules ... CRule
- Hearing Records ... bills and resolutions
(ab = Assembly Bill) (ar = Assembly Resolution) (ajr = Assembly Joint Resolution)
(sb = Senate Bill) (sr = Senate Resolution) (sfr = Senate Joint Resolution)
- Miscellaneous ... Misc



State of Wisconsin
Department of Health and Family Services

Jim Doyle, Governor
Helene Nelson, Secretary

February 4, 2005

The Honorable Alan J. Lasee, President
Wisconsin State Senate
17 West Main St., Room 401
Madison, WI 53702

The Honorable John Gard, Speaker
Wisconsin State Assembly
17 West Main St., Room 208
Madison, WI 53702

Re: Clearinghouse Rule 04-093
HFS 196 and Appendix, relating to restaurants and the Wisconsin Food Code

Gentlemen:

In accordance with the provisions of s. 227.19 (2), Stats., you are hereby notified that the above-mentioned rules are in final draft form. This notice and the report required by s. 227.19 (3), Stats., are submitted herewith in triplicate.

The rules were submitted to the Legislative Council for review under s. 227.15, Stats. A copy of the Council's report is also enclosed.

If you have any questions about the rules, please contact James Kaplanek at 608-261-8361.

Sincerely,

A handwritten signature in black ink, appearing to read 'Helene Nelson', written over a horizontal line.

Helene Nelson
Secretary

cc Gary Poulson, Assistant Revisor of Statutes
Senator Joseph Liebham, JCRAR
Representative Glenn Grothman, JCRAR
James Kaplanek, DHFS-DPH
Ron Hermes, DHFS Secretary's Office

**PROPOSED ADMINISTRATIVE RULES – HFS 196
ANALYSIS FOR LEGISLATIVE STANDING COMMITTEES**

Basis and Purpose of Proposed Rules

Section 254.62 (2) directs the Department to promulgate rules that establish a food sanitation manager certification program.

Section 254.71 (6), Stats., gives the Department the authority to promulgate rules that establish a fee for certifying and recertifying food service practices, that specify standards for approval of training courses for recertifying food protection practices, and that establish procedures for issuing certificates of food protection practices, including application submittal and review.

Section 254.74 (1) (a), Stats., authorizes the Department to administer and enforce the rules it promulgates relating to restaurants. Paragraph (d) of that subsection directs the Department to prescribe rules and fix standards, including rules covering the general sanitation and cleanliness of restaurants, the proper handling and storing of food on such premises, the construction and sanitary condition of the premises and equipment to be used, and the location and servicing of equipment.

Sections 93.07 (1) and 97.30 (5), Stats., are related insofar as they authorize the Department of Agriculture, Trade and Consumer Protection (DATCP) to regulate retail food establishments, such as grocery stores. DATCP promulgated ch. ATCP 75 under its authority in ss. 93.07 (1) and 97.30 (5), Stats. Both HFS 196 and ATCP 75 contain the same appendix entitled, "Wisconsin Food Code." The Department of Health and Family Services and DATCP are simultaneously promulgating these changes to the Wisconsin Food Code for their respective chapters of administrative code. These proposed changes will positively affect operators of retail food operations and the general public throughout the state by simplifying and clarifying the language of the Wisconsin Food Code, and will allow health inspectors to spend more time in complex or problematic food establishments, thereby promoting a safer public food supply.

The proposed order proposes revising ch. HFS 196, relating to restaurants, including its Appendix, known as the Wisconsin Food Code. The operator of every restaurant in the state must have a permit from the Department of Health and Family Services or an agent local health department before the restaurant may open for business and the restaurant must maintain its permit in order for it to continue operating. The permit signifies that the restaurant complies with the requirements in ch. HFS 196, which is intended to protect public health and safety. The requirements of this chapter are enforced either by the Department or a local health department that the Department has designated as the Department's agent.

The Wisconsin Food Code is modeled after the 1999 Food and Drug Administration (FDA) Model Food Code, which contains model requirements for safeguarding public health and ensuring food is unadulterated and honestly presented when offered to the consumer. It represents FDA's best advice for a uniform system of provisions that address the safety and protection of food offered at retail and in food service. Over 44 U.S. states and territories have adopted some version of the FDA Model Food Code and 9 states or territories are in the rulemaking process to adopt the FDA Model Food Code. The

Department, which regulates Wisconsin restaurants under ch. HFS 196, and the Department of Agriculture, Trade, and Consumer Protection (DATCP), which licenses and inspects retail food establishments, such as grocery stores under ch. ATCP 75, jointly adopted the Wisconsin Food Code in 2001 for their respective regulatory activities. A common Wisconsin Food Code for restaurants and retail food establishments ensures that the same rules will apply to all types of food establishments, including combinations. Although DATCP and DHFS (or their local agents) coordinate their activities so that a combined grocery store and restaurant is regulated by DATCP or DHFS, but not both, joint adoption and updating of the Wisconsin Food Code is still important for consistent regulation.

The FDA revised its Model Food Code in 2001. The Department proposes to update the Wisconsin Food Code to the 2001 FDA Model Food Code, which reflects the most currently available science and trends in food safety. In addition, the Department proposes to clarify or correct areas of the Wisconsin Food Code that do not reflect current Department policy. Revisions to the Wisconsin Food Code will also reflect modifications from both the Wisconsin Conference on Food Protection and the National Conference on Food Protection, as well as mutually agreed upon suggestions derived from two years of field application by both the Department and DATCP.

Response to Clearinghouse Recommendations

The Department accepted all of the comments made by the Legislative Council's Rules Clearinghouse and modified the order where suggested.

Effect on Small Businesses (Final Regulatory Flexibility Analysis)

The proposed rule changes clarify the existing rule's intent and, in some cases, gives restaurants increased flexibility to utilize current science in food safety. The proposed changes to ch. HFS 196 will have little or no fiscal impact on Wisconsin restaurants and will not add any business costs. The proposed rule changes principally clarify rule intent and allow flexibility for restaurant compliance.

Changes to the Analysis of Fiscal Estimate

Analysis

No changes were made to the analysis.

Fiscal Estimate

No changes were made to the fiscal estimate.

Public Hearing and Written Comment Summary

The Department and DATCP, Division of Food Safety held a joint public hearing via videoconference on the proposed rules. The hearing was broadcast to the following sites on October 7, 2004 from 9:30 a.m. to 12:30 p.m.:

Main Broadcast Center
Madison
UW Pyle Center
Room 227

Waukesha
Waukesha State Office Building
Department of Transportation Offices
Room 153

Appleton
Fox Valley Technical College
Room G1131

Wisconsin Rapids
Dept. of Transportation
Room 120

Eau Claire
Eau Claire State Office Building
Room 139

Spooner
WI DNR Northern Regional Office
Conference Room

The hearing was held jointly for the permanent rule HFS 196 and ATCP 75 and the common Appendix shared by both administrative codes, commonly referred to as the Wisconsin Food Code. Modifications were made to the rule based on written and oral testimony provided. The following staff was in attendance:

Greg Pallaske, Hearing Officer, Section Chief Food Safety and Recreational Licensing, Bureau of Environmental and Occupational Health

James Kaplanek, Evaluation and Training Officer, Food Safety and Recreational Licensing Section, Bureau of Environmental and Occupational Health

David Cammilleri, Evaluation and Training Officer, Food Safety and Recreational Licensing, Bureau of Environmental and Occupational Health

Tom Lietzke, Bureau Director of Food and Dairy Inspection, Division of Food Safety

Wayne Kopp, Technical Specialist and Evaluation Officer, Division of Food Safety (Facilitator at Madison site)

David St. Jules, Technical Specialist and Evaluation Officer, Division of Food Safety, (Facilitator at Waukesha site)

Arthur Ness, Technical Specialist and Evaluation Officer, Division of Food Safety

Glenn Goldschmidt, Technical Specialist, Division of Food Safety, (Facilitator at Appleton site)

Keith Krenz, Public Health Sanitarian, Western Regional Office, Bureau of Environmental and Occupational Health, (Facilitator at Eau Claire site)

Kathy Lembezeder, Public Health Sanitarian, Western Regional Office, Bureau of Environmental and Occupational Health, (Facilitator at Spooner site)

Amy Springer, Public Health Sanitarian, Wood County Health Department, (Facilitator at Wisconsin Rapids site)

Randy Wilson, Public Health Sanitarian, Wood County Health Department, (Facilitator at Wisconsin Rapids)

Larry Hanke, Food Safety Field Inspector, Division of Food Safety

Laurie Thomas, Food Safety Field Inspector, Division of Food Safety

The hearing record was left open until 4:30 p.m. on October 22, 2004, for receipt of written comments.

List of Public Hearing Attendees and Commenters

The following is a complete list of the persons who attended the public hearing or submitted written comments on the proposed rules. With each individual's name and affiliation is an indication of the individual's position on the proposed rule and whether or not the individual testified or provided written comments. The number preceding the name corresponds to the specific comment made in the attached summary of hearing comments.

| Name and Address | Position | Action |
|---|---------------------------------------|--|
| 1. Randy Wilson Wood County Health Department 184 2 nd Street S. Wisconsin Rapids, WI 54494 | Not indicated | Submitted Written Comments |
| 2. Amy Springer Wood County Health Department 184 2 nd Street S. Wisconsin Rapids, WI 54494 | Not indicated | Observation Only |
| 3. Susan Quam Wisconsin Restaurant Association 2801 Fish Hatchery Road Madison, WI 53713 | Supported the rule with modifications | Oral Presentation and Written Comments |
| 4. Kathi Kilgore Wisconsin Innkeepers Association 244 E. Mifflin St. Suite 101 Madison, WI 53703 | Supported the rule with modifications | Written Comment |
| 5. Erin Nutter | Not Indicated | Written Comment |

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| Division of Food Safety – Eau Claire Eau Claire, WI 54701 | | |
| 6. Larry Hanke Division of Food Safety W4831 Banner Road Chilton, WI 53014 | Not Indicated | Observation Only |
| 7. Laurie Thomas Division of Food Safety 828 E. Cecil Street Neenah, WI 54956 | Not Indicated | Observation Only |
| 8. Steve Steinhoff Division of Food Safety Madison, WI 53707 | Not Indicated | Written Comment |
| 9. Robert Harris University of Wisconsin – University Health Services 1552 University Ave Madison, WI 53705 | Not Indicated | Observation Only |
| 10. Richard Johnson University of Wisconsin – University Health Services 1552 University Ave Madison, WI 53705 | Not Indicated | Observation Only |
| 11. Natalie Vandervaled Outagamie County Health Department 401 S. Elm Street Appleton, WI 54911 | Not Indicated | Written Comment |
| 12. Loyce Robinson City of Milwaukee Health Department Municipal Building 841 N Broadway Room 105 Milwaukee, WI 53202 | Not Indicated | Oral Presentation and Written Comment |
| 13. Tommye Schneider City of Madison Department of Public Health 210 Martin Luther King Jr. Blvd. Madison, WI 53709 | Not Indicated | Written Comments |
| 14. Jim Blackmore City of Madison Department of Public Health 210 Martin Luther King Jr. Blvd. Madison, WI 53709 | Not Indicated | Observation Only |
| 15. Elizabeth Temple Concerned Citizen 725 Acker Parkway Deforest, WI 53532 | Not Indicated | Written Comments |
| 16. John Powell FDA 501 N, Riverside Drive RM 203 Gurnee, IL 60031 | Supported the Rule | Written Comments |

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| <p>17. Ron Hermes Consumer 117 Coach House Drive Madison, WI 53714</p> | <p>Supported the rule with modifications</p> | <p>Oral Presentation</p> |
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Summary of Public Hearing Testimony and Written Comments, and Department Responses

| Rule Reference | Comment | Department Response |
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| <p>General</p> | <p>This code needs a topical word index with page/code reference to easily find provisions. This is an essential inclusion for the benefit of all persons who need to access it. [15]</p> | <p>The Department of Health and Family Services and the Department of Agriculture, Trade and Consumer Protection agree that this is an excellent recommendation and will begin development of an index once the current proposed rule changes have been adopted.</p> |
| <p>General</p> | <p>I continue to have concerns about this code becoming an ever expanding best practices-SOP handbook rather than just enforceable regulations. It needs to be limited to measurable and enforceable provisions of the greatest public health significance. Making regulations more complex is not necessarily in the best interest of public safety. DHFS and DATCP need to make the regulations as simple and in plain language as possible in order to best serve the needs of the targeted persons directly affected by them, the industry, regulatory personnel and indirectly, the General Public. Please move in that direction. Please make these regulations measurable so that the industry and regulatory programs can easily track progress in making changes that affect budgets, personnel and policy and most importantly behaviors. Tracking CDC Risk Factors remains a difficult process. CDC risk factors are only a small subset of the code's countless provisions. Please consider the perspective of the industry, when these are the only focus of your regulatory programs. When these are your focus, why have such a</p> | <p>No change. Food safety encompasses more than just enforcement actions, in today's regulatory environment education and training are just as important as enforcement. The Wisconsin Food Code is more than just a black and white document that enforces critical food safety violations. The Wisconsin Food Code covers all food safety issues and provides industry with sound science to help them make decisions regarding food safety concerns in their food establishments. The Wisconsin Food Code is more detailed to remove any gray areas that existed with previous Wisconsin food regulations. This allows food establishment operators a better understanding of food safety requirements in the the State of Wisconsin. The language in the Wisconsin Food Code is simple and in many instances gives food establishment operators acceptable alternatives for meeting food safety requirements. The focus of inspections has shifted to a risk</p> |

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| | <p>cumbersome code? Again the dependence that industry has on regulatory programs, affects their view of the “rest of the regulations” as unimportant. [15]</p> | <p>based inspection approach rather than the old inspection method of looking at walls, floors, and ceilings. This has enabled inspectors and operators to focus more on food processes and procedures that directly affect food safety. Tracking these CDC risk factors can help better define what areas in food safety that inspectors and operators need to place their focus. This has never been accomplished before and the departments are excited about the ability to track data statewide to better provide training and education to our food establishment operators. Good manufacturing practices are important and contribute to the overall food safety operation, but the main focus of inspections must be to prevent those risks known to have contributed to foodborne illness.</p> |
| General | <p>Please research other agencies’ laws regarding a particular referenced provision before placing a provision in this administrative code. There may be surprises. DATCP/DHFS must have knowledge that another agency addresses the issue. [15]</p> | <p>The Department of Health and Family Services and the Department of Agriculture, Trade and Consumer Protection agree. The Department of Natural Resources and the Department of Commerce were contacted to assure that all references were correct and accurate.</p> |
| General | <p>The industry must look to other sources of good business practices and research all the other federal and state laws pertaining to their businesses, practices, and protection of food. The industry cannot afford to depend on the regulatory authority for everything it needs to know about its businesses. Moreover, state and local government regulatory personnel and services are declining as fiscal resources become depleted. [15]</p> | <p>No comment necessary. The comment does not address Wisconsin Food Code, ch. HFS 196 or any of the proposed revisions.</p> |
| General | <p>Please consider removal of chapters of</p> | <p>No change. During the code</p> |

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| | <p>this code that are unused or otherwise redundant with other Wisconsin administrative codes, such as Chapter 8, Public Toilet Rooms. Concern for Public Toilet rooms need not be in a food code. [15]</p> | <p>revision process this subject was brought up to the Food Code Review Committee. This committee consisted of State and agent health department staff as well as industry and academia. The majority of the sections in Chapter 8 reflect requirements by DHFS for public toilet requirements in food establishments. The sections that reference the Department of Commerce requirements are included for ease of reference for food establishment operators. The concensus of the committee was that it was helpful to have a chapter specifically dealing with public toilet rooms separate from food employee toilet room requirements.</p> |
| General | <p>Consider the specifics of allowances for non-ANSI equipment (microwave ovens, chest freezers, etc.) [15]</p> | <p>No change. The Department of Health and Family Services and the Department of Agriculture, Trade and Consumer Protection do not feel that listing specific allowances for different types of equipment is practical. A variance procedure already exists in the Wisconsin Food Code. A joint committee from both departments called the Equipment and Variance committee already exists to review and approve non-ANSI equipment acceptable for use in Wisconsin.</p> |
| General | <p>Assess-this code for what is intended to be "grandfathered" and what is not. State that processes, procedures, operations, behaviors, maintenance, and cleaning are not grandfathered. Perhaps approvals, records, variances, equipment, construction and installations may be if they were approved by the department or its agent on the date of installation. Include a requirement for documentation for the date of installation/occurrence from the operator if something can be challenged</p> | <p>No change. These issues have been adequately addressed by the definitions in the Wisconsin Food Code for "new" and "existing". All provisions in the Wisconsin Food Code are grandfathered unless otherwise specifically stated.</p> |

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| | based on public health significance by the regulatory authority. [15] | |
| General | There is nothing more essential for both agencies at this time than standardizing your staff and local regulatory staff and trainers of Food Service Manager Certification in these regulations to enhance uniformity. May I suggest a combined fiscal effort with Industry groups to do the same for the database of Certified Food Managers? A training CD ROM of a typical standardization exercise, also available on the DHFS/DATCP's websites, would go a long way for Certified Food Service Managers and encourage industry's support for modifications to the FSMC program including fee increases. [15] | No change. Changes to the food manager certification program have not been proposed in this rulemaking. |
| General | There needs to be an enforcement chapter in the WFC that brings together a common approach for both agencies to the correction of the same violations for reasons related to uniformity, standardization, public and industry expectations. The Retail Food and Food Service Industries needs to have this chapter to prioritize activities and to interpret the expectations of the Regulatory agencies. Examples of this include but are not limited to: how to interpret the words "critical, non-critical, and swing"; handling waivers and modification requests, where DHFS/DATCP, not the local, has the only authority; submitting HACCP plans; responsibilities of applicants; responsibilities of the permit holder; performance and risk based inspections; documentation information and observation; inspection protocols; closures; preventing foodborne disease transmission; common enforcement protocols, etc. This could be a simple adaptation of the federal model food code's chapter 8. It needs support, commitment and direction from both | The Department of Health and Family Services and the Department of Agriculture, Trade and Consumer Protection agree with this comment in concept. However, due to the complexity of two different statutes this cannot be accomplished during this code revision. The comments will be taken into consideration for future policy or Memorandum of Understanding development. |

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| | agencies' legal staff. Defining expectations for the Industry is the first step to achieving the intent of this common code and providing additional safeguards for the public. Agent local health departments gain additional direction with this chapter. [15] | |
| Wisconsin Food Code 1-201.10 (B) | Define "Food Spills". [15] | No change. This issue is adequately addressed in Wisconsin Food Code section 3-304.14 |
| Wisconsin Food Code 1-201.10 (B) | Provide a definition of "Frozen". [15] | No change. This is a training issue for the Department of Health and Family Services and the Department of Agriculture, Trade and Consumer Protection. The comments will be forwarded to the Food Code Fact Sheet Committee. |
| Wisconsin Food Code 1-201.10 (B) | Add a section on Ice Making, Storage, Dispensing and Handling. [15] | No change. Since ice is defined as a food, no additional sections are required. The Wisconsin Food Code adequately addresses food storage and dispensing. |
| Wisconsin Food Code 1-201.10 (B) | Where does this code discuss exemptions for foods that are irradiated? [15] | No change. There are no exemptions regarding irradiated food. Irradiated "Beef" is only a 5 log reduction of pathogens, the cooking requirements are based on a 7 log reduction. Irradiated foods are handled just like any other raw animal food. FDA is in the process of reviewing food code requirements for irradiated foods. |
| Wisconsin Food Code 1-201.10 (B) | Remove all references to "Limited". [15] | The Department of Health and Family Services and the Department of Agriculture, Trade and Consumer Protection agrees. The term "limited" has been deleted and replaced with the term "pre-packaged" in reference to restaurant type. |
| Wisconsin Food Code 1-201.10 (B) | Please modify your MOU with DHFS to reflect your new code inclusions. "Meal" is and has been a distinguishing hallmark that separates DATCP from | The Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection |

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| | <p>DHFS. Without it, you have taken away the need for two agencies and what distinguishes the “restaurant” program from the retail food program. If it relates to licensing, it needs to be removed from the body of the WFC. By removing “individual pastry items generally sold with a beverage” we will have to change the coffee shops that only serve coffee and pastries from restaurants to retail stores. Additionally there will be lots of record keeping changes that will have to be made at the Health Departments. And finally, these establishments that were required to have Certified Operators will no longer have to have one because the DATCP rules are different. I thought the adjustments between DATCP and DHFS were done when we went to a one-license system. It is a major nuisance to have these licenses going back and forth between the two agencies. Additionally the difference in the requirements of Certified Operators between the two agencies is problematic. We want to see as many Certified Operators out there as possible, not fewer. [13] [15]</p> | <p>recommend no change to the proposed rule. Over the past years there has been much inconsistency in determining the correct way to license food establishments. The proposed rule change to the definition of "MEAL" was a needed change to simplify the difference between a "Retail Food Store" and "Restaurant." A Memorandum of Understanding that expands this discussion and also further clarifies the position of the Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection with respect to licensing requirements has been drafted.</p> |
| <p>Wisconsin Food Code 1-201.10 (B)</p> | <p>Definition of Mobile food establishment has added, "requires a service base to accommodate the unit for servicing, cleaning, inspection and maintenance." What about those units that had been approved for operation without a service base? Also, this paragraph says "...means a restaurant or retail food establishment...." but the next paragraph, 1-201.10(B)(53m)(b), says, "mobile food establishment does not include...a traveling retail food establishment." What is the difference between mobile food establishment (retail food establishment from a movable vehicle)</p> | <p>The definition of “mobile food establishment” has been changed to provide better clarification.</p> |

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| | and a traveling retail food establishment? - This definition section seems unclear and possibly even contradictory. [1] [15] | |
| Wisconsin Food Code 1-201.10 (B) | Better definition: "New" means, as of this moment, never having been used, operated, constructed or issued in reference to equipment, process, establishment or a permit issued by the department or its agent. (Review all references using the word "new" to make sure it is used in the correct context.) [15] | No change. The term "new" is defined adequately in the Wisconsin Food Code as well as in policy developed by the Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection. |
| Wisconsin Food Code 1-201.10 (B) | Define "Prepackaged" in reference to "Prepackaged" licensing requirements for only foods in this category. [15] | The definition of "prepackaged" has been removed from the Appendix (Wisconsin Food Code) and placed in ch. HFS 196. |
| Wisconsin Food Code 1-201.10 (B) | Define "Risk Factor". [15] | The term "risk factor" has been defined and clarified. |
| Wisconsin Food Code 1-201.10 (B) | Take out the definition of "Special Organizations Serving Meals". It is a licensing issue. Take out the associated chapter pertaining to it as contained in a previous written comment. [15] | The Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection agree that Special Organizations Serving Meals is a licensing issue. Provisions relating to Special Organizations Serving Meals have been moved from the Appendix to ch. HFS 196. |
| Wisconsin Food Code 1-201.10 (B) | Remove the definition of a "vending machine". WAC HFS 198 addresses food vending. There is an existing WAC on Food Vending in WI, WAC Chapter HFS 198 Vending of Food. The only reference to HFS 196 Restaurants that is in HFS 198 concerns Vending Machine Commissaries (HFS 198.04(3)). Remove all other references in the WFC regarding vending machines. Since only DHFS has a statutory reference to "Vending machine", remove it from the WFC. WAC Chapter HFS 198 has had a higher standard for temperature for the storage of vended food in vending machines. Eliminate these duplicative provisions in the WFC. [15] | The Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection suggest a change to temperature requirements for vended food in HFS 198. FDA and the Conference for Food Protection have agreed that a hot holding temperature of 135° F is sufficient to prevent bacterial growth. This has been documented through scientific studies. A higher temperature standard is not required for public health and safety. HFS 196 Appendix addresses vending machines in general terms whereas HFS 198 specifically addresses |

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| | | <p>vending machines and vending machine commissaries. The Departments recommend the following changes to provide consistency to industry and promote consistency with food temperature standards:</p> <ol style="list-style-type: none"> 1. Incorporate the Wisconsin Food Code hot food holding temperatures into HFS 198. 2. In the Wisconsin Food Code, change the definition of Vending Machines to reflect Statute 254.61(7). |
| Wisconsin Food Code 2-201.12 & 2-201.13 | <p>WRA supports the changes to section 2-2, in which food employees with symptoms of vomiting and diarrhea are to be excluded from working in food establishments until 24-hours after their symptoms cease. We request that the departments develop training and/or fact sheets for their inspectors and agent health departments which clearly explain this change and how they are to enforce the new requirement. We feel it may be unclear to the inspectors and agents that the employer has the authority to allow these employees to return to work, which is different from the process of allowing employees diagnosed with infectious agents to return to work. [3]</p> | <p>No change. This comment will be sent to the Wisconsin Food Code Fact Sheet Committee for consideration.</p> |
| Wisconsin Food Code 2-201.12 (B) & (C) | <p>Retain “or other pathogens, which can be transmitted through food” for all the unknowns. [15]</p> | <p>No change. WFC 2-201.12 addresses what food employee illnesses must be reported to the person in charge and when a food employee is restricted or excluded from the food establishment. The proposed revision to remove the statement “or other pathogens” was based on recommendations by the Department of Health and Family Services Bureau of Communicable Disease.</p> |

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| <p>Wisconsin Food Code 3-201.11 (B)</p> | <p>Official comments about the proposed rule— I don't know if as administrator of the division of food safety I need to go on record, but to ensure that the process does not preclude the following comments being considered, I offer them for the public hearing record. Though I do not believe we should expend limited resources routinely monitoring events that present a low food safety risk (e.g., bake sales), I think it is not good public health policy to exclude these activities from coverage by the retail rule. Additionally, I also believe it is a poor practice to make rules by exception. Though we may not wish to devote resources to routine surveillance to these types of activities, I do not believe we should abdicate our public health responsibilities. If the DATCP and DHFS desire to codify processing of non-potentially baked good processed in unlicensed facilities, we should provide direction not just, as they say, "let the prisoners go free." For these reasons, I believe the division should not include the proposed new language contained in Chapter 3 - Ref. 3-201.11(B) that reads: " except that bake sales conducted by licensed or unlicensed nonprofit organizations such as churches; religious, fraternal, youths' patriotic organizations, service clubs, and civic organization may offer for sale or service non-potentially hazardous baked goods processed in an unlicensed facility (i.e., home, school, or sponsoring organization kitchen." [8] [15]</p> | <p>The Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection agree. The proposed exemption has been deleted. The Department of Agriculture Trade and Consumer Protection will create policy concerning bake sales.</p> |
| <p>Wisconsin Food Code 3-201.17</p> | <p>Game Animals -(B)(2) Many confusing statements and words: The statute (29.541) is referenced here. It needs to be stated verbatim, as follows; otherwise it will be misinterpreted as your proposed</p> | <p>Section 3-201.17 Game Animals was resolved by the Policy and Interpretation Committee and the proposed language was approved by both the Department of Health and Family Services and the</p> |

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| | <p>language indicates.</p> <p>“29.541 Serving of game to guests. (I) PROHIBITION. (a) ~ innkeeper, manager or steward of any restaurant, club, hotel, boarding house, tavern, logging camp or mining camp may sell, barter, serve or give, or cause to be sold, bartered, served or given, to its guests or boarders any of the following:</p> <ol style="list-style-type: none"> 1. The meat of any deer, elk, bear, squirrel, game bird, or game fish taken from inland waters at any time. 2. The meat of any wild animal not listed in subd. 1., during the closed season for the wild animal, whether the meat is of a wild animal lawfully or unlawfully taken within or without the state. <p>(b) The department (DNR) may issue permits authorizing the serving of lawfully taken and possessed wild animals at any time.</p> <p>(2) FREE LUNCH. The giving, offering, or affording opportunity to taken free lunch in any of the places name in sub. (1) is embraced within the prohibitions of sub. (1).</p> <p>(3) Exemption. This section does not apply to the meat from farm-raised deer, farm-raised fish, or farm-raised game birds or to meat that is subject to regulation under s. 169.14.”</p> <p>My comments:</p> <p>-The DNR does not inspect the wild game meat. It really has no authority to allow service of wild game in restaurants no matter what the circumstances. Ss 29.935 stats. is very puzzling. The FDA GUIDANCE annex 3-201.17 states that “wild game animals may be available as a source of food only if a regulatory inspection program is in place to ensure that the wild animal is safe.”</p> <p>-How can the DNR approve the service of uninspected meat to be sold in</p> | <p>Department of Agriculture, Trade, and Consumer Protection. DHFS has met with DNR and revised the wild game permit process. The Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection agree that some language is confusing and have changed this section to provide better clarification. Section 3-201.17 of the Wisconsin Food Code provides guidance that must be followed for service of wild game to private gatherings in a licensed food establishment.</p> |
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another state agency's regulated establishment to the General Public when there are already federal and state laws that prohibit the service of unnspected meat to the general public from these establishments? (Ss 29.935(2), stats.) (Ss 97.43, stats.)

b) is not an exception to (a)

- Return to the previous code language and define "private gathering".
- DHFS/DATCP needs to get a handle on who is responsible for the DNR permit and match that person with who is preparing the wild game food. They really need to be the same person. Otherwise this could really get out of hand!
- Reserve your language, if necessary, for a policy.
- Needs interpretation of "or caused to be sold, bartered, served or given to its guests". My interpretation of this DNR language is that it is still prohibited if a tavern operator allows a hunter (who may have a lawful DNR permit to serve) to use his premises even for a private patty. Is a private party attendee still a guest of the tavern? From an insurance and liability perspective, I would think so.
- The proposed WFC language is too confusing and gives the impression to the licensed operator that service of wild game in his/her licensed facility is OK if they follow (1)-(9).
- Verify if the DNR issues permits to individuals not to businesses.
- It is not advantageous for DHFS/DATCP to be interpreting DNR's policies for issuing permits. Consider Language such as:"If DNR authorizes the service(via a permit) of wild game... by a person, these are the considerations: [who (not a DHFS licensee), how often (exempt groups only-fewer than four days in twelve

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| | <p>months), to whom (private party), where (a closed off room/space), what it is, and how and where is it prepared.</p> <p>-DHFS spares the “exempt group” from licensure, so the Regulatory Authority won’t be involved in what they do unless it (processing and preparation) happens at a licensed establishment which is supposed to be prohibited in Ss 29.541.</p> <p>-There is no definition of “private” in your definition section. “Private groups” are still the “General Public” when they are in DHFS/DATCP licensed establishments.</p> <p>I have concerns with the processing of wild game in any form in any of DHFS/DATCP licensed food establishments, especially by nonprofessional food processors whether the operator claims responsibility for it or not. Wild game animals are carriers of viruses, rickettsia, bacteria and parasites. Exposure to other foods, persons and surfaces in licensed establishments is a real concern. [15]</p> | |
| <p>Wisconsin Food Code 3-203.11 (D)</p> | <p>Code states that shucked shellfish may be removed from the container in which they were received and repacked in consumer self-service containers. Was this meant to be a consumer self-service operation or do they mean to say single service container? Sounds like bulk, customer self-service. This section is unclear. [13]</p> | <p>The Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection agree that the wording is confusing and have revised the language to make the proposed provision clearer.</p> |
| <p>Wisconsin Food Code 3-301.11</p> | <p>The following comments reflect the general statements concerning Bare Hand Contact with RTE foods: Section 3-301.11: This is not an improvement over what we have now. It's still confusing for the public who see some food employees wearing gloves and others are not. I believe this</p> | <p>The Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection agree that handwashing is already mandated in the Wisconsin Food Code. The proposed provision will provide specific requirements for those food</p> |

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| | <p>is burdensome for regulators and will not be enforced. As our resources decrease staff will not have time to verify the documented program referred to in 3-301.11 (3). Also these plans don't mean anything if they are not followed. In other words, an operator can create a great plan and never use it and we will never know because we are only in an establishment about once a year.</p> <p>I'd like to see us go back to minimizing bare hand contact with ready to eat food by requiring the use of utensils, etc. and effective hand washing. The use of gloves works well in an environment where an employee is responsible for handling a single ready to eat food item on an assembly line.</p> <p>WRA feels the changes to section 3-301.11 of the code, which removes the formal approval process for touching ready-to-eat foods with bare hands and clarifies the requirements that must be met for bare-hand contact to occur, is a step in the right direction. However, we do feel that a mandatory hand-washing training program in place of the current and proposed provision is a more proactive approach. Repeated studies have shown that gloves, tongs and other barriers do not guarantee uncontaminated food, but that frequent, thorough hand washing is the best method.</p> <p>A note is present, in the proposed changes, stating that availability of a template for food establishments to use when developing a program. At this time, a template is currently available for food establishments to achieve a similar purpose. However, the document is cumbersome and it has been proven to be challenging for some food establishments. As a result, I am recommending the template be</p> | <p>establishment processes where "no bare hand contact" with ready to eat foods is impractical due to preparation/process of the food item. This section has been modified to better clarify. Provisions in WFC 3-301.11 need to be validated under a risk based inspection.</p> <p>This provision provides specific requirements for those food establishment processes where "no bare hand contact" with ready to eat foods is impractical due to preparation/process of the food item.</p> <p>Concerning template modifications, the Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection will take the comments into consideration when developing a new template.</p> |
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| | <p>reviewed. It is my suggestion that the template included the following: It is my suggestion that the template included the following: -</p> <ol style="list-style-type: none"> 1. A list of tasks or workstations that will have bare hand contact with ready-to-eat foods. (Eliminate the need to list specific foods, such as cheeses and deli meats). 2. It would be suggested to have the facility include a summary defining which items are raw in a workstation that has bare hand contact with ready-to-eat foods. Include the type of method used to handle those raw items (gloves, tongs or direct contact with handwashing) 3. It would also be recommended to include in the program, areas where food employees would not have direct contact with ready-to-eat foods. To ensure proper training for handwashing, employee health and cross-contamination, fact-sheets should be present in the template to address those issues. - 4. A sign-off sheet that documents each food employee who has received the proper training. - 5. A sign-off sheet that documents each manager who has received the proper training regarding the maintenance of the program and monitoring of food employees. - 6. Frequency of refresher training sessions. [12], [3] [11], [1], [13] | |
| <p>Wisconsin Food Code 3-303.12 (E)</p> | <p>3-303-12(E) states that canned beverages displayed in ice water must not have their tops submerged even though there also must be a 50ppm chlorine residual. Isn't that a little over kill. Who cares if the top is submerged if there is a chlorine residual. The purpose of storing beverages this way is that you can keep a lot of cans ice cold in a relatively small space i.e. a barrel.</p> | <p>The Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection agree. The requirement has been deleted.</p> |

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| | <p>But why bother if all you can have is a single layer in the barrel? Basically we're saying don't do this. I think its stupid. Cans aren't even that protected in a warehouse.</p> <p>Secondarily, if they are in a display unit that has a drain so the water drains out and the cans only touch the ice this doesn't apply. How this any better or worse than ice water? [5]</p> | |
| Wisconsin Food Code 3-304.14 | <p>Wiping Cloths The cloth used to clean tables and miscellaneous surfaces is not a food spill cloth. Perhaps this needs to be stated since this is a notorious way to spread contamination. The code needs to distinguish these functions. I suggest that the references be changed too "Spill cloths versus Cleaning cloths". Keep them separate. [15]</p> | <p>No change. The Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection believe that the term "food spill" is self-explanatory.</p> |
| Wisconsin Food Code 3-306.13 (A) | <p>Is raw shellfish for consumer self-service allowed only at salad bars or also allowed in retail bulk self-service? 3-203.11(D) makes it look like retail bulk self-service is acceptable. [13]</p> | <p>No change necessary. It is allowable to sell raw frozen shell on shrimp in bulk self-serve at retail only.</p> |
| Wisconsin Food Code 3-404.11 | <p>Treating Juice. (B)(2) This warning label language is too harsh. Suggest: UNPASTEURIZED: May Contain Harmful Bacteria. [15]</p> | <p>No change. The proposed language is based on the FDA 2001 Model Food Code language.</p> |
| Wisconsin Food Code 3-501.16 (C) | <p>Section 3-501.16(C): My recommendation is that this provision be removed from the proposed code. I think it establishes a bad precedent and will be extremely difficult to enforce. It would be better to let the FDA test it and based on their experience we could consider it with our next revision. Also, 3-501.16 (C) (1) is not clear. Does it mean that food is to be discarded if found above 70 degrees without questioning how long it has been above 70.</p> <p>How are we to determine when product is removed from temperature control</p> | <p>No change. The provision of Time as a Public Health Control has been in the FDA code since 1993 and has been validated in science. This is simply a modification of Time as a Public Health Control, for cold hold only. During inspections food items found above 70 degrees are discarded. The provisions of this section need to be validated under a Risk based inspection. 3-501.16 provides detailed instructions for food establishments that want use time as a public health control for cold holding.</p> |

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| | and time starts? How do we determine if the food was thrown away after 6 hours? This is a very important food safety item and does not seem to be able to be adequately monitored from an inspection standpoint. There is to be an internal system but does not say what type. [12], [1], [13] | |
| Wisconsin Food Code 3-501.17 | RTE-Date Marking (B)(2) How does the food establishment operator know the food manufacturer's intent for the use-by date based on food safety? [15] | No change. Best practices include not selling food beyond the manufacturer's expiration date. FDA's recommendation is that datemarked Ready to Eat Food shall not be used past manufacturer's expiration date. The concept of Datemarking is currently being reviewed by FDA and USDA and the Conference of Food Protection. |
| Wisconsin Food Code 3-602.11 | Wants to include the oils for the allergen products. What was the impetus for including the Federal Food, Drug, and Cosmetic Act (FFDCA) language for labeling for food allergies and adverse reactions? An entire set of additional regulations! Please keep it out of the Wisconsin food code. [17], [15] | These comments refer to explanatory notes provided with the provisions. These notes serve informational purposes only and are not part of the substantive law created by rule. Nevertheless, the Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection agree to include unrefined oils in the first note regarding allergens. However, no change will be made to the second note with respect to adverse reactions. This note refers to food sensitivities not food allergens. Any changes to proposed rules concerning allergens and sensitivities will be considered upon FDA recommendations for proposed code language. |
| Wisconsin Food Code 3-603.11 | Disclosure can no longer be verbal. It must now be in writing. We have been requiring the disclosure in writing all along. Does each menu item that is under-cooked or made with raw eggs, etc. have to state such on the menu? Example: Caesar salad - made with raw | Disclosure and Reminder must be written and that is what is proposed. The written Disclosure or Reminder maybe presented by means other than the menu. Disclosure and Reminder can be accomplished in three different ways as specified in |

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| | <p>eggs. Proposed changes to section 3-603.11 (Consumer Advisory) requires operators to inform customers of the increased risks of consuming raw or undercooked meats, poultry, seafood, shellfish or eggs. We feel that the current provision that requires operators to disclose the use or availability of raw or undercooked animal foods is sufficient. We have found that consumers do not want to be “lectured” when dining out and most are usually aware of the risks associated with eating animal foods in raw or undercooked forms. We also wish to point out that the Food and Drug Administration’s own consumer focus group research determined that the majority of consumers do not wish to see these types of warnings in restaurants.</p> <p>We feel that compliance with this requirement will be difficult for catering and banquet operations. In order for these operations to comply, many would have to post the reminder in the establishment. We believe that very few consumers wish to see warnings posted in the establishments they have chosen to celebrate special events, such as weddings and holiday parties. This type of posting would be unfair to these types of operations, especially when compared to other operations that may use other, less conspicuous means of communication. Operations with posted menu boards may also have similar difficulties and disadvantages. [3], [4], [13]</p> | <p>the proposed changes in the Final proposed order. The Department of Health and Family Services met with the Wisconsin Restaurant Assn. to address their concerns and the Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection have accepted their recommendations for suggested language changes.</p> |
| <p>Wisconsin Food Code 4-204.117 (A)</p> | <p>There seems to be no grandfather exemption for the automatic dispensing of detergents as well as sanitizers. A lot of our establishments hand-feed detergent into the dish machine. This is mainly with under-counter machines.</p> | <p>DHFS consulted with the Wisconsin Restaurant Assn. and industry on this issue and conversion to automatic dispensing of detergents is an inexpensive procedure. The Department of</p> |

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| | Can all machines be modified to dispense powder or liquid detergents? How much time would we give them to convert machine? [13] | Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection have clarified the section to indicate the provision applies to new operators and change of operators in food establishments. |
| Wisconsin Food Code 4-301.16 | Food Preparation Sinks (B) Needs to read "Existing food establishments, not undergoing a change of operator. [15] | No change. The proposed language clarifies the requirement for a food preparation sink. |
| Wisconsin Food Code 4-502.11 | Good Repair and Calibration Location of language regarding method and frequency of calibration? Especially needed in light of the close to no margin of safety for hot holding. (Calibration needed after lack of use or physical shock due to temperature extremes, dropping onto a hard surface, other abuse, etc.) Mention types of methods of calibration. [15] | No change. This is a training issue. The comment will be sent to the Food Code Fact Sheet Committee to be addressed. |
| Wisconsin Food Code 5-101.12 | System Flushing and Disinfection Please check this reference to make sure it is DCOMM and not the DNR WAC Chapter NR 812.41 that you intend. [15] | No change. The language used in the provision was provided by the Department of Commerce. |
| Wisconsin Food Code 5-202.12 | Standards Suggested language: (In addition to any mention of conformance with the water quality standards of WAC NR Chapter 809), "Water, intended for human consumption, derived from private wells, shall be sampled at least annually by competent staff and samples analyzed by state approved laboratories for the presence of coliform and level of nitrates. Records of the analysis results shall be maintained on the licensed premises and available to all appropriate regulatory authorities. Levels exceeding the drinking water quality standards of the Department of Natural Resources shall be acted upon immediately and the protocols of the Department of Natural Resources shall be followed. Operators | No change. The subject of the comment is an enforcement issue for the DNR. |

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| | <p>shall provide potable water (for all ingestion purposes and to all persons) from another approved and tested source upon notification of drinking water MCL exceedance. (Operators are not allowed to boil their water intended for ice, drinking or for other culinary purpose.) [15]</p> | |
| <p>Wisconsin Food Code 5-202.12</p> | <p>Non-hand Operated Faucets Suggested language: "At a newly constructed establishment, additional handsink installations at existing establishments, or when faucet/activation assemblies are replaced, the activation means shall be non-hand operated. This paragraph changes when a hands-free handsink is required and says ONLY AT NEWLY CONSTRUCTED FOOD ESTABLISHMENTS OR WHEN A HANDSINK IS REPLACED OR INSTALLED. - - I believe this change is a mistake from both a public health standpoint and from an enforcement standpoint. Previously, the code has required a hands-free operated handsink (which has been enforced for not only all new establishments, and all new and replacement sinks, but also for ALL REPLACEMENT FAUCETS, AND AT CHANGE OF OPERATOR) To change it to this, which ONLY requires it at newly constructed establishments or new or replaced sinks is a huge step backwards. From a public health standpoint, we should hold the line to require this for all new establishments and sinks, as well as for all replacement sinks AND REPLACEMENT FAUCETS, AND ALSO AT CHANGE OF OPERATOR. From a strict enforcement standpoint, requiring it for replacement sinks will be impossible to keep track of because we won't know</p> | <p>The Department of Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection agree and have made changes to provide better clarification..</p> |

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| | <p>when a sink is replaced. Also, many times the sink is not replaced, just the faucets are. Since it specifies, "when a handsink is replaced" they could replace faucets virtually forever and never have to go to a hands-free set-up. Let's keep this the way we've been enforcing it and require it at CHANGE OF OPERATOR as well as any time a sink OR FAUCET is replaced. [15], [1]</p> | |
| <p>Wisconsin Food Code 6-201.19</p> | <p>Can an establishment have a reach-in cooler by a back door that is frequently used by the public? Isn't this a food storage area? A number of restaurants have refrigerators in hallways leading to back door. Some of these are public entrances. [13]</p> | <p>Yes, food establishments may have coolers by public entrances as long as the food is adequately protected. The Department of Health and Family Services and the Department of Agriculture, Trade and Consumer Protection have clarified the language in section 6-201.19.</p> |
| <p>Wisconsin Food Code 7-204.11</p> | <p>Remove the verbiage: "and other chemical antimicrobials". DHFS does not test general antimicrobial detergents/soaps/hand sanitizers, etc. DHFS efficacy tests products that are designed and intended as final step sanitizers or when identical products are used as both detergents/sanitizers in the wash, then sanitize procedure (4-301.12(D)(2)(c)) or as used in wiping cloth storage (3-304.1 4(B)(2)). Efficacy testing has been done on food contact sanitizers by DHFS as a quality control concern that benefits the food service, dairy industry and consumer. Many factors affect the effectiveness of stored sanitizers, including temperature, time and light. A side benefit of DHFS testing is the monitoring of formulation consistency. The testing is done on final step sanitizers because it is the final step in the cleaning process to assure that the product has the capacity to kill 99.99% of pathogenic organisms on a food contact surface. DHFS simply does not test soaps, hand sanitizer, detergents and similar</p> | <p>The Department of Health and Family Services and the Department of Agriculture, Trade and Consumer Protection agree and have clarified the language.</p> |

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| | antimicrobials. Remove “and other chemical antimicrobial” from 7-204.11 as it is simply not correct. [15] | |
| Wisconsin Food Code 9-102.11 | Remove automatic waivers, especially those in Chapter 9 Mobile Food Establishments. Waivers should only be granted by appropriate Regulatory Officials. This diminishes the intended effects of why the state has regulations. [15] | No change. This issue was resolved by the Policy and Interpretation Committee, which consists of State staff, local health Department Agents, Industry and Acadamia. The proposed language was approved by both the Department and Health and Family Services and the Department of Agriculture, Trade, and Consumer Protection. |
| Wisconsin Food Code 10-104.11 (C) | 10-104.11(C): This permits a temporary food establishment to "return equipment and utensils to an APPROVED facility at the end of the day for warewashing. How will this be enforced considering one day events, or events close to another jurisdiction, i.e. a neighboring county, where the operator says they are returning to a church or other facility for warewashing. Since it's in another jurisdiction the on-site sanitarian will not have any knowledge of this facility. While this may be practice in many jurisdictions it is typically limited to facilities the on-site sanitarian is aware of; this seems to open it up and could result in some unsafe practices. [1] | No change. Return of utensils to an approved site for cleaning and sanitizing is always the preferred method for warewashing. Sanitarians must learn to communicate with other jurisdictions as temporary events become more complex. This is a training issue and will be handled during the process of standardization of inspectors. |
| Wisconsin Food Code Chapter 11 | Chapter 11 is essentially a licensing chapter and needs to be eliminated from the WFC and from the definition in WAC Chapter HFS 196.03(6). WFC Chapter 11, and the definition (1-201.10(83m))unique to its application to DHFS, only exists for 21 operators, state wide(includes ALPHDs). It only applies to operators who perform food service from 4-12 days within a 12 month period. These operators are otherwise exempt from the Statutory definition of a “restaurant” if they confine their food service to up to 3 | The Department of Health and Family Services and the Department of Agriculture and Consumer Protection agree that Special Organizations Serving Meals is a licensing issue, and will move chapter 11 and the definition from the Appendix to HFS 196. Since more and more churches and other special organizations are preparing meals for the general public, this provision remains important for allowing these types of food establishments to prepare |

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| | <p>days in a twelve month period (pot lucks, funeral dinners, business meeting dinners, religious service meals are all exempt.). These operators pay for a full service permit when they perform food service to the public more than three days. Since the Food Code is performance based with many flexible provisions with many “as approved by the Regulatory Authority”, this chapter is unneeded. There is no provision for this definition or exemption in Chapter 254, subchapter VII, Stats. The exemption to the WI Food Manager Certification would be eliminated if this chapter is eliminated. The WI Food Code, in its entirety, would apply to these operators, once licensing is required. This would require that the 21 churches, religious, fraternal, civic organizations employ individuals with state certifications in food safety. The same groups would be required to employ a WI Certified Food Manager for 13 days of the year. By removal of this chapter, “Person in charge” responsibilities of WFC Chapter 2-103.11 are not diminished. [15]</p> | <p>and serve food.</p> |
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