

▶ SPOTLIGHT ON SUCCESS STORIES FROM THE FIELD



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Active Managerial Control: Implementation and Insights

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Editor’s Note: The National Environmental Health Association (NEHA) strives to provide relevant and useful information through the pages of the *Journal* for environmental health professionals. In a recent membership survey, we heard your request for information that spotlights successful environmental health programs across the different areas of environmental health and from different sectors of the profession. We listened and are pleased to introduce a new column that shines a spotlight on success stories from the environmental health field. These stories enable us to learn from our peers and provide an avenue to incorporate successful programs, innovative solutions, and unique approaches to our own programs and initiatives.

The conclusions of this column are those of the author(s) and do not necessarily represent the views or official position of NEHA, our funders, or our partners.

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Across the U.S., environmental health agencies are navigating mounting workloads and competing priorities. As part of the trend across public health fields, many environmental health agencies are understaffed and forced to either cut back on services or devise increasingly creative programs to address community needs

(Leider et al., 2023). For food safety departments, active managerial control (AMC) programs are a practical and proactive approach to support widespread food safety practices with limited staff and resources. AMC is the “purposeful incorporation of specific actions or procedures by industry management to attain control over foodborne illness risk fac-

tors” (Food and Drug Administration [FDA], 2023a). AMC programs facilitate better food safety outcomes by providing the necessary information and tools for food establishment operators to achieve AMC.

In 2022, Environmental Health Services within the Washoe County Health District (WCHD) in Northern Nevada received a 3-year National Environmental Health Association (NEHA)–Food and Drug Administration (FDA) Retail Flexible Funding Model grant to fund the implementation of an AMC program. The success achieved by the WCHD Food Safety and Consumer Protection Program during the first year of the grant period encompassed gathering information and building the crucial components of an AMC program. WCHD will begin offering the AMC program starting in July 2023. Implementation of AMC programs can vary among jurisdiction; however, sharing the experiences of WCHD might help guide other jurisdictions through the process.

In spring 2022, members of the WCHD Food Safety and Consumer Protection Program visited the Maricopa County Environmental Services Department (MCESD) to learn from their experience implementing an AMC program. The broad success of the AMC program offered by MCESD contributed to the department receiving the 2018 Samuel J. Crumbine Consumer Protection Award for Excellence in Food Protection (Shapiro, 2018). WCHD staff were able to attend an AMC class, share and review guidance documents and standard operating procedures, and ask questions on lessons learned



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by MCESD to inform a clear and compelling vision for its own program to be instituted in Washoe County.

Results of a self-assessment conducted in 2021 for the Voluntary National Retail Food Regulatory Program Standards (FDA, 2023b) determined that WCHD does not possess adequate resources to enact its proposed compliance strategy of providing on-site food safety training to operators outside of the corrective actions required during routine inspections. Akin to many jurisdictions nationwide, the food safety enforcement policy at WCHD embodied the historically reactive nature of food safety regulation. Washoe County food establishments with multiple and/or repeat critical violations observed during routine inspections are subject to reinspection. If additional reinspections are warranted, each is associated with a fee to be paid by the food establishment operator. Despite sporadic success in reducing observed violations, the inspection and reinspection enforcement cycles introduce a wide margin of opportunity for foodborne illnesses to occur due to underemphasizing the development of preventive food safety policies and long-term compliance with regulations (FDA, 2023a). Identifying the simultaneous need for a more efficient use of agency resources and proactive approaches to achieving compliance guided WCHD's development of AMC program components that ensure success.

Modeled after MCESD, the AMC program for WCHD (2023) is comprised of a

training course and online toolbox geared toward establishment managers or those individuals with the ability to enact change in a facility. When used in conjunction, the AMC training course and toolbox provide instruction and resources for creating meaningful food safety management systems—called AMC policies—that lead to sustained AMC. In an analysis conducted by FDA (2018), food establishments with well-developed food safety management systems were associated with fewer risk factor violations than those establishments with underdeveloped food safety management systems. Well-developed and effective food safety management systems generally consist of detailed food safety procedures, along with consistent training and monitoring practices (Brown, 2021).

The AMC program training course instructs establishment operators on use of the procedures, training, and monitoring structure to create AMC policies that are specific to their facilities. AMC toolbox materials and worksheets—including an editable policy template and sample policy language—guide operators through the procedures, training, and monitoring structure, further empowering operator confidence in developing AMC policies. As a whole, the AMC program is designed to support AMC policies developed by managers that are informed by input from staff stakeholders, specific to operations of the facility, and adaptable to change as necessary (Maricopa County Environmental

Services Department, n.d.). Through facilitating policy development, AMC programs support operators in taking responsibility for long-term AMC and creating a culture of food safety at their establishments.

By empowering operators to attain AMC, the AMC program is structured to interrupt a reactive enforcement cycle through program enrollment as an alternative to paying reinspection fees and as an extension of time to implement new policies before the facility's next inspection. Overall, MCESD reported a 41% decrease in enforcement actions taken following the institution of their AMC program. This result indicates preventative actions as not only a more successful compliance strategy but also a more efficient use of department resources (Shapiro, 2018). The county resources saved by reducing the number of reinspections per establishment can be allocated to a risk-based frequency of routine inspections, which are more comprehensive and more efficient in responding to violations (Leinwand et al., 2017).

Aside from the proactive protection of public health and improved efficiency of environmental health agency resources, AMC program implementation can have significant collateral benefits for communities and business owners, which are important when considering public support of the program. WCHD inspects approximately 3,500 food establishments annually, a number that continues to increase alongside the thriving food culture of the area. AMC program implementation supports the unique qualities of the community, such as local business ownership and diverse food offerings. Incorporation of the AMC program in enforcement policy provides a more financially accessible and feasible solution for operators of nonchain establishments who are typically not supported by the same internal food safety protocols and economies of scale associated with chain establishments (Leinwand et al., 2017).

By offering AMC program training courses and toolbox materials in languages other than English, AMC policies can encompass cultural food practices that might not be otherwise captured and can improve public health equity across jurisdictional demographics. Like most of the country, food establishments in Washoe County have felt the financial pressure of rising food costs.

Food waste data indicate that, when combined, the food service and food retail sectors accounted for 60% of food waste generated by the U.S. in 2019, amounting to a massive financial burden for business owners within these sectors (U.S. Environmental Protection Agency, 2023). Successful AMC policies can reduce food waste through proper food storage, prevention of contamination, and proper food handling—practices that are beneficial to consumers and businesses.

Implementing a new regulatory program can be a daunting task when confronted with limited staff and agency resources. In the first year of AMC program implementation, WCHD's experience has been greatly aided by sharing information with other jurisdictions regarding established programs, matching possible program outcomes with agency needs, and embracing the unique qualities of the community. It is the intention of WCHD that these insights spur confident first steps for jurisdictions that are starting to implement AMC programs. ✨

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Do you have a success story to share with our readership? We are looking for stories that highlight successes across all areas of environmental health—from air quality to zoonoses—that represent the different sectors of our profession. If interested, please contact Kristen Ruby-Cisneros at kruby@neha.org for column guidelines.

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