# OCHD Food Service Industry Forum

## July 15, 2025

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OAKLAND COUNTY MICHIGAN
HEALTH DIVISION
DAVID COULTER
OAKLAND COUNTY EXECUTIVE

# Agenda

- Place your name and organization in the chat

- Welcome!
- OCHD Updates
- Time Temperature Control for Safety Foods and Specialized Processing
- Open Discussion and Resource Sharing
- Follow-up Survey

# Updates

- Licensing Renewals

Accela Citizen Access

# Updates

- Paid STFU Inspections

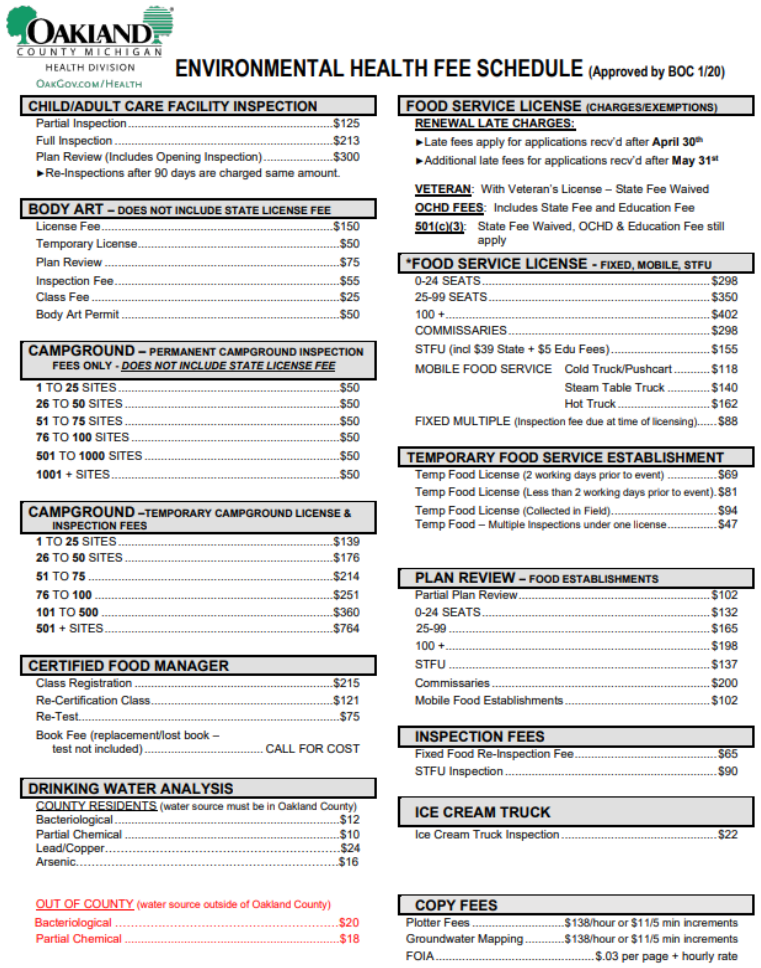
- Inspections completed by Oakland County must be at least 1 month apart
  - Example: First inspection completed by OCHD on August 15, second inspection cannot be completed by OCHD before September 15

# Updates

- Fee Increases

## Resources

- Environmental Health Services List
- 2024 Environmental Health Fee Schedule
- Oakland County Sanitary Code Article III (Approved August 2016)



OAKLAND COUNTY MICHIGAN
HEALTH DIVISION
OAKGOV.COM/HEALTH

**ENVIRONMENTAL HEALTH FEE SCHEDULE** (Approved by BOC 1/20)

**CHILD/ADULT CARE FACILITY INSPECTION**
- Partial Inspection ..... $125
- Full Inspection ..... $213
- Plan Review (Includes Opening Inspection) ..... $300
- ►Re-Inspections after 90 days are charged same amount.

**BODY ART – DOES NOT INCLUDE STATE LICENSE FEE**
- License Fee ..... $150
- Temporary License ..... $50
- Plan Review ..... $75
- Inspection Fee ..... $55
- Class Fee ..... $25
- Body Art Permit ..... $50

**CAMPGROUND – PERMANENT CAMPGROUND INSPECTION FEES ONLY - *DOES NOT INCLUDE STATE LICENSE FEE***
- 1 TO 25 SITES ..... $50
- 26 TO 50 SITES ..... $50
- 51 TO 75 SITES ..... $50
- 76 TO 100 SITES ..... $50
- 501 TO 1000 SITES ..... $50
- 1001 + SITES ..... $50

**CAMPGROUND –TEMPORARY CAMPGROUND LICENSE & INSPECTION FEES**
- 1 TO 25 SITES ..... $139
- 26 TO 50 SITES ..... $176
- 51 TO 75 ..... $214
- 76 TO 100 ..... $251
- 101 TO 500 ..... $360
- 501 + SITES ..... $764

**CERTIFIED FOOD MANAGER**
- Class Registration ..... $215
- Re-Certification Class ..... $121
- Re-Test ..... $75
- Book Fee (replacement/lost book – test not included) ..... CALL FOR COST

**DRINKING WATER ANALYSIS**

COUNTY RESIDENTS (water source must be in Oakland County)
- Bacteriological ..... $12
- Partial Chemical ..... $10
- Lead/Copper ..... $24
- Arsenic ..... $16

OUT OF COUNTY (water source outside of Oakland County)
- Bacteriological ..... $20
- Partial Chemical ..... $18

**FOOD SERVICE LICENSE (CHARGES/EXEMPTIONS)**

RENEWAL LATE CHARGES:
- ►Late fees apply for applications recv'd after **April 30th**
- ►Additional late fees for applications recv'd after **May 31st**

VETERAN: With Veteran's License – State Fee Waived
OCHD FEES: Includes State Fee and Education Fee
501(c)(3): State Fee Waived, OCHD & Education Fee still apply

***FOOD SERVICE LICENSE - FIXED, MOBILE, STFU**
- 0-24 SEATS ..... $298
- 25-99 SEATS ..... $350
- 100 + ..... $402
- COMMISSARIES ..... $298
- STFU (incl $39 State + $5 Edu Fees) ..... $155
- MOBILE FOOD SERVICE Cold Truck/Pushcart ..... $118
  Steam Table Truck ..... $140
  Hot Truck ..... $162
- FIXED MULTIPLE (Inspection fee due at time of licensing) ..... $88

**TEMPORARY FOOD SERVICE ESTABLISHMENT**
- Temp Food License (2 working days prior to event) ..... $69
- Temp Food License (Less than 2 working days prior to event) ..... $81
- Temp Food License (Collected in Field) ..... $94
- Temp Food – Multiple Inspections under one license ..... $47

**PLAN REVIEW – FOOD ESTABLISHMENTS**
- Partial Plan Review ..... $102
- 0-24 SEATS ..... $132
- 25-99 ..... $165
- 100 + ..... $198
- STFU ..... $137
- Commissaries ..... $200
- Mobile Food Establishments ..... $102

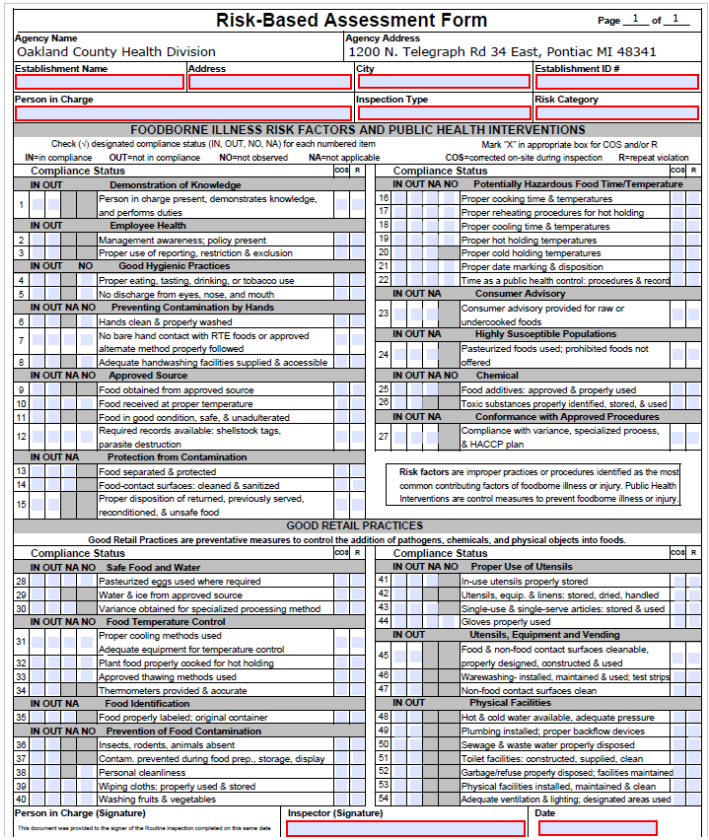
**INSPECTION FEES**
- Fixed Food Re-Inspection Fee ..... $65
- STFU Inspection ..... $90

**ICE CREAM TRUCK**
- Ice Cream Truck Inspection ..... $22

**COPY FEES**
- Plotter Fees ..... $138/hour or $11/5 min increments
- Groundwater Mapping ..... $138/hour or $11/5 min increments
- FOIA ..... $.03 per page + hourly rate

# Updates

- Risk Based Inspection Forms



**Risk-Based Assessment Form** Page 1 of 1

| Agency Name | Agency Address |
|---|---|
| Oakland County Health Division | 1200 N. Telegraph Rd 34 East, Pontiac MI 48341 |

| Establishment Name | Address | City | Establishment ID # |
|---|---|---|---|
| | | | |

| Person in Charge | Inspection Type | Risk Category |
|---|---|---|
| | | |

**FOODBORNE ILLNESS RISK FACTORS AND PUBLIC HEALTH INTERVENTIONS**

Check (√) designated compliance status (IN, OUT, NO, NA) for each numbered item — Mark "X" in appropriate box for COS and/or R

IN=in compliance OUT=not in compliance NO=not observed NA=not applicable COS=corrected on-site during inspection R=repeat violation

| Compliance Status | | | | | | COS | R |
|---|---|---|---|---|---|---|---|
| **IN OUT** | | | | | **Demonstration of Knowledge** | | |
| 1 | | | | | Person in charge present, demonstrates knowledge, and performs duties | | |
| **IN OUT** | | | | | **Employee Health** | | |
| 2 | | | | | Management awareness; policy present | | |
| 3 | | | | | Proper use of reporting, restriction & exclusion | | |
| **IN OUT** | | | | **NO** | **Good Hygienic Practices** | | |
| 4 | | | | | Proper eating, tasting, drinking, or tobacco use | | |
| 5 | | | | | No discharge from eyes, nose, and mouth | | |
| **IN OUT** | | | **NA** | **NO** | **Preventing Contamination by Hands** | | |
| 6 | | | | | Hands clean & properly washed | | |
| 7 | | | | | No bare hand contact with RTE foods or approved alternate method properly followed | | |
| 8 | | | | | Adequate handwashing facilities supplied & accessible | | |
| **IN OUT** | | | **NA** | **NO** | **Approved Source** | | |
| 9 | | | | | Food obtained from approved source | | |
| 10 | | | | | Food received at proper temperature | | |
| 11 | | | | | Food in good condition, safe, & unadulterated | | |
| 12 | | | | | Required records available: shellstock tags, parasite destruction | | |
| **IN OUT** | | | **NA** | | **Protection from Contamination** | | |
| 13 | | | | | Food separated & protected | | |
| 14 | | | | | Food-contact surfaces: cleaned & sanitized | | |
| 15 | | | | | Proper disposition of returned, previously served, reconditioned, & unsafe food | | |

| Compliance Status | | | | | | COS | R |
|---|---|---|---|---|---|---|---|
| **IN OUT** | | | **NA** | **NO** | **Potentially Hazardous Food Time/Temperature** | | |
| 16 | | | | | Proper cooking time & temperatures | | |
| 17 | | | | | Proper reheating procedures for hot holding | | |
| 18 | | | | | Proper cooling time & temperatures | | |
| 19 | | | | | Proper hot holding temperatures | | |
| 20 | | | | | Proper cold holding temperatures | | |
| 21 | | | | | Proper date marking & disposition | | |
| 22 | | | | | Time as a public health control: procedures & record | | |
| **IN OUT** | | | **NA** | | **Consumer Advisory** | | |
| 23 | | | | | Consumer advisory provided for raw or undercooked foods | | |
| **IN OUT** | | | **NA** | | **Highly Susceptible Populations** | | |
| 24 | | | | | Pasteurized foods used; prohibited foods not offered | | |
| **IN OUT** | | | **NA** | **NO** | **Chemical** | | |
| 25 | | | | | Food additives: approved & properly used | | |
| 26 | | | | | Toxic substances properly identified, stored, & used | | |
| **IN OUT** | | | **NA** | | **Conformance with Approved Procedures** | | |
| 27 | | | | | Compliance with variance, specialized process, & HACCP plan | | |

**Risk factors** are improper practices or procedures identified as the most common contributing factors of foodborne illness or injury. Public Health Interventions are control measures to prevent foodborne illness or injury.

**GOOD RETAIL PRACTICES**

Good Retail Practices are preventative measures to control the addition of pathogens, chemicals, and physical objects into foods.

| Compliance Status | | | | | | COS | R |
|---|---|---|---|---|---|---|---|
| **IN OUT** | | | **NA** | **NO** | **Safe Food and Water** | | |
| 28 | | | | | Pasteurized eggs used where required | | |
| 29 | | | | | Water & ice from approved source | | |
| 30 | | | | | Variance obtained for specialized processing method | | |
| **IN OUT** | | | **NA** | **NO** | **Food Temperature Control** | | |
| 31 | | | | | Proper cooling methods used<br>Adequate equipment for temperature control | | |
| 32 | | | | | Plant food properly cooked for hot holding | | |
| 33 | | | | | Approved thawing methods used | | |
| 34 | | | | | Thermometers provided & accurate | | |
| **IN OUT** | | | **NA** | | **Food Identification** | | |
| 35 | | | | | Food properly labeled; original container | | |
| **IN OUT** | | | **NA** | **NO** | **Prevention of Food Contamination** | | |
| 36 | | | | | Insects, rodents, animals absent | | |
| 37 | | | | | Contam. prevented during food prep., storage, display | | |
| 38 | | | | | Personal cleanliness | | |
| 39 | | | | | Wiping cloths: properly used & stored | | |
| 40 | | | | | Washing fruits & vegetables | | |

| Compliance Status | | | | | | COS | R |
|---|---|---|---|---|---|---|---|
| **IN OUT** | | | **NA** | **NO** | **Proper Use of Utensils** | | |
| 41 | | | | | In-use utensils properly stored | | |
| 42 | | | | | Utensils, equip. & linens: stored, dried, handled | | |
| 43 | | | | | Single-use & single-serve articles: stored & used | | |
| 44 | | | | | Gloves properly used | | |
| **IN OUT** | | | | | **Utensils, Equipment and Vending** | | |
| 45 | | | | | Food & non-food contact surfaces cleanable, properly designed, constructed & used | | |
| 46 | | | | | Warewashing- installed, maintained & used; test strips | | |
| 47 | | | | | Non-food contact surfaces clean | | |
| **IN OUT** | | | | | **Physical Facilities** | | |
| 48 | | | | | Hot & cold water available, adequate pressure | | |
| 49 | | | | | Plumbing installed; proper backflow devices | | |
| 50 | | | | | Sewage & waste water properly disposed | | |
| 51 | | | | | Toilet facilities: constructed, supplied, clean | | |
| 52 | | | | | Garbage/refuse properly disposed; facilities maintained | | |
| 53 | | | | | Physical facilities installed, maintained & clean | | |
| 54 | | | | | Adequate ventilation & lighting; designated areas used | | |

| Person in Charge (Signature) | Inspector (Signature) | Date |
|---|---|---|
| This document was provided to the signer of the Routine Inspection completed on this same date. | | |

# Spanish ServSafe

- OCHD will be offering the ServSafe Certified Manager training in Spanish in March and October of 2025.

# Updates

- Questions?

# Understanding TCS Foods and Variance Procedures in Food Safety

Amanda Anderson, MSA, REHS, CP-FS
Public Health Sanitarian Supervisor

OAKLAND COUNTY MICHIGAN
HEALTH DIVISION
DAVID COULTER
OAKLAND COUNTY EXECUTIVE

# Welcome

Amanda Anderson, MSA, REHS, CP-FS

Public Health Sanitarian Supervisor

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248-431-1003

Purpose of Presentation:

- To provide clarity on food safety concepts that affect public health
- Help industry and regulators understand when a variance and/or HACCP plan is required

Why it Matters:

- Prevent foodborne illness
- Supports compliance with regulations

# Agenda

- Core Concepts: TCS Foods & Dehydrated Foods
- 2009 Michigan Modified Food Code: Tables A &B
- HACCP Plans Overview
- Specialized Processing & Variance Requests
- HACCP Review and Field Verification
- Questions

# TCS Foods

- TCS Foods
  - TCS food, or Time/Temperature Control for Safety food, refers to food items that require specific time and temperature controls to limit the growth of harmful bacteria and prevent foodborne illnesses.

The *2009 Michigan Modified Food Code* states the following:

- TCS foods includes the following:
  - An **animal food** that is raw or heat treated
  - A **plant food** that is heat treated or consists of:
    - Raw seed sprouts, cut melons, cut leafy greens, cut tomatoes or mixtures of cut tomatoes that are not modified in a way so they are unable to support pathogenic microorganism growth or toxin formation
  - **Garlic-in-oil mixtures** that are not modified in a way so they are unable to support pathogenic microorganism growth or toxin formation

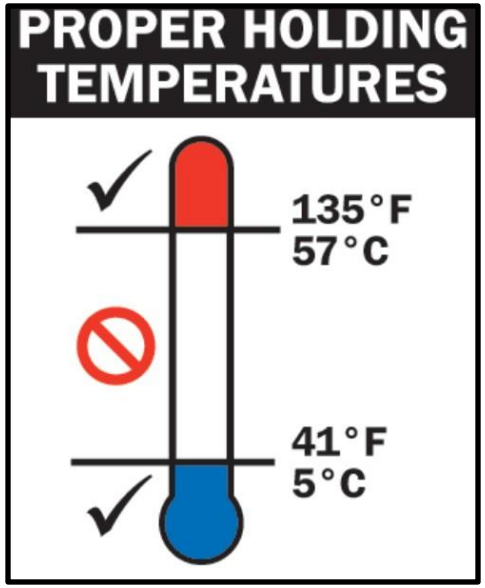
# TCS Foods

- TCS Foods
  - TCS foods are considered high-risk because they provide an ideal environment for the rapid growth of harmful bacteria, potentially leading to foodborne illnesses if not handled and stored correctly.
  - These foods are susceptible to contamination due to their high moisture content, protein levels, and neutral acidity, which allow pathogens to multiply quickly.

# TCS Foods

To ensure the safety to TCS foods, maintain them at safe temperatures, either hot or cold, and minimize the time they spend in the temperature danger zone (41°F to 135°F).

– This means holding hot TCS foods at 135°F or above and cold TCS foods at 41°F or below.




**Temperature danger zone:**

Avoid holding TCS foods in the temperature danger zone for more than 4 hours. If TCS food is held in this zone for longer, it shall be discarded.

– Within this range, bacteria can multiply rapidly, potentially causing foodborne illnesses.

# Dehydrated Foods

- Dehydrated Foods
  - Dehydration is one of the oldest forms of food preservation methods.
  - It is used for multiple types of foods (proteins, fruits, vegetables) and using different methods.
  - Biological hazards can persist and grow if the process is not done properly.

# Dehydrated Foods

- Dehydration removes moisture from a food so bacteria, yeast, molds and other organisms cannot grow.
- In plant food, dehydration slows down the action of the enzymes which cause plant food to ripen but does not inactivate them.

# Dehydrated Foods

- Question:

If the moisture content is reduced during dehydration, does that mean that the dehydrated food is no longer considered TCS?

# Dehydrated Foods

- Answer:

It depends! Dehydration can result in a shelf-stable food or a food that still requires temperature control.

The TCS status of a dehydrated food must be validated and not assumed.

# 2009 Michigan Modified Food Code: Table A & Table B

When is a food NOT considered TCS?

Introducing Interaction Tables A & B from the *2009 Michigan Modified Food Code*:

**Table A. Interaction of pH and $A_w$ for control of spores in FOOD heat-treated to destroy vegetative cells and subsequently PACKAGED**

| $A_w$ values | pH values | | |
|---|---|---|---|
| | 4.6 or less | > 4.6 - 5.6 | > 5.6 |
| ≤0.92 | non-PHF*/non-TCS FOOD** | non-PHF/non-TCS FOOD | non-PHF/non-TCS FOOD |
| > 0.92 - .95 | non-PHF/non-TCS FOOD | non-PHF/non-TCS FOOD | PA*** |
| > 0.95 | non-PHF/non-TCS FOOD | PA | PA |

* PHF means POTENTIALLY HAZARDOUS FOOD
** TCS FOOD means TIME/TEMPERATURE CONTROL FOR SAFETY FOOD
*** PA means Product Assessment required

**Table B. Interaction of pH and $A_w$ for control of vegetative cells and spores in FOOD not heat-treated or heat-treated but not PACKAGED**

| $A_w$ values | pH values | | | |
|---|---|---|---|---|
| | < 4.2 | 4.2 - 4.6 | > 4.6 - 5.0 | > 5.0 |
| < 0.88 | non-PHF*/ non-TCS food** | non-PHF/ non-TCS food | non-PHF/ non-TCS food | non-PHF/ non-TCS food |
| 0.88 – 0.90 | non-PHF/ non-TCS food | non-PHF/ non-TCS food | non-PHF/ non-TCS food | PA*** |
| > 0.90 – 0.92 | non-PHF/ non-TCS food | non-PHF/ non-TCS food | PA | PA |
| > 0.92 | non-PHF/ non-TCS food | PA | PA | PA |

* PHF means POTENTIALLY HAZARDOUS FOOD
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# 2009 Michigan Modified Food Code: Table A & Table B

Table A depicts an interaction of pH and water activity ($A_w$) for control of spores in food that has been **heat treated** to destroy vegetative cells and **subsequently packaged**.

**Table A. Interaction of pH and $A_w$ for control of spores in FOOD heat-treated to destroy vegetative cells and subsequently PACKAGED**

| $A_w$ values | pH values | | |
|---|---|---|---|
| | 4.6 or less | > 4.6 - 5.6 | > 5.6 |
| ≤0.92 | non-PHF*/non-TCS FOOD** | non-PHF/non-TCS FOOD | non-PHF/non-TCS FOOD |
| > 0.92 - .95 | non-PHF/non-TCS FOOD | non-PHF/non-TCS FOOD | PA*** |
| > 0.95 | non-PHF/non-TCS FOOD | PA | PA |

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# 2009 Michigan Modified Food Code: Table A & Table B

Table B depicts an interaction of pH and $A_w$ for control of vegetative cells and spores in food not heat-treated OR food **heat-treated but NOT packaged**.

**Table B. Interaction of pH and $A_w$ for control of vegetative cells and spores in FOOD not heat-treated or heat-treated but not PACKAGED**

| $A_w$ values | pH values | | | |
|---|---|---|---|---|
| | < 4.2 | 4.2 - 4.6 | > 4.6 - 5.0 | > 5.0 |
| < 0.88 | non-PHF*/ non-TCS food** | non-PHF/ non-TCS food | non-PHF/ non-TCS food | non-PHF/ non-TCS food |
| 0.88 – 0.90 | non-PHF/ non-TCS food | non-PHF/ non-TCS food | non-PHF/ non-TCS food | PA*** |
| > 0.90 – 0.92 | non-PHF/ non-TCS food | non-PHF/ non-TCS food | PA | PA |
| > 0.92 | non-PHF/ non-TCS food | PA | PA | PA |

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** TCS FOOD means TIME/TEMPERATURE CONTROL FOR SAFETY FOOD
*** PA means Product Assessment required

# 2009 Michigan Modified Food Code: Table A & Table B

Is this Food TCS or Not?

Dehydrated apple slices that are placed on a sheet tray.

**pH 3.9 $A_w$ 0.65**

Which Interaction Table should be used?

B – The food product is heat-treated but not packaged.

Should this food be considered a non-TCS food or is a PA required?

# 2009 Michigan Modified Food Code: Table A & Table B

## Table B – Dehydrated Apples

Interaction of pH and $A_w$ for control of vegetative cells and spores in food not heat-treated OR food **heat-treated but NOT packaged**

**pH 3.9**

**$A_w$ 0.65**

**Table B. Interaction of pH and $A_w$ for control of vegetative cells and spores in FOOD not heat-treated or heat-treated but not PACKAGED**

| $A_w$ values | pH values | | | |
|---|---|---|---|---|
| | < 4.2 | 4.2 - 4.6 | > 4.6 - 5.0 | > 5.0 |
| < 0.88 | non-PHF*/ non-TCS food** | non-PHF/ non-TCS food | non-PHF/ non-TCS food | non-PHF/ non-TCS food |
| 0.88 – 0.90 | non-PHF/ non-TCS food | non-PHF/ non-TCS food | non-PHF/ non-TCS food | PA*** |
| > 0.90 – 0.92 | non-PHF/ non-TCS food | non-PHF/ non-TCS food | PA | PA |
| > 0.92 | non-PHF/ non-TCS food | PA | PA | PA |

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# 2009 Michigan Modified Food Code: Table A & Table B

Is this Food TCS or Not?

Cook-Chill nacho cheese sauce

**pH 5.7 $A_w$ 0.95**

Which Interaction Table should be used?

A – The food product is heat-treated and subsequently packaged.

Should this food be considered a non-TCS food or is a PA required?

# 2009 Michigan Modified Food Code: Table A & Table B

## Table A – Cook-Chill Nacho Cheese Sauce

Interaction of pH and $A_w$ for control of spores in food **heat-treated** to destroy vegetative cells and **subsequently packaged**

**pH 5.7**

**$A_w$ 0.95**

**Table A. Interaction of pH and $A_w$ for control of spores in FOOD heat-treated to destroy vegetative cells and subsequently PACKAGED**

| $A_w$ values | pH values | | |
|---|---|---|---|
| | 4.6 or less | > 4.6 - 5.6 | > 5.6 |
| ≤0.92 | non-PHF*/non-TCS FOOD** | non-PHF/non-TCS FOOD | non-PHF/non-TCS FOOD |
| > 0.92 - .95 | non-PHF/non-TCS FOOD | non-PHF/non-TCS FOOD | PA*** |
| > 0.95 | non-PHF/non-TCS FOOD | PA | PA |

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# 2009 Michigan Modified Food Code: Table A & Table B

The Food Code requires food service establishments to submit a variance request to the regulatory authority with the evidence that the food does not require time/temperature control for safety.

An inspector does not need to verify the pH and water activity of every retail food. The intent of the Interaction Tables is to use them as tools when a food is handled differently from what was done in the past or to validate results in a challenge study.

# HACCP

## What is HACCP?

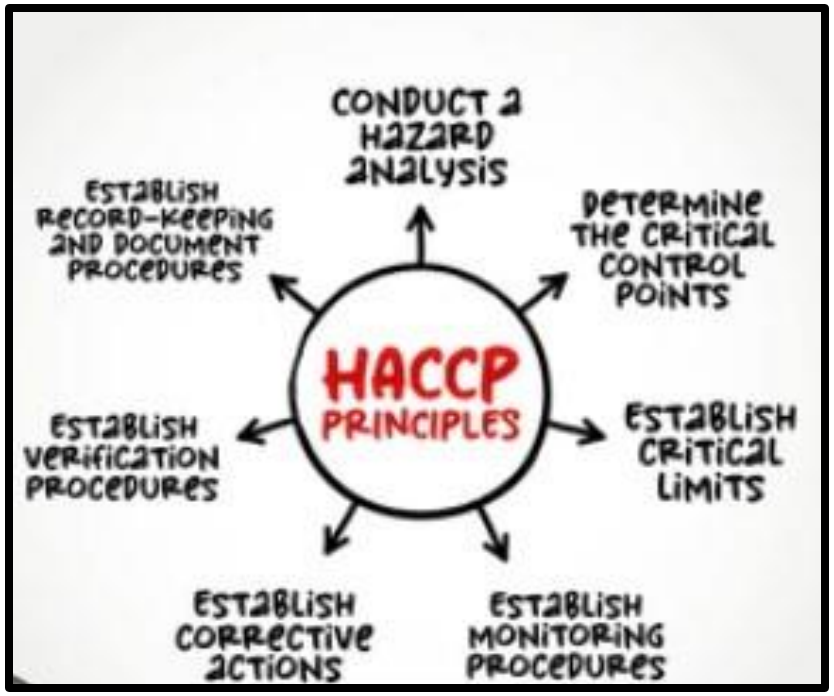
- HACCP stands for Hazard Analysis and Critical Control Point.
- It is a systematic approach to identifying, evaluating, and controlling food safety hazards.
- Food safety hazards include:
  - Biological hazards (e.g., bacteria, viruses)
  - Chemical hazards (e.g., cleaning agents, pesticides)
  - Physical hazards (e.g., glass, metal fragments)
- HACCP is designed to prevent hazards that could cause illness or injury if not properly controlled.
- The goal: Reduce or eliminate risks during food production.

# HACCP Plans Overview

- HACCP plans are written documents based on established principles.
- They outline procedures for reducing food safety risks to acceptable levels.
- Plans are built around seven core principles of HACCP.
- HACCP plans ensure a structured, consistent method to control hazards in any food process.

# The Seven Principles of HACCP

To ensure a structured and effective food safety system, HACCP is built on seven core principles that guide the development and implementation of every HACCP plan.



# The Seven Principles of HACCP

1) **Conduct a Hazard Analysis**
   - Identify potential biological, chemical, or physical hazards.
2) **Determine Critical Control Points (CCPs)**
   - Determine points in the process where hazards can be controlled or eliminated.
3) **Establish Critical Limits**
   - Define maximum or minimum values (e.g., temperature, pH) for each CCP.
4) **Establish Monitoring Procedures**
   - Plan how to monitor CCPs to ensure critical limits are met.
5) **Establish Corrective Actions**
   - Define steps to take when a critical limit is not met.
6) **Establish Verification Procedures**
   - Confirm the system is working effectively.
7) **Establish Recordkeeping and Documentation Procedures**
   - Maintain records to show the HACCP plan is being followed.

# When is HACCP Required?

Section 8-201.13 of the *2009 Michigan Modified Food Code* outlines when a HACCP plan is required:

1) Required by law;
2) A Variance is needed under:
   - 3-401.11(D)(4) (cooking raw animal foods)
   - 3-502.11 (specialized processing methods)
   - 4-204.110(B) (molluscan shellfish life-support system tanks)

3) The regulatory authority requires it based on plan review, inspectional findings, or a submitted variance request.

4) When a facility packages TCS food using a reduced oxygen packaging method under section 3-502.12.

# Specialized Processing & Variances

## What is specialized food processing?

- Specialized food processing refers to methods of food preparation that involve increased risks of foodborne illness and require specific food safety controls beyond those assessed in the *Food Code*.
- These processes are used to preserve food, extend shelf life, or make food shelf-stable.

# Specialized Processing & Variances

*2009 Michigan Modified Food Code* Special Processes at Retail Include:

- Smoking food to preserve, not just flavor
- Curing meats or other foods
- Using additives (e.g., vinegar) for preservation or to make food non-TCS
- Reduced oxygen packaging (e.g., vacuum sealing)
- Shellfish display tanks with life-support systems
- Custom processing animals for personal use
- Sprouting seeds or beans
- Preparing food by another method that is determined by the regulatory authority to require a variance

# Specialized Processing & Variances

- Many of the special processes include food preparation techniques that are not addressed by the *Food Code*.
- Because of the hazards associated with special processes, food service establishments must apply for a variance, often supported by a HACCP plan, and documentation showing the process can be done safely.

# What Is a Variance?

A variance is a written document issued by the regulatory authority that authorizes a modification or waiver to one or more requirements of the *Food Code* if, in the opinion of the regulatory authority, a health hazard or nuisance will not result from the modification or waiver.

# When is a Variance Required?

Under Section 3-502.11 of the *2009 Michigan Modified Food Code*, a variance is required before conducting any specialized food processing methods.

# Variance and HACCP Plan?

Question: When is a variance AND a HACCP plan required by the regulatory authority?

Answer:

**IT DEPENDS!**

# Variance and HACCP Plan?

OAKLAND COUNTY MICHIGAN
HEALTH DIVISION

**SPECIALIZED PROCESSING REFERENCE SHEET**

| Food Preparation Process | Specialized Processing Variance Required | HACCP Required | HACCP Needs Pre-Approval* | Reference Code Number | HACCP Plan Field Verification Checklist |
|---|---|---|---|---|---|
| Reduced Oxygen Packaging† Non-TCS Foods | NO | NO | NO | N/A | N/A |
| Reduced Oxygen Packaging<br>--Any other method not outlined below | YES | YES | YES | 3-502.11 | Reduced Oxygen Packaging |
| **Reduced Oxygen Packaging TCS Foods**<br>(held ≤ 41°F for ≤ 14 days) | | | | | |
| $A_w$ of 0.91 or less | NO | YES | NO | 3-502.12 | Reduced Oxygen Packaging |
| pH of 4.6 or less | NO | YES | NO | 3-502.12 | Reduced Oxygen Packaging |
| USDA regulated cured meats | NO | YES | NO | 3-502.12 | Reduced Oxygen Packaging |
| Raw meats | NO | YES | NO | 3-502.12 | Reduced Oxygen Packaging |
| Raw vegetables | NO | YES | NO | 3-502.12 | Reduced Oxygen Packaging |
| **Reduced Oxygen Packaging TCS Foods** (see Food Code for temperatures, hold times and additional requirements) | | | | | |
| Cook/Chill | NO | YES | NO | 3-502.12 | Reduced Oxygen Packaging |
| Sous Vide | NO | YES | NO | 3-502.12 | Reduced Oxygen Packaging |
| Fish (frozen before, during, and after packaging) | NO | YES | NO | 3-502.12 | Reduced Oxygen Packaging |
| Cheeses (commercially manufactured, no additional ingredients, classified as hard cheeses, pasteurized process cheese, or semi-soft cheeses) | NO | YES | NO | 3-502.12 | Reduced Oxygen Packaging |

* Even if HACCP plan does not require pre-approval, still send to HACCP Review Team for review.

† Reduced Oxygen Packaging includes vacuum packaging, modified atmospheric packaging, controlled atmosphere packaging, cook chill packaging or sous vide packaging.

OCHD EH FSP 10/2023

# Variance and HACCP Plan?

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|---|---|---|---|---|---|
| Curing, Drying, Smoking of Fish as a method of Preservation | YES | YES | YES | 3-502.11 | Curing, Drying, and Smoking Fish |
| Curing, Smoking of Meat/Poultry as a Method of Preservation | YES | YES | YES | 3-502.11 | Curing and Smoking of Meat and Poultry |
| Fermentation of Sausage | YES | YES | YES | 3-502.11 | Fermentation of Sausages |
| Drying of Meat/Poultry | YES | YES | YES | 3-502.11 | Jerky |
| Using Food Additives to Extend Shelf-Life or to Render Food Non-TCS (may include acidification, fermentation, dehydration) | YES | YES | YES | 3-502.11 | Adding Components of Food Additives |
| Operating Live Molluscan Shellfish Storage Display Tanks | YES | YES | YES | 3-502.11 | Operating Molluscan Life Support System Display Tanks at Retail |
| Custom Processing of Animals for Personal Use | YES | YES | YES | 3-502.11 | Custom Processing of Meat for Personal Use |
| Any Food Preparation Method Deemed Necessary by OCHD | YES | YES | YES | 3-502.11 | Dependent on process. |
| Sprouting Seeds or Beans | YES | YES | YES | 3-502.11 | Sprouting at Retail |
| | | | | | |
| Juice Processing and Packaging | NO | YES (Warning label can be used instead) | YES | 3-404.11<br>21 CFR Part 120<br>FL 289.7106 | Packaging of Juices |

# OCHD HACCP Review Team

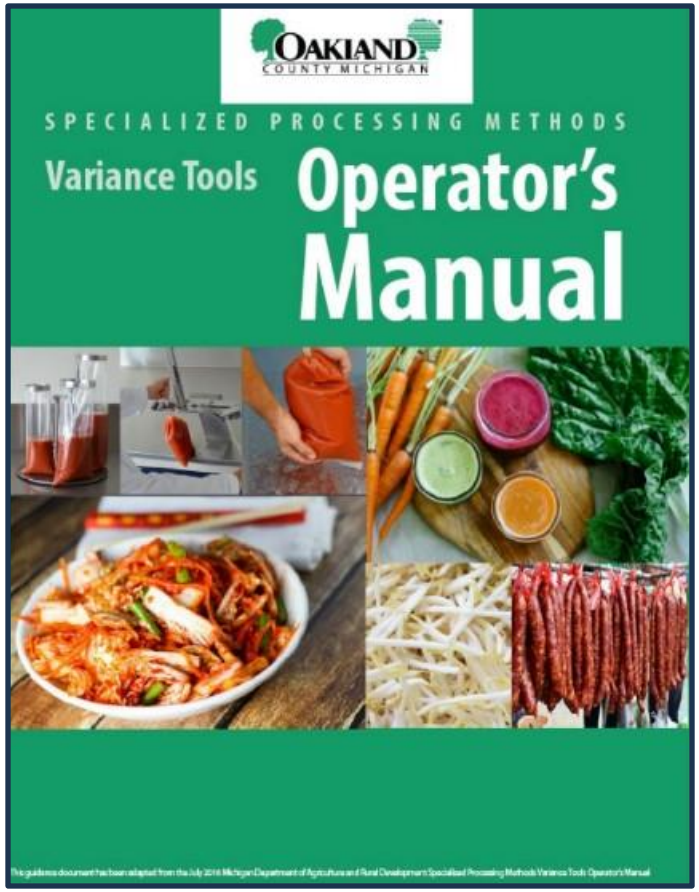
Oakland County Health Division has a HACCP Review Team within the Environmental Health Food, Shelter, and Prevention Team.

This team is tasked with addressing specialized process variance requests and HACCP plan review and/or approval.

# OCHD HACCP Review Team

If a food service establishment expresses interest in serving food processed using a specialized process, a pre-review is required by this Division.

Applicants will receive the *Specialized Processing Methods Variance Tools – Operator's Manual* from the Oakland County Health Division and will be asked to complete the proposal form included in the manual.



# OCHD HACCP Review Team

1) **Proposal Submitted** – Reviewed by HACCP Review Team to determine if a variance is needed.
2) **Variance Required?** If yes, a HACCP Plan Review is requested.
3) **HACCP Plan Reviewed** – Approved or returned for revision.
4) **If Approved** – Applicant submits a Specialized Process Variance Request Form
5) **Final Approval** – Special provisions are documented, and the applicant is notified by letter.

# HACCP Review Process &Field Verification

- Approved specialized processing methods variances are reviewed during every routine inspection.
- HACCP plans are also reviewed by environmental health field staff at each routine inspection.
- Inspectors use the HACCP Plan Field Verification Checklist to guide their review.

# HACCP Review Process &Field Verification

The review process includes:

- Evaluate processes requiring a HACCP plan
- Review the submitted HACCP plan
- Determine if the establishment is following the approved plan
- Provide corrective action guidance for any non-compliance
- Conduct a follow-up inspection, if needed, to confirm corrections

# OCHD HACCP Review Team

Contact information for the Oakland County Health Division HACCP Review Team:

OCHDHACCPReviewTeam@oakgov.com

# Q & A

Are there any questions?

Thank you!

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Environmental Health Services

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248-431-1003

# Conclusion

- Questions?

# Resource Sharing

- Anything to share or shoutout?
- Any questions or concerns?

# Follow-up Survey

Food Service Industry Forum - July 2025 Meeting

OAKLAND COUNTY MICHIGAN

HEALTH DIVISION

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DAVID COULTER
OAKLAND COUNTY EXECUTIVE

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