

Sustainable Food Safety 201



PEAK SHIFT

CHAPTER 15

Staff Food Safety Training

Teach the task. Confirm the skill.

FDA Food Code, 2-103.11(O); Annex 3

BASIS: 2026 FDA MODEL FOOD CODE



The PIC Owns the Training Duty

Assigned work

Employees need food safety training related to what they do.

Allergy awareness

Include major allergen foods and possible reaction symptoms.

Reporting

Verify health-reporting communication and teach food-defense reporting.

Follow-through

A trainer may teach; the person in charge still ensures the duties are met.

Hiring a trainer does not transfer the PIC's responsibility.

Manager Qualification Is Not Staff Training

PIC qualification

Default model rule: certified food protection manager through an accredited-program test.

Employee preparation

Duty-related training is not a requirement for every worker to pass that manager test.

Check local requirements and authority-determined minimal-risk exceptions.

2-102.12; 2-102.20; 2-103.11(O); Annex 3, 2-103.11

BASIS: FDA MODEL CODE + GUIDANCE

Start With the Employee's Actual Task

Receiving

Source, required temperature, food condition, and protected storage.

Preparation

Handwashing, ready-to-eat protection, and avoiding cross-contamination.

Cooking and holding

Food measurements, applicable limits, and response to a failed check.

Cleaning and service

Effective sanitizing, accurate ingredient information, and reporting.

Train the control the employee will actually perform.

Observe Hygiene Where It Happens

Handwashing

The PIC routinely monitors employees' handwashing.

Ready-to-eat food

Default: use suitable utensils for ready-to-eat food. Any exception must meet its specific conditions.

Training evidence

An explanation tests knowledge; an observed task tests its application.

A correct quiz answer does not show what happened at the sink.

2-103.11(D), (N)-(O); 3-301.11(B), (D)-(E)

BASIS: FDA MODEL CODE + GUIDANCE

Teach the Measurement, Not Just the Number

Cooking

Use an appropriate, properly scaled and calibrated food-temperature device.

Cooling and holding

Check food temperatures at the relevant points in the process.

PIC oversight

Daily oversight of routine temperature monitoring continues after training.

Evidence

Equipment settings or food appearance do not establish the food's temperature.

Correct limits only help when the measurement is meaningful.

Sanitizing Needs Skills and Working Supplies

Method	Clean first; use the applicable hot-water or chemical sanitizing conditions.
Chemical check	Match the test device to the sanitizer and follow the applicable label directions.
Monitoring	Check relevant concentration, pH, temperature, and contact time.
Diagnosis	Incorrect technique needs instruction; a missing or mismatched kit needs a resource correction.

Repeating training does not replace a missing test kit.

2-103.11(L), (O); 4-302.14; 4-501.114, .116; 4-703.11

BASIS: FDA MODEL CODE + GUIDANCE

Know the Nine Major Allergen Foods

Group 1

Milk; egg; fish.

Group 2

Crustacean shellfish; tree nuts; peanuts.

Group 3

Wheat; soybeans; sesame.

Apply the list

Check ingredients and prevent cross-contact; other foods can also cause allergies.

Sesame belongs on the list; peanuts and tree nuts are separate categories.

1-201.10, Major Food Allergen; 2-103.11(O); Annex 4, section 3(A)(4)

BASIS: FDA MODEL CODE + GUIDANCE

Recognize Possible Allergic Reactions

Skin and swelling

Hives, itchy rash, or swelling can occur.

Digestive symptoms

Nausea, abdominal pain, vomiting, or diarrhea can occur.

Breathing symptoms

Wheezing or shortness of breath can signal a serious reaction.

Response

Severe suspected reaction: call 911 immediately. Alert the PIC without delaying emergency medical help.

Food names alone are not a complete allergy-awareness lesson.

Connect Allergy Knowledge to Service

Identify

Use the current recipe and ingredient labels, including substitutions.

Communicate

Carry the guest's concern accurately between service and preparation staff.

Protect

Prevent allergen cross-contact through the operation's preparation and service controls.

Knowing the list does not verify a particular meal.

2-103.11(O); Annex 3, 2-103.11; Annex 4, section 3(A)(4); 4-601.11(A)

BASIS: FDA MODEL CODE + GUIDANCE

Teach Health Reporting Before It Is Needed

Who	Food employees and people with conditional offers for food-employee jobs.
What	Specified symptoms, diagnoses, and exposure or illness history.
Where	Report to the PIC with information needed to reduce transmission risk.
Distinction	Reporting is not the same decision as exclusion, restriction, or return to work.

Reporting does not wait for a confirmed diagnosis.

2-103.11(P); 2-201.11(A); 1-201.10, Conditional Employee

BASIS: FDA MODEL CODE + GUIDANCE

Make Health-Reporting Communication Verifiable

Show the content

The information covers the employee's reporting responsibilities.

Show who received it

Evidence accounts for food employees and conditional employees.

Use a suitable method

An agreement, curriculum with completion records, or another effective system may work.

Avoid false proof

A generic orientation signature does not establish what was communicated.

2026 adds a written illness policy. Scored 2022+2024 requires verifiable reporting; no single signed form.

Food Defense: Recognize and Report

Purpose

Protect food from intentional adulteration or tampering.

Employee duty

Know relevant signs and report suspicious activity to the PIC.

Job connection

Use examples from receiving, storage, preparation, and service.

Evidence threshold

Report suspicious observations; employees do not need to prove intent first.

The December 2024 Supplement adds explicit food-defense awareness and reporting.

2026 FDA model Food Code: 1-201.10, Food Defense; 2-103.11(R); Annex 3, 2-103.11

BASIS: FDA MODEL CODE + GUIDANCE

The PIC Must Understand Food-Defense Controls

Explain

Know how the operation works to prevent intentional adulteration.

Watch

Consider operations, ingredients, supplies, and finished products.

Connect

Make sure staff know which concerns reach the PIC and how.

A posted policy cannot explain how the operation's controls work.

2026 FDA model Food Code: 2-102.11(C)(18); 2-103.11(R); Annex 3, 2-103.11

BASIS: FDA MODEL CODE + GUIDANCE

Find the Gap Before Choosing Training

Knowledge gap

The employee cannot explain the relevant rule or decision.

Skill gap

The employee explains it but cannot carry out the task correctly.

Resource or process gap

Tools, supplies, access, capacity, or the work arrangement prevent correct performance.

Observe the task, ask about the decision, and check the working conditions.

Demonstrate, Practice, and Give Specific Feedback

01 Demonstrate

Show the task and explain the important decision points.

02 Practice

Let the employee perform it with the actual tools or a safe simulation.

03 Give feedback

Identify the missed step, correct it, and check the next attempt.

04 Confirm

Look for accurate performance without the trainer supplying each answer.

This is a useful training method, not a mandated FDA teaching sequence.

Choose the Method for the Learning Goal

Explain a rule

A focused lesson, discussion, or accessible online module can build knowledge.

Apply a decision

Use realistic cases, current labels, or role-play with feedback.

Perform a task

Use demonstration and observed practice with suitable tools.

Remove barriers

Check language, reading demands, technology access, and actual understanding.

The delivery format is not the learning result.

2-103.11(O); CDC Quality Training Standards 1-5, 7

BASIS: TRAINING PRACTICE

Separate Knowledge From Performance Evidence

Knowledge evidence

The employee explains a rule or selects a defensible decision.

Performance evidence

The employee correctly carries out the relevant task under observed conditions.

Use each result for the conclusion it can actually support.

2-103.11(D), (G)-(L), (O); CDC Quality Training Standards 7-8

BASIS: CODE DUTIES + TRAINING PRACTICE

Monitoring Continues After Training

Observe

Check the controls during real work, not only during a lesson.

Respond

Address the unsafe condition and identify why the control failed.

Verify

Check that the correction works; revisit the training or process when needed.

A training record is not a current food-safety measurement.

2026 FDA model Food Code: 2-103.11(D)-(L); 1-201.10, Active Managerial Control; 2-103.11 lead-in

BASIS: FDA MODEL CODE + GUIDANCE

Refresh Training When the Need Changes

New assignment

Prepare the employee for unfamiliar controls before independent work.

Changed product or process

Review new labels, equipment, recipes, and procedures.

Observed gap

Target the missed knowledge or skill and check the result.

Timing

Use identified needs; confirm any separate local renewal requirements.

A calendar reminder is useful; it is not a substitute for responding to a change.

Keep Records That Say What Was Established

Participation

Who completed which content, and when.

Assessment

What explanation or performance was checked, and the result.

Follow-up

What remained unresolved and what later evidence closed the gap.

Limits

Follow applicable record rules; do not invent a universal staff-training retention period.

Attendance, knowledge, and demonstrated skill are different record claims.

Course Recap: Explain, Apply, and Check

Recall

Explain the rule with its important conditions before looking at the guide.

Apply

Use a new restaurant situation and explain why competing choices do not fit.

Demonstrate

Practice measurable tasks and use feedback to close specific gaps.

Revisit

Return to weak topics; keep routine workplace monitoring in place.

Understand the control and its conditions, not just a remembered answer letter.