# The Commonwealth of Massachusetts

Executive Office of Health and Human Services
Department of Public Health - Bureau of Environmental Health
Food Protection Program
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**Vibrio parahaemolyticus Retail Investigation Checklist for Local Health Agents**

| | |
|---|---|
| Establishment Name<br>Address | Inspectors Name<br>Date<br>Time in Time out |
| Type (*restaurant, market, event*) | Person-In-Charge |
| Phone # | Email |
| Consumption Date | Food Consumed |
| Shellfish tags remain with bags in cold storage and retained for 90 days in organized file? ☐Yes ☐No<br>Oysters labeled when on display? ☐Yes ☐No<br>Date last shellfish removed from bag for sale or service? | |
| Identify where shellfish have been stored and ambient temperature of all<br>(*e.g. shellfish coolers, kitchen, prep area, shellfish raw bar, display cases, reach-in coolers*)<br><br>Shellfish iced? ☐Yes ☐No | |
| Evidence of temperature abuse? ☐Yes ☐No<br>Describe any evidence of temperature abuse: | |
| Evidence of cross-contamination? ☐Yes ☐No<br>Describe any observations of cross-contamination: | |
| Evidence of mishandling? ☐Yes ☐No<br>Describe any observations of mishandling: | |
| If an inspection is conducted, please note that photos are helpful.<br>Please submit this form, an inspection report if conducted, and copies of additional requested documentation if applicable to FPP. | |

Please make notes of the firm's standard operating practices or any observations:

## HACCP Risk Assessment

## City/Town of:_____

| **Product/ Process:** | | **Establishment Name** |
|---|---|---|
| **Ingredients** | **Source** | **Address** |
| | | **Person-in-Charge** |
| | | |
| | | **Information for the Risk Assessment was obtained by:**<br>☐ Observation of Suspect Food/Process<br>☐ Observation of General Food Handling and Sanitation Practices<br>☐ Interview with Food Employee Responsible for Preparing Implicated Food.<br>☐ Interview with Person-in-Charge or Other Employee |
| | | |
| | | |
| | | |
| | | |
| **Weight/Volume of Suspect Food Prepared or Served:** | | **Dates of Investigation:** _____ |

PLEASE PRINT CLEARLY

| | **Describe Product Flow (Preparation Steps)**<br>Who, What, Where, When | **Describe Environmental Data Collected to Verify Control or Lack of Control of Hazards** | **HAZARDS**<br>-**C**ontamination<br>-**S**urvival<br>-**P**roliferation | **Describe Corrective and Preventive Measures Initiated**<br>(Include changes in food handling procedures, orders for correction, embargoes/disposals, food employee restrictions, food safety training, emergency suspensions and closures, etc.) | **Date Verified** |
|---|---|---|---|---|---|
| ☐CCP (Critical Control Point) | | | | | |
| ☐CCP | | | | | |
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|---|---|---|---|---|---|
| ☐CCP | | | | | |
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**Comments:**

# Vibrio Traceback Guidance

## Background

Vibrio parahaemolyticus (Vp), Vibrio Cholera (Vc), and Vibrio vulnificus (Vv) are pathogens naturally found in raw **OYSTERS**. When illnesses are identified, a detailed investigation is required to determine the source of the illness and to prevent further illnesses. A stool sample is needed to identify the pathogen. When a Vibrio illness is reported after lab testing, food histories are collected by an epidemiologist or public health nurse and frequently reveal the consumption of raw oysters, or other shellfish or raw/undercooked seafood. An open wound exposed to seawater may also be the source of infection.

After obtaining a food history, the next step in the investigation begins at the retail restaurant, market, or event where the oysters were consumed or purchased. This guidance document will overview the investigation from the inspectors' point of view at the retail site and overview how to collect appropriate information needed to direct the investigation back to the wholesale dealer.

## Retail Traceback and Investigation by Local health Agent

On arrival at the retail food establishment, identify yourself (**local health agent**) to the Person-In-Charge and state the reason for your investigation.

- Establish that the firm is properly permitted.
- Conduct a HACCP risk assessment of the implicated food, following the possible routes of oysters served at the establishment (Receiving, Storage, Prep Areas, Kitchen, Cold Holding Display Cases, Raw Bar, Menu, display boards, etc).
- Identify any evidence of cross-contamination, mishandling, or temperature abuse
    - Evaluate storage and handling practices to determine any cross-contamination or mishandling of oysters
- Observation how the oysters are received from the **wholesale dealer**
    - Are they picked up by the food establishment or delivered?
    - Are they refrigerated during transport?
    - Are they put away immediately or left out in the kitchen?
    - Who is responsible for putting them in the walk-in cooler?
    - When stored in the cooler, at what temperatures are the coolers set? Take a temperature of oysters in the food establishments cooler. Overcrowded coolers may have trouble maintaining temperatures <41°F.
    - Is there a cooler log with recorded temperatures?
- Review how the firm handles **tags**
    - Are all bags or containers properly identified with tags?
    - Does the firm maintain the tags for 90 days following the consumption of the last oyster?
    - Are the tags held in an organized manner?
    - Has the firm recorded the date on the tag that the last oyster was served from a bag?
- Review how the firm keeps their **inventory**
    - How is shellfish stored? i.e. Are they held separately, or do they set one lot on top of one another (nesting)?

    - Does the firm segregate the shellfish from other hazardous foods?
    - Is the shellfish iced?
    - Is there a FIFO rotation of inventory?
    - What sanitation practices are in place for the areas of storage, preparation, holding, and service?
- Review how the firm conducts **service**
    - When readied for service, how are the oysters (or other shellfish) prepared (e.g., washed, cleaned, scrubbed, rinsed) and held (e.g., container, sink, display table, iced, cooler) prior to service?
    - Are the oysters shucked in advance or shucked to order?
    - Are the oysters shucked with the same utensils and/or in the prep area as other shellfish?
    - How many people typically shuck shellfish?
    - What are the practices of the person who shucks the oysters?
    - Who was working and shucking on the date of consumption?
    - Are the oysters exposed to warm temperatures for any extended periods of time?
    - How are oysters handled when ordered from the menu vs. when ordered from the raw bar?
    - How are varieties of oysters displayed at the raw bar?
    - How are oysters identified in the oyster display?
        - How are they identified by wait staff who served them?
    - Is there a "specials" board for branded oysters served?
        - Often, a "buck-a-shuck" promotion only uses one type of oyster.
    - Does the firm keep track of what oysters were served on each date?
    - Is the oyster brand identified on a register receipt?
    - What does the firm do when they run out of a particular oyster?
        - Do they substitute another brand?
        - Is the consumer informed of the substitution?
    - What does the firm do with oysters prepped for service, but not sold on a particular evening?
    - Are there adequate hand washing facilities for those at the raw bar?
    - Do the employees practice good hand washing skills?
    - Have any illnesses been reported by staff to management?

**Retail Traceback and Investigation by FPP**

Beginning in 2022, the following will be conducted by an **FPP Inspector**. Retail document collection and review will be done remotely.

The inspector must use the food history of the ill individual(s) to determine what oysters were most likely served on the consumption date. At the retail level, the investigation must include a review and collection of copies of records, including:

- Appropriate invoices
- Bills of lading (BOL's)
- Shellfish tags
- Guest receipts with the last 4 of credit card
- Inventory or sales control records

- Menus, signboards that state what oysters were served
- Receiving and cooler temperature records

The FPP Inspector will conduct the following:

- **Ask the firm manager,** "What was the shellfish that was most likely consumed on the date when the person was eating in your establishment?"
- Review BOL's or invoices for oysters delivered to the firm on or just prior to the date of consumption.
- Ask how frequent shellfish deliveries are made, what days, which vendors?
- Ask how many oysters are sold per day to determine the rate at which the firm is going through inventory.
- Did the firm have some inventory on hand when they had the delivery?
- Consider that the firm may receive oysters from different suppliers and on different days.
- **Collect copies of the records** (invoices, bills of lading (BOL's), and shellfish tags) for the shellfish that was received by the food establishment and the shellfish which was in inventory on or before the date of consumption.

When looking at inventory control or sales data records provided by the food establishment, note how many are served individually, as a ½ or whole dozen, those that may be used on other raw platter combinations, as well as those that may be used in cooked offerings to get an accurate assessment of the rate in which a food establishment may be using inventory.

Shellfish tags collected should include one for each representative lot potentially available on the date of consumption. If six bags of 100 count oysters were received and they all were from the same lot (Harvest Area, Harvest Date, and Dealer) then only 1 tag is necessary. If there are variations in harvest dates, harvest areas, or suppliers, then one for each is necessary. With multiple oyster brands available, all different lots must be considered, including those likely in inventory on the consumption date.

Ask if the firm receives any shellfish other than from dealers. Assess if the tags agree with the information on the BOL or invoice. **The date on which the last shellfish was removed from the bag for service or consumption should be recorded on each tag; this date can <u>exclude</u> shellfish that were sold <u>prior</u> to the date of consumption.**

Document all deficiencies and violations in your report.