

POLICY BRIEF

A Preliminary Review of the Just.Safe.Food Training Program

Analysis by Beth Torin

Ms. Torin is the Former Executive Director of the New York City Department of Health Office of Food Safety

EXECUTIVE SUMMARY


Food safety is a critical part of restaurant jobs, not just for the customer, but for employees as well. While local and state requirements for training employees who handle food vary, there are also various programs designed to equip food service employees on proper safety, hygiene, and other techniques while handling, preparing, serving, and storing food in restaurants.

One widely used training course is called the ServSafe Food Handlers (SFH) program, developed by the National Restaurant Association (NRA). In early 2023, advocacy nonprofit One Fair Wage announced it would launch its own food safety course called the Just.Safe.Food “Food and Worker Safety Training” (FWST).

One Fair Wage claimed its new program would be a cheaper, better substitute for food safety training than ServSafe. To assess these claims and the comprehensiveness of the training as a viable alternative, the Employment Policies Institute (EPI) retained Beth Torin, whose career in food safety includes fourteen years as the Executive Director of New York City’s Department of Health Office of Food Safety. Ms. Torin independently evaluated Sections 1-8 of Module 1 of a draft of the Just.Safe.Food training, which were obtained through [JustSafeFood.com](https://justsafefood.com/).¹

¹ Accessed January 24th, 2023 at the following URLs: [JustSafeFood.com/food-safety-pt1-mp4](https://justsafefood.com/food-safety-pt1-mp4/); [JustSafeFood.com/food-safety-pt2-mp4](https://justsafefood.com/food-safety-pt2-mp4/); [JustSafeFood.com/food-safety-pt3-mp4](https://justsafefood.com/food-safety-pt3-mp4/); [JustSafeFood.com/food-safety-pt4-mp4](https://justsafefood.com/food-safety-pt4-mp4/); [JustSafeFood.com/food-safety-pt5-mp4](https://justsafefood.com/food-safety-pt5-mp4/); [JustSafeFood.com/food-safety-pt6-mp4](https://justsafefood.com/food-safety-pt6-mp4/); [JustSafeFood.com/food-safety-pt7-mp4](https://justsafefood.com/food-safety-pt7-mp4/); [JustSafeFood.com/food-safety-pt8-mp4](https://justsafefood.com/food-safety-pt8-mp4/);

Additional sections not reviewed include “what to do in case of a workplace emergency,” “workers’ rights and legal assistance,” and “how to identify and document cases of workers’ rights violations” <https://justsafefood.com/>



In the following report, Torin finds the available Module 1 of the One Fair Wage alternative program has significant deficiencies that would leave participants unprepared for handling food, including:

- Misleading or inadequate training visuals
- Inaccurate terminology related to industry standards
- Missing or inaccurate training content, including on topics such as hazards causing foodborne illness, handwashing, and proper glove usage

These issues may not arise in other sections of the Just.Safe.Food training, but the initial review of this program raises red flags about the quality of the product One Fair Wage is promoting to employees and the media.

Whether or not an employee is required to take a food safety course prior to starting work in the restaurant industry is dependent on the jurisdiction, but Torin points out that restaurants and their employees are not limited to any specific training course and have several options to complete the training that will best serve employees and ultimately, customers. National-facing organizations such as the American National Standards Institute (ANSI) evaluate such programs through their National Accreditation Board (ANAB) to ensure employers and employees are getting complete, accurate information for their jobs.

Instead of providing a good-faith, quality alternative to the various food safety courses available, One Fair Wage has used the issue as a tool to smear its opponents.² Restaurants and restaurant employees who are seeking a high-quality training may not find it in the product offered by One Fair Wage.

Rebekah Paxton
Research Director, Employment Policies Institute

² <https://www.restaurantbusinessonline.com/operations/attacks-servsafe-badly-need-scrubbing>

Comparing Food Safety Training Programs: Prioritizing the Empowerment of Food Service Workers

In many jurisdictions, before starting a job in the food service industry, employees are required to complete a food safety course. In others there is no such requirement. Either way a prudent food service operator should encourage his staff to take a course to improve food safety in the establishment. Not limited to any single provider, food service employees and their employers have several options to complete this training.

During my time serving the New York City Department of Health Office of Food Safety, I came across several of these programs including ServSafe and learned how they served workers in the process of teaching food safety. New York City has no requirement for staff but requires its own Food Protection Certificate (FPC), and requires that the supervisor of operations with an FPC must be on duty at all times.

This assessment provides a preliminary review of the Just.Safe.Food “Food and Worker Safety Training (FWST) on its merits, compared with the ServSafe Food Handlers Program (SFH).

OVERVIEW


The ServSafe Food Handler Program (SFH) is a course administered by the National Restaurant Association, which describes the program as “a complete solution that delivers consistent food safety training to employees.”³

The Food and Worker Safety Training (FWST) is a course under the Just.Safe.Food program launched in 2023 by One Fair Wage, a nonprofit advocating for minimum wage increases. According to the Just.Safe.Food website, the program is described as “an online food handling course that educates participants on safe food preparation and handling techniques, intended for anyone working in food preparation, storage and service.”⁴

FWST states that “Course graduates can be inferred to (i) intend to become “food handlers,” as defined by [California’s] SB 303, (ii) have completed all sections of the training modules in the FWST, (iii) have passed, or

3 <https://www.servsafe.com/ServSafe-Food-Handler>

4 <https://justsafefood.com/course-details/>



achieved at least 70% on the test at the conclusion of the course, (iv) obtained a food handler card, valid for 3 years from date of completion.”⁵

Most states do not require food protection certificates for food handlers, and those that do often have special requirements. California and Florida have their own programs to certify food handlers, and other states require American National Standards Institute (ANSI) certification through its National Accreditation Board (ANAB) or have other specific requirements. In some states, individual counties and cities have their own regulations. New York City for example, with over 24,000 restaurants, only requires that the manager have a Food Protection Certificate.

It is an experienced and well-advised operator who takes the initiative to obtain certification for all food handlers so that they have a basic understanding of the requirements. This undoubtedly improves food safety in an establishment and ensures that guests are safe. Regardless of state- or city-level requirements, complete and accurate training programs are critical to this mission.

Both FWST and SFH offer a test and certificate for employees. But which certificate represents a complete, accurate training for food handlers?

PROGRAM DEVELOPMENT

The challenge when developing any training program is to ensure that it is geared toward all learners. Students learn in many ways: There are students who are visual learners, students who do well reading information, and others who learn best with lectures. Developers should also confirm that students are familiar with the industry’s acceptable terminology, as they should be using the correct terms and spelling. It is important to provide the learner with the basic principles of the program and to avoid confusing them with examples that make it more difficult to identify the material. The incomplete or inaccurate visuals in the FWST course are more of a distraction than a teaching tool. For example, the video discussing cooling (Module 1, Part 5) shows foods that are out for service (Module 1, Part 5, 01:54) or on a hot food line (Module 1, Part 5, 02:09) rather than being in a refrigerator in small shallow pans. This continues throughout the videos.



Food shown out for service in Module 1, Part 5, 01:54 while discussing cooling

Proper cooling must be done in a refrigerator or blast chiller, but the FWST video on cooling shows food sitting out at room temperature (Module 1, Part 5, 00:34, 01:56, 02:01).



Food shown sitting out at room temperature at Module 1, Part 5, 00:34, 01:56, 02:01 when discussing cooling

In these Module 1 videos, FWST never discusses the use of ice baths or the other two acceptable means of cooling: using a paddle or blast chiller. The only cooling method that is discussed is refrigeration. It is best to identify all means of cooling so that the worker can determine the best course of action for the product they are cooling.

CONTENT

The FWST training program is severely lacking in terms of content consistency and keeping all types of learners in mind, as well as in other crucial ways. It does not compare to SFH in quality or in supplying the basic concepts of food safety. Throughout the program, bare hand contact can be seen, incorrect or outdated terms are written, and poor employee hygiene practice is shown (see following sections for examples). There is also significant incorrect or missing necessary information to properly train employees. At times, the voiceover script simply says “etcetera” rather than detailing crucial information.

Incorrect Terminology

Problems with the FWST training start with incorrect or misleading terminology. While the modules often eventually use correct terminology, these terms are often mixed in with additional words and descriptions that are not typical industry standards and thus are confusing and potentially misleading. While these examples may seem like relatively minor infractions, the food service and food safety industries exist to ensure the utmost attention to detail, and disregard for these standards could pose serious health and safety risks.



Food Safety Module 1

Part 1: Food Born Illness

1. Introducing harmful germs, toxins, or chemicals that cause illness

2. Introducing physical objects into the food

The FWST program’s first video features the words “food born” (Module 1, Part 1, 00:07), however, the correct word is foodborne, which is an industry standard term.

The program goes on to inappropriately use the term “germs” in relation to food safety (Module 1, Part 1, 01:45), but the correct industry terms are only pathogens or bacteria.

It is crucial that the correct terminology is used when training staff. FWST refers to certain foods interchangeably as “potentially hazardous foods” (PHF) but also as “time and temperature-controlled foods” (TCS). Time and Temperature Controlled is the accepted terminology used by the Food and Drug Administration (FDA) and other regulatory agencies, and should be the only term used when discussing proper storage and cooking temperatures.

Photos feature title slide and information slide of Module 1 Part 1 at 00:07 and 01:45 featuring misspellings and incorrect terminology.

Handwashing and Drying

Hand sinks and hand washing are mandatory in a food service establishment. Sanitizer is not a substitute for hand washing, which is required by code. FWST states soap and water is the preferred method for hand cleanliness, and hand sanitizer can be used “only when you absolutely cannot use soap and water.” (Module 1, Part 2, 02:25-02:32). The video then later states sanitizer should only be used “after washing your hands.” (Module 1, Part 2, 02:40).



Informational slide shows nondescript renderings of bottles while improperly describing the interchangeable use of hand sanitizer and hand soap in Module 1, Part 2, 02:40.

Bar soap, which is shown being used in FWST’s training video (Module 1, Part 2, 02:21, 03:21, 04:48), is not permitted in food service establishments because it spreads bacteria.



Photos shown in Module 1, Part 2, 02:21, 03:21, 04:48 improperly show bar soap when discussing handwashing

FWST mentions the use of an air dryer (FWST Module 1, Part 2, 01:08 and 03:22), which may be more eco-friendly, but is not as safe or ideal as using paper towels. Paper towels are safer than air dryers because they remove residual bacteria during drying, whereas air dryers have the potential to dry the residual bacteria in place. The video emphasizes that paper towels should be single use only, but shows images of reusable cloth towels (Module 1, Part 2, 03:22).



Photo shows reusable towels when discussing hand drying should only be with single use paper towels in Module 1, Part 2, 03:22.

One of the general rules of food safety is that when employees take a break, leave the kitchen, or use the restroom, they must remove their apron for sanitary reasons. This important step is also not shown in the FWST Module 1 videos when discussing best personal hygiene practices.

Temperature Standards

The “danger zone” is identified for food that is between 41 degrees Fahrenheit and 135 degrees Fahrenheit. This is the industry standard temperature range where bacteria can grow in the presence of food. The SFH program along with federal agencies such as the Food and Drug Administration (FDA) and U.S. Department of Agriculture (USDA) all use this temperature range as standard.

The FWST program introduces this range as “between 42 to 134 degrees Fahrenheit.” While this is within the correct range, it will prove to be confusing for food service workers, and the rest of the industry uses a standard 41-135 degrees Fahrenheit. The FDA food code explicitly states cold foods should be kept at 41 degrees Fahrenheit or below, and hot foods at 135 degrees and above.⁶ The training goes on to specify that cold foods should be held “at or below 42 degrees Fahrenheit” (Module 1, Part 3, 02:05) and hot foods should be held “at or above 135 degrees Fahrenheit” (Module 1, Part 3, 02:10). This language in the FWST training is inconsistent with its own initial statement about the danger zone temperature range, inconsistent with industry standards, and will prove confusing to employees about which temperatures are within and outside the danger zone range.

When talking about cooking temperatures for various animal protein products (Module 1, Part 4, 00:33-01:32), a time must be included for all items. For example, poultry must be cooked at 165 degrees Fahrenheit for 15 seconds. FWST does not include these critical time requirements with specific temperatures for each category of

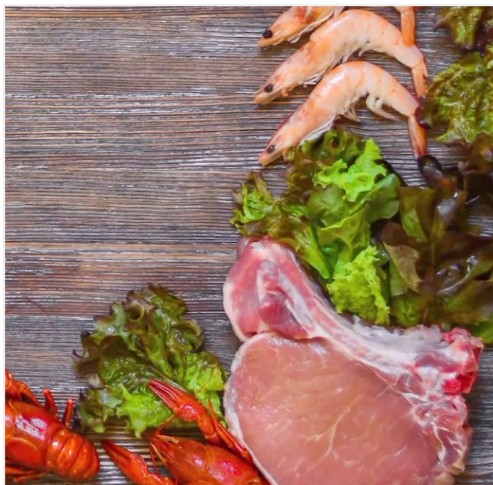


Photo in Module 1, Part 4, 00:22 only shows some examples of animal protein.

proteins, which are required by both FDA and USDA regulations. After providing the various temperature requirements for different categories, the FWST instructs employees to use a food thermometer and “wait 15 seconds until the temperature listed holds” (Module 1, Part 4, 01:57-02:05). This is potentially confusing and does not give clear temperature and time instructions for each category of animal protein and “hot held” foods, as per FDA and USDA requirements.

When the FWST program teaches cooking temperatures it should use the terms “protein” or “animal protein” when referring to meats and poultry as opposed to only giving examples (Module 1, Part 4, 00:22). It is difficult to grasp a concept when the terminology does not match that which is used in the kitchen.

Gloves Versus Bare Hand Contact

It is standard industry practice that an employee must wear gloves or have a barrier between hands and ready-to-eat food. Ready-to-eat food is food that will not receive any additional heat treatment. Therefore, any bacteria that is added to the food will not be killed, causing an increased risk of food borne illness.

Throughout the training, FWST depicts improper bare hand contact on ready-to-eat food (Part 1, Module 6, 00:42, 00:46, 01:14).



Photos show improper bare hand contact on ready-to-eat foods in Part 1, Module 6, 00:42, 00:46, 01:14.

Conversely, the video also shows gloved hands preparing uncooked meat (Module 1, Part 2, 02:59; Module 1, Part 6, 01:23). This meat will be cooked, so there is no reason to wear gloves. This only contributes to the misuse of gloves in a kitchen and to an increased risk of cross contamination.



Photos show improper glove contact on uncooked meat in Module 1, Part 2, 02:59 and Module 1, Part 6, 01:23.

When training programs are prepared, developers need to confirm that messages are consistent in all parts of the program to avoid confusing trainees and promoting the wrong instructions.

Vague Instruction on Sanitizing Chemicals

There are other areas of concern in the FWST program, including vague instruction on use of chemicals for proper dish and equipment sanitization. For example, the training mentions only “examples” of proper sanitizing solutions, including 100ppm chlorine solutions or 25 ppm iodine solutions (Module 1, Part 7, 01:44-02:00). However, FDA food code regulations require these solutions to have specific minimum temperatures to ensure efficacy. These regulations also specify various water pH requirements and other effective chemicals, such as a quaternary ammonium compound, that ensure effective sanitizing solutions.⁷



Renderings show example solutions for sanitization without proper instructions in Module 1, Part 7, 01:44-02:00.

There is also no discussion of the importance of using test strips in sanitation, which is key information and ensures creation of proper, effective sanitizing solutions.

These issues should be corrected for FWST to be a reliable training program.

MAINTAINING CREDIBILITY

SFH is accredited by the American National Standards Institute National Accreditation Board (ANAB) and the Conference for Food Protection (CFP). SFH is a training program that was developed to maintain the standards and safety of the professional workers in the restaurant and food service industry. FWST was not accredited by ANAB at the time of this publication and therefore has not met their standards. It is important for them to receive this accreditation as soon as possible to maintain their credibility.

CONCLUSIONS

While both courses provide information for food workers, employers have the choice of which program to use for their staff. SFH is clearer, more concise, and gives examples that are more easily understood by students. Choosing a course that uses the acceptable terminology and the correct standards is in the restaurant operator's best interest. This will ensure trained employees who have accurate and sufficient food safety knowledge.

It is recommended that FWST review their program with a qualified sanitarian and then submit it to ANAB for standardization. This will assist in improving not only the quality of the course, but the accuracy of the information that is being provided.

No matter which program is used, the program should be available in the many languages that we find in kitchens today. A certificate often empowers employees and proves to them that the owner of the establishment values their position. Unfortunately, these certificates are not always required by regulatory agencies but are exceptionally valuable to the food service operator.

Employee behavior is one of the major causes of the distribution of foodborne illnesses. Teaching the correct behavior in ways that employees understand can only add to quality food safety in a food service establishment.