



A Healthy Pima County
Every one. Every where. Every day.

Consumer Health and Food Safety
3950 S. Country Club Rd. Suite
2301
Tucson, AZ 85714
520-724-7908
www.pima.gov/health

Scanned via email

December 3, 2021

[REDACTED] Development Coordinator
[REDACTED] Health Program Manager
International Rescue Committee
1011 N Craycroft Rd Suite 404
Tucson, Arizona 85711

RE: International Rescue Committee investigation findings and food safety recommendations at Red Roof Inn 1300 N Stone AVE Tucson, AZ 85705

On November 22, 2021 the Pima County Health Department (PCHD) Director Theresa Cullen was made aware of multiple cases of gastrointestinal illness including acute nausea and vomiting among the International Rescue Committee clients staying at the Red Roof Inn on Stone Ave. As a result, on November 23, 2021, the Foodborne illness response team consisting of Consumer Health and Food Safety (CHFS) Environmental Health Specialists and Epidemiologists went to Red Roof Inn to conduct an environmental assessment and investigation. On November 26, 2021 an environmental assessment was also conducted at the unpermitted residential home kitchen of the community volunteer organization ELFA, who prepared the meals for the clients of IRC.

After reviewing on-site assessment reports, confirming food sample specimens with Arizona State Public Health Laboratory, photos of Red Roof Inn, and the Environmental Assessment at the residential unpermitted kitchen of the ELFA organization, specific concerns were documented that must be addressed regarding continued safe food service.

ISSUE: The current food preparation and service area at Red Roof Inn does not have a PCHD food service issued permit to operate. ELFA organization who prepared the meal in a residential kitchen does not have a PCHD issued permit to operate.

Major concerns include:

- The epidemiological case information collected from clients found the illness affected all ages, one year to forty-four years of age. Fifty-six out of ninety-nine clients reported illness of acute vomiting after eating the meal prepared by the EFLA organization.
- Environmental Specialists collected left over food samples (beef and macaroni dish) from the refrigerator at the hotel. The food sample specimens were sent to the Arizona State Public Health Laboratory for testing. The laboratory confirmed positive results. Arizona Department of Health Services Foodborne Epidemiologist reported that six food samples were positive for staphylococcus enterotoxin. The identification of this toxin was reported to the Center for Disease Control.
- Based on the analysis of the IRC client interview data, the laboratory results, and the findings

from the environmental investigation, the confirmed vehicle was the macaroni and beef dish, likely due to improper food handling by temperature abuse. No thermometer used during any step of food preparation to ensure beef was fully cooked. No procedure or steps taken to ensure that cooked beef dish cooled properly prior to being stored in refrigerator. Improper cooling of cooked foods.

- An approved permitted food establishment is required to have procedures in place to ensure safety of foods.

Mediation of these findings is required to support food services at Red Roof Inn.

Proposed options include:

Option A

Obtain a permit as a catered feeding site. This process can begin with a site evaluation to determine equipment necessary for approval. A catered feeding site permit allows facilities to hold and serve prepared food for immediate service. This permit does not allow for preparing food, cooking, or reheating on-site. All food must come prepared ready to serve from an establishment with a current food permit. Additional food service options may be discussed during an on-site evaluation.

Minimum Requirements for Permitting

The following items are minimum requirements based on the description of food service at the facility; all requirements are dependent upon how food service will occur.

- A handwashing sink to ensure that the staff can wash their hands before serving food and throughout the food handling process. The hand sink must be supplied with hot (min. 110 degree F) and cold water, soap and paper towels. The designated hand sink cannot be located in a restroom and can only be used for hand washing. The hand sink must be located in the food service area. Portable hand sinks are not permitted.
- A restroom must be available for use by employees and volunteers.
- Stainless steel tables are strongly for food plating. All surfaces must be smooth and easily cleanable. Able to withstand cleaning agents.
- Hot and cold holding equipment is necessary to facilitate food service. If the facility stores cold food, adequate commercial cold holding refrigeration equipment must be supplied. Chafing dishes cannot be used for hot holding; electric NSF heat and hold units must be used. Any equipment that requires drainage must be indirectly drained.
- A three compartment sink to wash food service utensils or a standard operating procedure (SOP) explaining the process if there is no three compartment sink on site. Additional options include returning all used utensils to the caterer for cleaning and sanitizing or using disposable utensils for food serving.
- Sneeze guards or other barriers are required for food services lines where open or exposed foods are displayed/provided.
- All equipment must be ANSI/NSF approved for food service.

- A mop sink facility (may be a laundry room or utility sink) for mop cleaning or similar wet floor cleaning is required. The area must provide the capability to dispose of mop water and similar liquid waste.
- Approvable finishes of walls, floors, and ceilings in the food service area; all surfaces must be smooth and easily cleanable.

Option B

Obtain a full permit as a food establishment/restaurant. This will allow the facility to prepare food, cook and cool food on-site. This option requires plan review with CHFS. A full set of architectural drawings will be required for review and approval prior to construction beginning.

Minimum requirements include:

- An NSF approved three compartment sink
- Commercial cooking/reheating equipment
- Sufficient NSF approved hand sinks based on amount of food preparation.
- NSF approved food preparation sink may be needed to support food production.
- If the exterior space is needed for food service production one option to consider is enclosing the outdoor space to secure this space from the elements.

Currently, until a permanent solution can be implemented, food service provision must be modified.

International Rescue Committee must receive food from a permitted food establishment or caterer. All food must be received from the caterer in individually plated portions and ready to serve (brown bag meals, individual meal containers). Food must be provided either cold/hot and ready to eat. Ensure that temperature controlled for safety (TCS) food is received hot at 135 F or above, and cold held TCS foods received at 41 F or below. The Red Roof Inn and IRC is not currently permitted to heat and serve food, hold food or receive food in large pans and re-plate it. Food will need to be served to guests as soon as it is received from the caterer. Regardless, hand washing sinks must be provided in all food service areas. If the guest has access to a microwave, the guest can reheat the individual meal themselves. If the guest has access to a refrigerator, they can take the full meal to their room immediately and store in the refrigerator for future consumption.

Home baked cookies, brownies, muffins and other baked goods can be provided by volunteers if they participate and register with the Arizona Department of Health Services for the Cottage Food Program. Commercially prepackaged baked goods and shelf stable individually packaged snacks can be provided without a permit.

[ADHS - Cottage Food - Program Registration \(azdhs.gov\)](http://azdhs.gov)

Volunteer organizations cannot continue to make food in unpermitted kitchens and deliver the food to Red Roof Inn to be served. ELFA must be permitted with CHFS before they can provide any food not covered by the Cottage Food Program.

RECOMMENDATION: PCHD recommends Option A in order to safely and quickly proceed with meal service at the Red Roof Inn.

Please let us know how you would like to proceed with food service. If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Loni Anderson". The signature is fluid and cursive, with the first name "Loni" and last name "Anderson" clearly distinguishable.

Loni Anderson, RS
Division Manager

Attachments: proper food storage, techniques for cooling food, cooling food infographic

cc: Theresa Cullen, Health Department Director
Vic Pereira, Health Department Deputy Director, Operation
Paula Mandel, Health Department Deputy Director, Clinical Services
Heather Mc Govern, Epidemiology Program Manager
Anissa Taylor, Epidemiologist
Lauren Dinauer, Environmental Health Specialist