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Comment from Shauna Henley, Drexel University

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General Comment

Comments for the Agency Information Collection Activities, Proposed Collection; Comment Request, Food Safety Survey ID: FDA-2013-N-1161-0001.

To the FDA PRA Staff,

Hello, my name is Shauna Henley (shaunahen@gmail.com) and I'm a 4th year PhD. Candidate at Drexel University, located in Philadelphia, PA. My PhD at Drexel will be in Biology with a concentration in nutrition sciences or community nutrition. Over the past 4 years my research has focused on identifying and addressing a poultry mishandling practice among racial and ethnic minority populations. My mentor throughout this project has been Dr. Jennifer J. Quinlan, associate professor (jjq26@drexel.edu).

I strongly feel that future FDA/FSIS Food safety surveys should seriously consider adding more culturally relevant questions to reflect America's changing food culture, which is largely influenced by various racial and ethnic minority populations. My research modified the 2006 FDA/FSIS consumer food safety survey, and some specific recommendations would include survey items asking about whether or not interviewees:

1. Prepare offals at home - as a source of cross contamination
2. Wash raw poultry and meat - this is a prevalent practice across all racial and ethnic populations and we ran a campaign "Don't Wash Your Chicken!"
3. Cooking a turkey overnight – can lead to temperature abuse

I held focus groups with racial and ethnic minority populations (Henley et al., 2012), which allowed me to modify your 2006 FDA/FSIS consumer food safety survey to accommodate the needs of my study (sections A, D, E, H, J, and P). The modified 2006 FDA/FSIS survey consisted of 118-items that were roughly 60 items from the original 2006 FDA/FSIS questions and approximately 60 items deriving from my focus groups with minority populations (Henley et al., 2012). The modified survey was reviewed by experts in the fields of food safety, survey design, and culturally appropriate research design. The modified survey was administered via random digit dialing, and administered to approximately 100 Caucasian, 100 African American, 100 Hispanic, and 100 Asian consumers.

The results identified that Hispanics and Asians prepare more offals, which have been a vehicle in previous foodborne illness outbreaks (Jones et al., 2003, Ong et al., 2012). Consuming offals may not represent the actual route of transmission, but rather preparing these foods in a domestic environment where cross contamination can occur, may be more problematic.

Similarly, we found that across all racial and ethnic populations, but especially among minority populations' consumers wash raw pork and poultry, regardless of the size of the meat cut. Washing can lead to cross contamination, and the prevalence of this unsafe food handling behavior led to a food safety education campaign "Don't Wash Your Chicken!" (Drexel.edu/dontwashyourchicken).

Lastly, cooking a turkey overnight (e.g. the turkey is put in the oven to cook at 11p-2am, and cooked low and slow). This practice was most prevalent among African Americans (Henley et al., 2012). Cooking a turkey overnight may allow for temperature abuse, similar to improper holding temperatures after the turkey is cooked (my modified 2006 FDA/FSIS survey). In addition, not removing the stuffing from the turkey's cavity before storing the leftover has been an unsafe food handling behavior identified among disadvantaged women (Trepka et al., 2007).

The unique and unsafe food handling behaviors of minority populations has been explored on a small scale. Being able to incorporate some unique food and culture questions among a larger population may shift food safety education to better reflect America's continually changing demography.

Please feel free to contact me with any questions or concerns. Dr. Quinlan and I identified other unsafe and unique handling behaviors among minority populations in our modified survey that were not mentioned here, but warrant further exploration in your survey.

Thank you very much for your time.