



State of Arizona
Department of Education
Office of Diane M. Douglas
Superintendent of Public Instruction

HNS-11-2016

Memorandum

To: Sponsors of the National School Lunch Program, Child and Adult Care Food Program and Summer Food Service Program

From: Mary Szafranski, Associate Superintendent
Arizona Department of Education, Health & Nutrition Services Division

Date: August 9, 2016

Subject: Safely Using Produce Grown from School Gardens in School Meal Programs

Original Signed

This memo replaces all previous memos¹ developed by the Arizona Department of Education, Health and Nutrition Services on the topic of food safety and school garden produce used in school meal programs. It provides updated information on new legislation, per HB2518, that clarifies how produce grown in school gardens may be used in School Meal Programs in every county of Arizona.

Law Prior to HB2518

A.R.S. 36-136 H. 4 (h) instructs the Director of Arizona Department of Health Services to adopt food safety regulations to ensure that all food or drink sold at the retail level, provided for human consumption, is free from unwholesome, poisonous, or other foreign substances, filth, insects or disease-causing organisms. The rules are required to prescribe standards for processing, handling, serving and transporting products and sanitary conditions for facilities. An exemption from regulations exists for food and drinks that is:

¹ NSLP 16-11/SFSP 04-11/ SP# 32-2009 and CN#24-12/ FD#04-12



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- Served at a noncommercial social event in a workplace;
 - Prepared at a cooking school in an owner-occupied home;
 - Not potentially hazardous and prepared in a private home kitchen;
 - Prepared or served at specified employee-conducted functions;
 - Offered at a child care facility if it is commercially prepackaged or is a whole fruit or vegetable that is washed and cut on-site for immediate consumption;
 - Offered at locations that sell only commercially prepacked foods; or
 - Specified baked and confectionary food prepared in a private home.

Revisions made to A.R.S. 36-136 H. 4(h) requires Director of the Arizona Department of Health Services to, by rule, exempt from food safety regulations fruits and vegetables grown in a public school garden that are washed and cut on-site for immediate consumption.

Food safety is an important aspect of the Child Nutrition Programs. School garden produce has been historically considered an unapproved source for use in school meal programs in some counties due to language used in the Arizona Food Code, of which, local county environmental health departments have the authority to interpret for the protection and safeguarding of public health. In 2011, the Arizona Department of Health Service (ADHS) established its School Garden Guidelines and certification through its School Garden Program to encourage food safety best practices in the school garden. Today the program has been expanded to include community gardening, rainwater collection and composting. For more information about these guidelines and the certification program please visit <http://www.azdhs.gov/preparedness/epidemiology-disease-control/food-safety-environmental-services/index.php#school-garden-program-home>.

In support of the ADHS School Garden Program, the University of Arizona College of Agriculture and Life Science's Cooperative Extension developed an online training course to help garden leaders address and successfully implement the School Gardens Guidelines to earn certification. For direct access to this online training visit <https://cals.arizona.edu/agliteracy/programs/school-garden-food-safety>

Produce Safety University is a jointly developed course by USDA's Food and Nutrition Service and USDA's Agricultural Marketing Service. This course was developed for food service professionals interested in or already engaged in farm to school program development. Topics addressed in this course include:

- Understanding Good Agricultural Practices (GAPs) and Good Handling Practices (GHPs).
- Writing specifications for fresh and fresh-cut produce.
- Assessing produce upon receipt to ensure that it meets bid specifications.
- Storing fresh produce properly.
- Handling fresh produce during food preparation and service.

Additional resources for safe food handling of various produce items and information on this course can be found at <http://www.fns.usda.gov/food-safety/produce-safety-university>.



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To assist school food authorities (SFA) in incorporating the ADHS guidelines, the Arizona Department of Education (ADE or Department) offers training and technical assistance to schools interested in school garden development. The following are clarifying questions and answers, typically asked to the Department.

Q1: Why is food safety important to consider when gardening with children?

A1: Young children, the elderly and those with compromised or otherwise underdeveloped immune systems, are considered a vulnerable population. These populations are more susceptible to food borne illnesses caused from contaminated foods. Applying best practices in school gardening is essential in preventing food borne illnesses in schools.

Q2: Who is the “local health authority” for food safety in school gardens?

A2: According to the Arizona Food Code, the local health authority is defined by the ADHS as the county environmental health department. Please contact your local health department for additional guidance.

Q3: Are the ADHS guidelines mandatory for garden produce consumption?

A3: No, these are guidelines based on the USDA Good Agriculture Practice and Good Handling Practice Food Safety (GAP/GHP) Certification, which is intended for fruit and vegetable producers. It is the responsibility of the school food authority to ensure that when produce is used in the school kitchen food handlers follow county regulations and policies regarding safe handling of these products.

For questions about school gardens or produce food safety, please contact Arizona Farm to School Program under the Health and Nutrition Services Division at ArizonaFarmtoSchool@azed.gov or (602) 542-8700.



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The Following Environmental County Health Offices of Arizona have reviewed the contents of this memorandum and would like to be a resource to schools interested in Garden to Café Programming:

Chris Sexton

Environmental Services Department
Apache County Environmental Services Department
(928) 337-7532

Mike McGee

Environmental Services Department
Cochise County Environmental Services Department
(520) 432-9400

Randy Phillips

Environmental Services Department
Coconino County Environmental Services Department
(928) 679-8758

Michael O'Driscoll

Environmental Services Department
Gila County Environmental Services Department
(928) 402-8767

Gavin Lawson

Environmental Services Department
Graham County Environmental Services Department
(928) 428-1962

Joe Klein

Environmental Services Department
Greenlee County Environmental Services Department
(928) 865-2601

Joyce McCluskey

Environmental Services Department
La Paz County Environmental Services Department
(928) 669-1100

Jaime Vinaras

Environmental Services Department
Maricopa County Environmental Services Department
(480) 483-4703, ext. #201

Becky Bramlett

Environmental Services Department
Mohave County Environmental Services Department
(928) 757-0901

Jeff Nafziger

Environmental Services Department
Navajo County Environmental Services Department
(928) 524-4750

David Ludwig

Environmental Services Department
Pima County Environmental Services Department
(520) 724-7734

Front Desk

Environmental Services Department
Pinal County Environmental Services Department
(866) 287-0209

Jose Arriola

Environmental Services Department
Santa Cruz County Environmental Services Department
(520) 375-7622

Cecil Newell

Environmental Services Department
Yavapai County Environmental Services Department
(928) 442-5492

Monty Stansbury

Environmental Services Department
Yuma County Environmental Services Department
(928) 317-4636



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