United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA
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DATE: April 26, 2013

MEMO CODE: SP 37- 2013

SUBJECT: Enhancing the School Food Safety Program Frequently Asked Questions (FAQ)

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum and its attachment supersede SP-37-2011, *Child Nutrition 2010: Enhancing the School Food Safety Program.* Attached are Questions and Answers (QAs) regarding the school food safety requirements for schools participating in Food and Nutrition Service (FNS) Child Nutrition Programs. The QAs provide additional clarification regarding the enhancements to the school food safety program.

The Healthy, Hunger-Free Kids Act of 2010 (the Act), Public Law 111-296, strengthens the existing food safety requirements in the National School Lunch Program (NSLP), School Breakfast Program (SBP) and all other Food and Nutrition Service (FNS) programs operated in a school. The purpose of this memorandum is to provide guidance on the implementation of the statutory requirement.

Section 302 of the Act amends section 9(h)(5) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1758(h)(5)) by requiring that the school food safety program based on Hazard Analysis and Critical Control Point (HACCP) principles be applied to any facility or part of a facility in which food is stored, prepared or served for the purposes of the NSLP, SBP or other FNS program. The school food safety program, required since 2004, addresses food safety in all aspects of school meal preparation, ranging from procurement through service. FNS anticipates that only minor modifications to existing food safety programs will be needed in order to meet this requirement.

Food safety programs must be reviewed to ensure that standard operating procedures for safe food handling are updated to include any facility or part of a facility where food is stored, prepared, or served, such as on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria. This requirement applies to school breakfast or lunch meals, and Special Milk, the Fresh Fruit and Vegetable Program and afterschool snack or supper programs.

Proper implementation of this requirement should not be burdensome because current procedures for food served in the cafeteria can be applied. FNS will continue to review and develop as needed practical food safety guidance to help State and local operators achieve the goals of this legislation.

State agencies are reminded to distribute this memo and attachment to their program operators immediately. School Food Authorities should contact their State agencies for additional information. State agencies may direct any questions concerning this guidance to the appropriate Food and Nutrition Service Regional Office.

Melissa A. Rothstein

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Attachment

Enhancing the School Food Safety Program

Frequently Asked Questions (FAQ)

In 2005 FNS published, *Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles.* This guidance identifies the minimum elements that must be included in a school food safety program based on HACCP principles and provides sample Standard Operating Procedures (SOPs) and documentation forms. The principles in the guidance still are in effect and apply to the new requirements that extend the school food safety program to the storage, preparation, or service of foods in locations outside of the school cafeteria. You can download the guidance document at: http://www.fns.usda.gov/fns/safety/pdf/HACCPGuidance.pdf

The source of information for the questions below is the 2009 FDA Food Code. Always follow your State and local food safety regulations because they may differ from the 2009 FDA Food Code.

1. **Which FNS Child Nutrition Programs are included in the expanded HHFKA food safety requirement?**

   The following FNS Child Nutrition Programs are included in the expanded HHFKA food safety requirement:
   - National School Lunch Program (including Seamless Summer Option)
   - School Breakfast Program
   - Fresh Fruit and Vegetable Program
   - NSLP Afterschool Snack Program
   - Special Milk Program operated by schools
   - Summer Food Service Program operated by schools
   - Child and Adult Care Food Program operated by schools

   The new requirement does not apply to food sold or served in schools that is not part of an FNS Child Nutrition Program, such as food served at sporting events.

2. **Which locations are affected by the new requirement?**

   The new requirement applies to all locations outside of the cafeteria where program meals or snacks are prepared or served as part of the FNS Child Nutrition programs noted in question #1. These locations may include but are not limited to classrooms, school buses, school courtyards, kiosks, vending machines used to dispense reimbursable meals, or field trip sites.

   Also included in this new requirement are warehouses that store foods for FNS Child Nutrition Programs and are under the control of the SFA. The National Food Service Management Institute (NFSMI) developed sample SOPs that relate to warehouse activities:
   - Receiving Deliveries: http://sop.nfsmi.org/HACCPBasedSOPs/ReceivingDeliveries.pdf

- Preventing Cross-Contamination during Storage and Preparation: http://sop.nfsmi.org/HACCPBasedSOPs/PreventingCrossContaminationDuringStorageandPrep.pdf
- Transporting Food to Remote Sites: http://sop.nfsmi.org/HACCPBasedSOPs/TransportingFoodtoRemoteSites.pdf
- Holding Hot and Cold Potentially Hazardous Foods: http://sop.nfsmi.org/HACCPBasedSOPs/HoldingHotandColdPHF.pdf
- Cleaning and Sanitizing Food Contact Surfaces: http://sop.nfsmi.org/HACCPBasedSOPs/CleaningandSanitizingFoodContactSurfaces.pdf

3. Does the existing school food safety plan need to be modified?

To determine whether the existing school food safety plan is adequate you should ask whether it addresses the following questions:

- Does it include all of the programs listed above that are operated in your school?
- Does it include the locations where FNS Child Nutrition Program food is stored, prepared, or served outside of the cafeteria?

If you have not included all of the FNS Child Nutrition Programs that your school operates, or the locations where food is stored, prepared, or served as part of those programs, you will need to modify your plan to address food safety concerns in those areas.

4. What food safety practices are recommended when food is served outside of the cafeteria?

If you serve similar food items, both in the cafeteria and at other school locations, you may be able to extend your plan to these additional service sites with minimal modification of your plan. Many of the recommended food safety practices for service in the cafeteria also apply to food served in classrooms or other places. The following food safety practices are recommended:

- Maintain time and temperature control. Remember that potentially hazardous foods must be kept out of the temperature danger zone. Cold foods must be held at an internal temperature of 41°F or below. Hot foods must be held at an internal temperature of 135°F or above.
- Prevent cross contamination. For example, use serving utensils, or single-use disposable gloves when serving students; or portion and wrap items before service.
- Clean and sanitize food contact surfaces, including desks and tables in classrooms. Refer to NFSMI's sample SOPs for more information on cleaning and sanitizing food contact surfaces: http://sop.nfsmi.org/HACCPBasedSOPs/CleaningandSanitizingFoodContactSurfaces.pdf
- Encourage school volunteers, and students to wash their hands before and after service. For recommended hand washing procedures, refer to question 8.

- Monitor food storage conditions, such as temperature, cleanliness, etc., if food is stored in locations outside of the kitchen or cafeteria.
- Avoid potential pest problems by removing all leftover food and food waste from classrooms, or other locations, immediately after service.

5. **How can food safety be managed when food is served by school staff other than foodservice employees, such as teachers, classroom aides, or volunteers?**

   The following items are examples of strategies that you can use to manage food safety when food is served by other school staff or volunteers:
   - Select single-serve items that have been portioned and wrapped and can be served easily in a classroom, or another location.
   - Use equipment that will maintain safe temperatures when transporting potentially hazardous hot or cold foods. For example, use coolers with ice packs to keep cold foods at 41°F or below.
   - Check the ambient temperature of holding equipment and the internal temperature of potentially hazardous food before delivery to classrooms, or other locations. For more information, refer to NFSMI's SOP on hot and cold holding of potentially hazardous foods: http://sop.nfsmi.org/HACCPBasedSOPs/HoldingHotandColdPHF.pdf
   - Advise school staff and volunteers to wash their hands properly before handling or serving food. For recommended hand washing procedures, refer to question 8.
   - Provide serving utensils, or single-use disposable gloves.
   - Minimize the amount of time that food is held in classrooms, or other locations. For example, drop food off as close to service time as possible and pick food up immediately after service.
   - Provide basic food safety training in-house, or in conjunction with others, such as your local health department, or Cooperative Extension staff.

6. **Can leftover food be saved and served again?**

   Determining whether leftovers may be served again involves many factors. Contact your local health department to discuss whether, and how, to handle leftovers.

   The following suggestions may help you limit the amount of leftovers:
   - Forecast the amount of food that you will need. Accurate planning will help minimize leftovers and manage food waste.
   - Consider food quality when determining whether a leftover food item should be saved. Some food items may not be appealing when served again.

7. **What food safety requirements should be followed when donating food from FNS Child Nutrition Programs?**

FNS Child Nutrition Programs may donate food to any food banks or charitable organizations that are considered tax-exempt under section 501(c) (3) of the Internal Revenue Code. Refer to the FNS guidance on this topic for more information: www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP11_CACFP05_SFSP07-2012os.pdf

Always follow State and local food safety regulations related to food donations.

8. Do students and staff need to wash their hands before serving or eating food in the classroom (or other serving site)?

The Centers for Disease Control and Prevention (CDC) recommends that everyone wash their hands before preparing or eating food to avoid food borne illness and spreading germs to others. Foodservice staff must follow all State and local food safety regulations when preparing or serving food, including those that address hand washing. When food is handled and served in the classroom, or other serving sites, teachers, students, other school staff, and volunteers also may handle food and should have clean hands.

CDC recommends the following procedures for proper hand washing:

- Wash hands with soap and water, if available.
- Wet hands with clean, running water (warm or cold) and apply soap.
- Rub your hands together to make a lather and scrub them well; be sure to scrub the backs of your hands, between your fingers, and under your nails.
- Continue rubbing your hands for at least 20 seconds. Need a timer? Hum the "Happy Birthday" song from beginning to end, twice.
- Rinse your hands well under running water.
- Dry your hands using a clean towel, or air-dry them.

According to CDC, an alcohol-based hand sanitizer that contains at least 60% alcohol is the best alternative when soap and water are not available. Alcohol-based sanitizer can reduce the number of germs on hands, but it does not eliminate all types of germs.

Source: www.cdc.gov/handwashing

9. Are resources available to support the implementation of this requirement?

Many of the standard operating procedures (SOPs) posted on the National Food Service Management Institute's website (http://sop.nfsmi.org/) will help you meet the requirement, and already may be in place in your operation. Related SOPs include:

1. Cleaning and Sanitizing Food Contact Surfaces
2. Holding Hot and Cold Potentially Hazardous Foods
3. Personal Hygiene
4. Preventing Contamination at Self-Service Bars
5. Serving Food

6. Transporting Food to Remote Sites (Satellite Kitchens)
7. Using and Calibrating Thermometers
8. Handling Ready-to-Eat Foods
9. Washing Fruits and Vegetables
10. Washing Hands

In addition, FNS has a resource for classroom teachers and aides who handle fresh produce in classrooms. It is available at:
http://nfsmi.org/documentlibraryfiles/PDF/20110822025614.pdf