



- ### School Food Safety - **Preparation**
- Primary responsibility of your Local Health Department through your food license.
 - Requirements of a School Food Safety Program
 - Tools Available
 - Certified Food Manager
 - Approved certifications
 - Who is responsible in the event of an outbreak?
 - MI Specific Clarifications
 - "Approved Source"

School Food Safety – Preparation
Requirements of a School Food Safety Program

The School Food Authority (SFA) is responsible for developing a comprehensive food safety program for their district, including a plan for every school food preparation and service site. A school food safety program must include the following elements:

- o Documented Standard Operating Procedures (SOPs)
- o Documenting menu items into one of three HACCP Process categories
- o Documenting Critical Control Points of food production
- o Monitoring
- o Establishing and documenting corrective actions
- o Recordkeeping
- o Reviewing and revising the overall food safety program

School Food Safety – Preparation
Requirements of a School Food Safety Program

- o *“Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles.”* USDA FNS June 2005 (79 pages)
 - o <http://www.nfsmi.org/documentlibraryfiles/PDF/20080220092722.pdf>
- o *“Template for Developing a School Food Safety Program”,* National Food Service Management Institute, 2006 (22 pages)
 - o <http://www.nfsmi.org/documentlibraryfiles/PDF/20080207023632.pdf>
- o *“HACCP Based Standard Operating Procedures,”* National Food Service Management Institute, 2005 (115 pages)
 - o <http://www.nfsmi.org/documentlibraryfiles/PDF/20080207024226.pdf>

School Food Safety – Preparation
Certified Food Manager

- o There are 3 nationally accredited exams used by course providers and approved by MDARD:
 - o [National Restaurant Association Educational Foundation](#) (ServSafe) 800-765-2122
 - o [National Registry of Food Safety Professionals](#) 800-446-0257
 - o [Thomson Prometric](#) 800-624-2736

School Food Safety – **Preparation** Certified Food Manager



http://michigan.gov/mdard/0,4610,7-125-50772_45851_45855-182605--,00.html

- Who is responsible in the event of an outbreak?

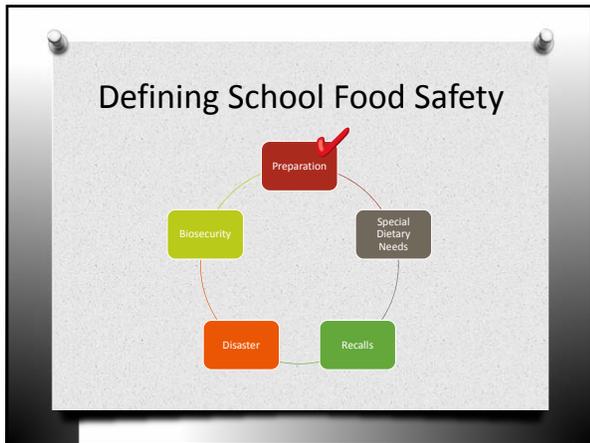
School Food Safety – **Preparation** MI Specific Clarifications

- ServSafe says: "Purchase only from an 'approved source'"
- What does this mean in MI?

School Food Safety – **Preparation** Defining "Approved Source"

- Checklists
 - Iowa State
 - Cornell
 - UC Davis
 - Penn State
- Initiates conversation





- ### School Food Safety – **Special Dietary Needs**
- Laws and Regulations
- Rehabilitation Act of 1973
 - Individuals with Disabilities Education Act (IDEA)
 - Americans with Disabilities Act (ADA)
 - U.S. Department of Agriculture's (USDA) nondiscrimination regulation (7 CFR 15b)
 - FNS Instruction 783-2, Revision 2, *Meal Substitutions for Medical or Other Special Dietary Reasons*

Disability

Anyone who has a physical or mental impairment, which substantially limits one or more of the major life activities, has a record of such impairment, or is regarded as having such an impairment.

<p>IDEA</p> <ul style="list-style-type: none"> o Disability o Special education needed o IEP completed o Accommodations made 	<p>Section 504</p> <ul style="list-style-type: none"> o Disability o Special education not needed o 504 plan completed o Accommodations made
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Challenge Activity

o The principal wants to provide children with disabilities a serving area separate from the one where other children are being served. Is it appropriate to do this? Why or why not?

Challenge Activity

o The school nurse comes to the cafeteria to tell you that there is a new student with an IEP that requires a full breakfast. Your school does not participate in the SBP. Do you have to provide the meal to this student? Why or why not?

USDA Regulations and Guidance

Child with disability must have a licensed physician's statement that includes:

- o the child's disability;
- o an explanation of why the disability restricts the child's diet;
- o the major life activity affected by the disability;
- o the food or foods to be omitted from the child's diet, and the food or choice of foods that must be substituted.

Challenge Activity

- o If the licensed physician's orders are to provide portion sizes twice the amount served to other children, do you have to provide the additional quantities? Why or why not?

Challenge Activity

- o As part of the therapy for a child with a disability, the licensed physician has required the child to consume six cans of cranberry juice a day. The juice is to be served at regular intervals, and some of these servings would occur outside of the normal school meal periods. Is the school food service required to provide all of the servings of juice?

Challenge Activity

o A student was in a serious accident and had to have his jaw wired shut for one month, which limits his ability to eat solid food. The doctor provides a statement of the disability that requires meals to be substituted with a specially purchased high calorie drink supplement. Are you required to accommodate this disability? Why or why not?

USDA Regulations and Guidance

Child with medical conditions that are NOT disabilities must have a medical statement that includes:

- an identification of the medical or other special dietary condition which restricts the child's diet;
- the food or foods to be omitted from the child's diet; and the food or choice of foods to be substituted.

Challenge Activity

o A child has a life threatening allergy which causes an anaphylactic reaction to peanuts. The slightest contact with peanuts or peanut derivatives, usually peanut oil, could be fatal. To what lengths must the food service go to accommodate the child? Is it sufficient for the school food service to merely avoid obvious foods, such as peanut butter, or must school food service staff research every ingredient and additive in processed foods or regularly post all of the ingredients used in recipes?

Challenge Activity

- A high school student approaches you and asks if he can have a special meal since he has high cholesterol. Are you obligated to fulfill this special dietary need? Why or why not?

Accommodations

- Use food already purchased when possible
- May require special training
- May require professional help of a dietitian
- State agencies may be of assistance

Challenge Activity

- Do you have to provide a modified meal to a child whose parents are strict vegetarians and want their child to be provided with vegetarian meals because they believe it is healthier than eating meat? Why or why not?

Food Service Staff

- Keep confidentiality
- Provide substitutions and modifications
- Exercise care
- Document
- Do not overcharge
- Be consistent

Challenge Activity

- When a student has a non-disabling milk allergy (such as an intolerance or aversion), can juice or water be substituted for the milk?

Challenge Activity

- A child with a disability has a licensed physician's statement, which includes a menu with specific foods. One day, while making up the menu for this child, you realize that one of the food items on the special menu is out of stock. You have something similar on hand. Is it OK to make this substitution? Why or why not?

Challenge Activity

o You receive a medical statement from a physician concerning a child with a disability but it does not specify food substitutions. You have another child with the same disability for whom you already prepare special meals. Can you use the same meal for this new child? Why or why not?

Challenge Activity

o A school district has contracted with a FSMC to operate the school's food service. Is the FSMC obligated to accommodate children with disabilities?

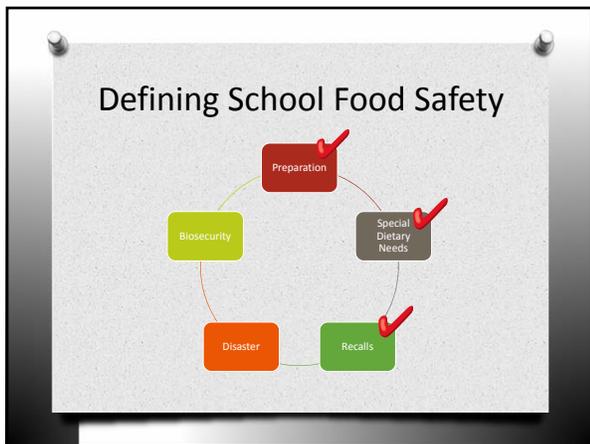
Challenge Activity

o Some schools purchase items from nationally recognized fast-food chains and sell these items on an "a la carte" basis. These items are frequently sold in a setting such as a kiosk which uses the chain's logo or otherwise advertises the product. What obligation, if any, does the fast-food chain have to provide alternative meals?



School Food Safety - **Recalls**

- o Important note: MI does not have a mandatory recall authority; Recalls are typically voluntary by company
- o USDA Foods through MDE
 - o learns of recall via phone, fax, e-mail from the USDA's Rapid Alert System (RAS), food manufacturer, and/or the USDA's Web Based Supply Chain Management System (WBSCM)
 - o Works with purchasing consortia's to locate recalled product and to notify schools who may have received product
 - o may also utilize MEGS+ info to notify schools/agencies of any recalls pertaining to USDA Foods
- o Commercial Product
 - o MDARD works with companies to encourage them to do the right thing
 - o learns about recalls through: internal staff, FDA, USDA, Industry notifications, other state agencies, media
 - o then communicates through MDARD listserv, text alerts, Twitter, and Facebook accounts

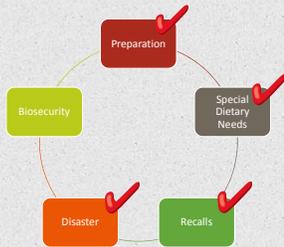


School Food Safety - Disaster

- Definition: Knowing what to do before, during and after an emergency as a critical part of being prepared
- Not Mandatory, highly encouraged
- Consider:
 - Preparation
 - Adequate food, water and other basic supplies
 - Adequate food, water and other basic supplies
 - Allergies

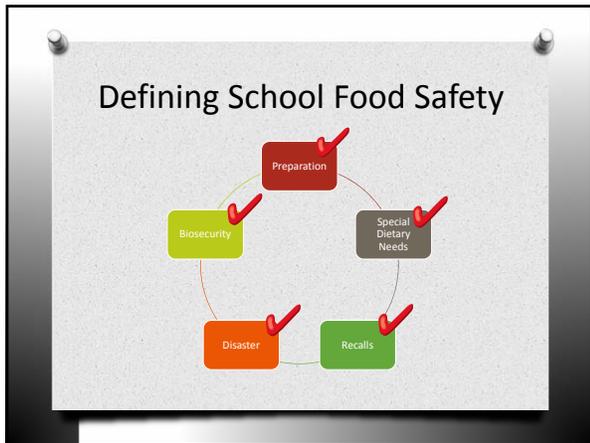
◦ <http://www2.ed.gov/admins/lead/safety/emergencyplan/index.html>

Defining School Food Safety



School Food Safety - Biosecurity

- Definition: protecting the health of the children and adults in your school by strengthening the safety of your foodservice operation
- Not mandatory, highly encouraged
- Develop a team
- create a food biosecurity management plan
 - <http://foodbiosecurity.nfsmi.org/index.php>
- NSFMI has a table top exercise program available & funding to assist districts in conducting. Contact Aleshia Hall-Campbell at ahall2@olemiss.edu or (800) 321-3054 for more information.



- ### Additional Training Materials Available
- o NFSMI: <http://www.nfsmi.org/>
 - o Produce Safety University
 - o Categorizing Menu Items According to Process Approach
 - o USDA Food Safety Education
 - o http://www.fsis.usda.gov/food_safety_education/food_safety_education_programs/index.asp
 - o Partnership for Food Safety Education
 - o <http://www.fightbac.org/>



<http://www.nfsmi.org/resource/overview.aspx?ID=452>

NEW CDC Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs

<http://www.cdc.gov/healthyyouth/foodallergies/>

http://www.fns.usda.gov/fns/safety/pdf/best_practices.pdf

BEST PRACTICES
HANDLING FRESH PRODUCE IN SCHOOLS



What's in the Administrative Review re: Food Safety?

- o MI SNP Analysts are not licensed health inspectors
- o Required to monitor the following for compliance:
 - o Written food safety plan for compliance with HACCP program criteria
 - o Determine if 2 food safety inspections have been obtained
 - o Confirm the posting of the most recent food safety inspection report
 - o Verify compliance with HACCP and local/state health standards
 - o Check temperature logs to ensure proper record keeping
 - o Examine on-site food storage for dates and conditions of foods
 - o Examine the procedures in place for accommodating students with special dietary needs

Monitor: Written food safety plan

- o The written food safety plan will be examined for the required elements
 - o Follows process approach & HACCP principles
 - o Covers all facilities that store, prepare or serve food for FNS programs
 - o Accessible at, and appropriate to, each site
 - o On-site observation of food safety plan implementation
 - o Is cross contamination prevented, are temperatures monitored, are staff knowledgeable of the plan, etc.

Monitor:
Food safety inspections

- o Each participating school must receive at least two food safety inspections each school year
- o Performed by local health department
 - o 2 inspection dates are noted during review
- o If LHD denies an inspection, documentation of denial is maintained
- o Most recent results are posted in a publicly visible location

Monitor:
Recordkeeping & Storage

- o FNS requires each school in the SFA maintain temperature logs for a period of six months
- o During the on-site visit, the SNP Analyst is required to review the temperature logs for one day within the past 6 months
- o MDE is required to ensure that facilities for handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage and other loss

Monitor:
Special dietary needs

- o FNS requires each SFA to be knowledgeable of the requirements for students with special dietary needs
- o SNP Analysts will assess your understanding of these requirements

Local Wellness Policy (LWP)

- 2005-2006 Local Wellness Policy Administrative Policy #3
- Child Nutrition Reauthorization 2010: Local Wellness Policies
- USDA Local Wellness Policy – <http://www.fns.usda.gov/tn/healthy/wellnesspolicy.html>
- MDE SBE Model Local Wellness Policy - http://www.michigan.gov/documents/Policy_on_Wellness_141434_7.pdf

Local School Wellness Policies in Administrative Review

- All SFAs MUST have a LWP that includes:
 - Goals for nutrition education, physical activity, nutrition promotion, and other school-based activities to promote student wellness
 - Steps for implementation, transparency, public input, availability

Questions

- Contact MDE School Nutrition Programs
 - Phone: 517-373-3347
 - or
 - E-mail: MDE-SchoolNutrition@michigan.gov