United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA
22302-1500

DATE: December 16, 2004

SUBJECT: School Food Safety Inspections – Reauthorization 2004: Implementation Memo – SP 10

TO: Special Nutrition Programs
All Regions

State Agencies
Child Nutrition Programs
All States

Section 111 of the Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265) amended section 9(h) of the Richard B. Russell National School Lunch Act regarding food safety inspections required in schools participating in the National School Lunch or School Breakfast Programs.

Previously, participating schools were required to obtain a minimum of one food safety inspection per school year or comply with the frequency required by local standards. Beginning July 1, 2005 each school must now obtain at least two food safety inspections each school year. The inspections must be conducted by a State or local governmental agency responsible for food safety inspections. More frequent inspections may still be required by State or local governments. In addition, schools must post, in a publicly visible location, a report on the most recent food safety inspection, and provide a copy of the food safety inspection report to a member of the public upon request.

The Reauthorization Act also requires State agencies to annually submit a report on food safety inspections to the Secretary. To meet this requirement, we are planning to require State agencies to annually collect and submit to FNS the number of schools within their State that meet the requirement for two food safety inspections; the number of schools that have only obtained one inspection; the number of schools that have not been able to obtain any inspections; and the number of schools that exceed the required number of inspections. The required reporting elements are subject to change as they move through the clearance process. We hope to have them finalized in advance of July 1, 2005, and envision the first report will be due at the end of calendar year 2006.

State agencies should inform their school food authorities of the new requirements for food safety inspections as soon as possible. In addition, we encourage State agencies to contact their State and/or local agencies responsible for food safety inspections to help facilitate schools' compliance with the new requirements. At the Federal level, FNS will be sending letters to the associations representing State and local food safety

regulators and inspectors to inform them about the new requirement and to seek their cooperation.

Please contact Marisol Benesch, School Programs Section, if you have any questions on the food safety inspection provision. You may reach her via e-mail, marisol.benesch@fns.usda.gov, or by phone at 703-305-2971.

STANLEY C. GARNETT
Director
Child Nutrition Division

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA 22302-1500

MEMO CODE: SP 05-2008

DATE: 12-19-2007

SUBJECT: Food Safety Inspections in Non-Traditional School Settings

TO: Special Nutrition Programs
All Regions

State Agencies
Child Nutrition Programs
All States

We have been asked to clarify how the food safety inspection requirement is to be carried out by program operators on military bases, Indian reservations and Residential Child Care Institutions (RCCIs). Questions have risen because some of these program operators are not within the jurisdiction of a State/local public health agency responsible for food safety inspections, only serve vended meals, or prepare and serve family-style meals.

All institutions participating in the National School Lunch Program (NSLP) or School Breakfast Program are required to obtain two food safety inspections per school year. Program operators in non-traditional settings are expected to do their best to fulfill their responsibility:

- Department of Defense (DoD) schools, whether in the United States or overseas, must request two food safety inspections from the military personnel in charge of the food safety function for the base, for example the military health agency.

- Non-DoD schools located on domestic military bases must request the inspections from the State/local public health agency responsible for inspections.

- Schools operated by the Bureau of Indian Affairs (BIA) must obtain two food safety inspections from the Indian Health Service (IHS). The IHS inspections fulfill the NSLP requirement and BIA schools do not have to request a State/local public health agency to conduct the inspections.

- RCCIs must obtain two food safety inspections from their State/local public health agency even if they only offer vended meals or if residents prepare and serve their own meals. The State/local public health agency has discretion to determine the extent of the food safety inspections. If the RCCI is part of another institution (e.g., a hospital), the inspections obtained by the larger facility count towards the NSLP requirement if the RCCI food preparation and/or service area is included in the regular inspection.

We ask the State Agencies (SAs) to continue working with the State and local public health agencies and school food authorities to promote compliance with the food safety inspection requirement. SAs may discuss unusual situations with the Regional Offices.

Thank you for your cooperation.

Original Signed

STANLEY C. GARNETT
Director
Child Nutrition Division

STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

JEREMY M. HUGHES, PH.D.
INTERIM SUPERINTENDENT
OF PUBLIC INSTRUCTION

FOOD SERVICE

ADMINISTRATIVE POLICY #11
SCHOOL YEAR 2004-2005

SUBJECT: School Meals Program
School Food Safety Inspections – Reauthorization 2004

DATE: March 18, 2005

Section 111 of the Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265) amended section 9(h) of the Richard B. Russell National School Lunch Act regarding food safety inspections required in schools participating in the National School Lunch or School Breakfast Programs.

Previously, participating schools were required to obtain a minimum of one food safety inspection per school year or comply with the frequency required by local standards. Beginning July, 1, 2005, each school must now obtain at least two food safety inspections each school year. The inspections must be conducted by a State or local governmental agency responsible for food safety inspections. In addition, schools must post, in a publicly visible location, a report on the most recent food safety inspection and provide a copy of the food safety inspection report to a member of the public upon request. The Reauthorization Act also requires State Agencies to annually audit the school food safety inspections and submit the results to the United States Department of Agriculture (USDA).

To help schools understand their obligations, as outlined by USDA, we are providing information about school, Michigan Department of Education and the local health department responsibilities.

School Responsibility

- Obtain two foodservice establishment inspections each school year.
- Post most recent food safety inspection report.
- Provide copies of food safety inspection reports to the public, as requested.
- Implement a Hazard Analysis and Critical Control Point (HACCP) plan (Administrative Policy #10, SY 2004-05).
- Comply with the Michigan Food Law 2000 and the 1999 Food Code.

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www.michigan.gov/mde • (517) 373-3324

MDE Responsibility

- Collect information about the food safety inspections and submit an annual report to USDA.

Local Health Department Responsibility under the Michigan Food Law 2000

- Conduct one inspection of each school foodservice establishment that operates nine months or less per year. The inspection must be conducted during the period of operation.
- Conduct one inspection every six months for those foodservice establishments that operate more than nine months per year.

The second inspection as required by the Child Nutrition and WIC Reauthorization Act of 2004 for school foodservice establishments that operate nine months or less per year is considered to be beyond the scope of the Food Law. A local health department is encouraged to conduct the second inspection, but is not obligated by law to do so. The second inspection may be conducted as a courtesy or under a contractual or other similar arrangement.

Under section 3119(4) of the Michigan Food Law 2000, schools are exempt from paying state and local fees. However, the additional inspection required for school foodservice establishments that operate nine months or less per year, as previously indicated, is considered to be beyond the scope of the Food Law and is therefore not exempt from local fees. A local health department, at its own discretion, may charge a fee for the extra non-regulatory inspection.

Please contact the School Meals Program at (517) 373-3347 if you have any questions regarding this memo.

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA
22302-1500

July 12, 2005

Subject: Food Safety Questions and Answers

To: State Directors
School Nutrition Programs
All States

Regional Directors
Special Nutrition Programs
All Regions

Enclosed for your information are questions and answers on the food safety provisions of the Child Nutrition and WIC Reauthorization Act of 2004 (P.L. 104-265). Please provide this information to your school food authorities. It will also be posted on the Food and Nutrition Service website at http://www.fns.usda.gov/cnd

As you know, we published an interim rule in the *Federal Register* on June 15, 2005, implementing the requirement that schools obtain two food safety inspections each school year. In addition, on June 10, 2005, we issued *Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles*. Hard copies of the HACCP guidance are being mailed to school food authorities. Both these documents are also on our web site.

STANLEY C. GARNETT
Director
Child Nutrition Division

Enclosure

I. Food Safety Inspections

1. Will USDA define what the food safety inspections must include? Will the food safety inspection cover the HACCP Plan that schools are required to have in place?

USDA does not have the authority to define the content of the food safety inspections. The State or local public health agency is responsible for the content of the food safety inspections. State or local authorities responsible for such inspections adopt standards, such as the *Food Code*, to guide their inspection process.

2. Is the expectation that school food authorities will solicit the health department to do the additional inspection, or will the State agency who oversees the local health departments inform the health departments that a second inspection is needed?

We encourage State agencies to contact their State and/or local agencies responsible for food safety inspections to help facilitate schools' compliance with the new requirements. At the Federal level, FNS has sent letters to the associations representing State and local food safety regulators and inspectors to inform them about the new requirements and to seek their cooperation. Ultimately, it is each school food authority's responsibility to obtain the required inspections.

3. Must the two inspections be done at school kitchens that are production facilities or at all schools, including satellite kitchens where foods are only served but not prepared?

Inspections must be conducted at any school that participates in the school lunch program or school breakfast program.

4. There is a new requirement for inspection reports. Who will do the inspection reports, the State Department of Education or State Department of Health? Does USDA have a required form for the report? Should schools report directly to FNS or to the State first?

State agencies that administer the school meal programs, most often the State Department of Education but sometimes the State Department of Agriculture, are required to monitor the number of inspections completed in each school food authority and report the data to USDA. Food safety regulators are not responsible for filing the reports with USDA. At present we are considering two options for State agencies to report the number of food safety inspections completed by schools under their jurisdiction. One option is to use an existing reporting form; the second option is to report the data electronically. At this time, USDA does not have a required form for the report. The first report will be due to USDA from States in November 2006.

5. Most schools have a good food safety record; why is it necessary to increase the number of food safety inspections? Shouldn't we make the requirement for inspections risk-based rather than simply setting a mandatory number per year?

There is increasing media and public interest in the safety of school meals. In response, Congress established this statutory requirement. USDA has no discretion to change it.

6. What are the ramifications of non-compliance with the inspection requirement?

We anticipate that State agencies that administer the school meal programs will work closely with schools that have difficulty meeting this requirement. In addition, we expect that State agencies will work with the food safety regulators to remove barriers that may hinder school compliance with the inspection requirement. Although there might be a transition period during which some schools develop mechanisms to obtain two inspections, we anticipate that schools and State agencies will do their best to meet program requirements.

7. Is the State agency required to monitor the results of the school food safety inspection?

States are not expected to monitor or track the results and required follow-up of every food safety inspection. However, during regularly scheduled monitoring visits, State agencies should assess whether school food authorities are meeting the food safety inspection requirements for all schools under their jurisdiction, and ensure that schools are taking corrective action based on findings in their inspections.

8. May schools do a self-inspection and comply with the law?

The National School Lunch Act requires that food safety inspections be conducted by the State or local governmental agency responsible for inspections.

9. Does the Local Education Agency (LEA) qualify as the State or local government agency responsible for food safety inspections?

No. The Reauthorization Act requires that the food safety inspections be conducted by the State or local governmental agency responsible for food safety inspections. "Local educational agency" has the meaning given the term in section 9101 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 7801).

10. May a school or school food authority with a strong HACCP plan obtain only one food safety inspection per year?

No. The law does not exempt schools or school food authorities with effective HACCP plans from complying with the food safety inspection requirement.

11. Are schools offering the Special Milk Program (SMP) required to have two food safety inspections annually?

No. The SMP is for institutions that do not participate in the school lunch or breakfast programs. Since the language in section 9(h) of the National School Lunch Act refers to schools participating in the school lunch or breakfast programs, SMP-only schools are not required to comply with this provision.

12. Must schools that contract with a Food Service Management Company (FSMC) to manage food service operations comply with the requirement of two food safety inspections per year?

Yes. A school that contracts with an FSMC retains control of the quality and general nature of the food service operation. A school that has entered into an agreement to participate in the NSLP or SBP must abide by all program requirements.

13. May a school count a food safety inspection conducted as part of the Summer Food Service Program or the Child and Adult Care Food Program as part of the two food safety inspections required per school year?

Yes, as long as the inspection covers the same preparation facilities and similar food services.

II. Hazard Analysis and Critical Control Point (HACCP) Requirement

14. Who must have a food safety program based on HACCP principles? Schools? Summer food service sites? Child care and adult care sites? Head Start sites?

Schools participating in the National School Lunch and/or School Breakfast Programs are required to implement a food safety program based on HACCP principles.

15. Why are HACCP-based programs being required for schools?

The Reauthorization Act requires that school food safety programs be based on HACCP principles. Food safety regulators view HACCP as a food safety management system that effectively prevents food safety hazards.

16. What are the elements of a school food safety program based on HACCP principles?

In accordance with USDA guidance issued June 10, 2005, a school food safety program must include the following elements: documented standard operating procedures and a written plan at each school food preparation and service site for applying HACCP principles. The written plan must include methods for documenting menu items in the appropriate HACCP process category; documenting critical control points of food production; monitoring; establishing and documenting corrective actions; record keeping; and reviewing and revising the overall food safety program.

17. Who is responsible for implementing the school food safety program based on HACCP principles in schools?

School food authorities must develop the food safety program for the food preparation and service sites under their jurisdiction. Food service managers/cafeteria managers at each school are responsible for implementation at their food service and preparation sites.

18. When must a HACCP program be implemented?

The food safety provisions of Reauthorization are effective July 1, 2005. Therefore, schools should be implementing their HACCP programs during School Year 2005-2006.

19. What if my district already has HACCP plans in place?

School food authorities that currently have food safety programs based on HACCP principles may retain their existing program after consultation with the State agency to ensure that they meet all requirements.

20. I use the USDA recipes which include HACCP Critical Control Points. Isn't that my HACCP plan?

No. Recipes that include critical control points are one valuable component of a food safety program. In accordance with USDA guidance issued June 10, 2005, a complete food safety program must also include documented standard operating procedures, documentation of menu items in the appropriate HACCP process category, monitoring, establishment and documentation of corrective actions, record keeping and review and revision of the program on a regular basis.

21. Must I use recipes that have HACCP Critical Control Points? Must I use standardized recipes as part of my HACCP plan?

There is no requirement to use recipes with critical control points identified. The USDA guidance issued on June 10, 2005, provides a method (the process approach) to identify critical control points. USDA does, however, encourage the use of standardized recipes as good management practice.

22. Where can I go for information? Who will provide training and technical assistance?

As with any program questions, you should go first to your State agency. Other resources and links can be found on the USDA Food and Nutrition Service web site at: www.fns.usda.gov/cnd . The National Food Service Management Institute (NFSMI) also provides training and technical assistance. For more information you can visit the NFSMI web site at: www.nfsmi.org or call the NFSMI Help Desk at: 800-321-3054.

23. What is the role of my health inspector? Will the food safety inspection cover our HACCP Plans?

Your health inspector continues in the role that he/she currently fills. He/she is the authority responsible for providing food safety inspections for your operation. The Reauthorization Act of 2004 does not require the inspectors to approve, evaluate, monitor or validate the HACCP Plans, though we anticipate that the food safety inspections already cover some HACCP-related elements.

24. Who will assure my compliance with the requirement? What happens if I don't meet the requirement?

State agencies that administer the school meal programs provide compliance assistance and ensure that school food authorities and program operators meet program requirements. Whenever there are compliance problems, State agencies will assess the need for technical assistance or other measures.

25. May food safety regulators provide HACCP training to schools?

Schools are free to determine the source of the training they receive. USDA issued guidance on June 10, 2005, listing the specific elements required in the HACCP programs that schools must develop. The school should ensure that training is consistent with USDA guidance. As an example, NFSMI is a reliable source for training and technical assistance to program operators.

26. Who will validate the HACCP plans developed by each school---the local health department or would an independent company be hired to do this validation procedure?

School food authorities must conduct periodic assessments of their food safety program based on HACCP principles to ensure that it is working according to the written plan. USDA does not require that school food authorities use State or local departments of health or hire independent organizations to validate the program. The State agency that administers the school meal programs is available to assist with implementation.

III. Funding

27. Is there any additional funding to cover the expenses involved with implementing either the inspection or HACCP requirements?

Schools may use the foodservice account to pay for costs related to the new food safety requirements. The increases in the fees related to the food safety inspections and other costs related to the HACCP requirement are legitimate costs of managing the school lunch program.

JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

MICHAEL P. FLANAGAN
SUPERINTENDENT OF
PUBLIC INSTRUCTION

TO: Local and Intermediate School District Superintendents, Public School Academy Directors, Non-Public School Administrators, and Residential Child Care Institutions

FROM: Carol Wolenberg, Deputy Superintendent

SUBJECT: School Food Safety Inspections

DATE: June 14, 2007

This correspondence is being sent to all districts to remind them of the change in required food safety inspections as stated in Section 111 of the Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265), amending section 9(h) of the Richard B. Russell National School Lunch Act, as stated in School Year 2004-05 Administrative Policy #11 School Food Safety Inspections – Reauthorization 2004, www.michigan.gov/documents/2004-05_Admin_120318_7._Policy_No._11.pdf. Two food safety inspections are required each school year at any school that participates in the National School Lunch Program (NSLP) or School Breakfast Program. Prior to Public Law 108-265, participating schools were required to obtain a minimum of one food safety inspection per school year.

In Michigan, under Michigan Food Law 2000 (Food Law), the county local health department (LHD) is responsible for conducting one inspection of each school site preparing or serving food that operates nine months or less per year. The second food safety inspection, as required by the Child Nutrition and WIC Reauthorization Act of 2004 for school sites that operate nine months or less per year, is considered to be beyond the scope of the Food Law. A LHD is encouraged to conduct the second inspection, but is not obligated by Michigan law to do so.

Under section 3119(4) of the Michigan Food Law 2000, schools are exempt from paying state and local fees. The additional inspection required, as indicated in paragraph one, is considered to be beyond the scope of the Food Law and is, therefore, not exempt from local fees. A LHD, at its own discretion, may charge a fee for the extra, non-regulatory inspection.

A district's obligation is to request the county LHD to perform a second inspection during the school year for all food preparation and serving sites. Some county LHDs are not doing second inspections upon request because of their budget constraints,

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www.michigan.gov/mde • (517) 373-3324

current levels of staffing, etc. Some county LHDs will perform second inspections for a fee (each county sets its own fee structure); some county LHDs are performing second inspections at no charge. If the county LHD declines to perform the second inspection upon request, ask the county to provide, in writing, the reason for declining to perform the second inspection and maintain this documentation in your files.

Schools participating in the NSLP are asked to list the dates of each food safety inspection obtained at each school building on their NSLP renewal via the Child Nutrition Application Program (CNAP). If two inspections are not obtained each school year for all sites, an explanation must be provided in the boxed area on the CNAP application.

Questions regarding the content of this memo may be directed to the School Nutrition Training and Programs Office at 517-373-3347.

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA 22302-1500

MEMO CODE: SP 05-2008

DATE: 12-19-2007

SUBJECT: Food Safety Inspections in Non-Traditional School Settings

TO: Special Nutrition Programs
All Regions

State Agencies
Child Nutrition Programs
All States

We have been asked to clarify how the food safety inspection requirement is to be carried out by program operators on military bases, Indian reservations and Residential Child Care Institutions (RCCIs). Questions have risen because some of these program operators are not within the jurisdiction of a State/local public health agency responsible for food safety inspections, only serve vended meals, or prepare and serve family-style meals.

All institutions participating in the National School Lunch Program (NSLP) or School Breakfast Program are required to obtain two food safety inspections per school year. Program operators in non-traditional settings are expected to do their best to fulfill their responsibility:

- Department of Defense (DoD) schools, whether in the United States or overseas, must request two food safety inspections from the military personnel in charge of the food safety function for the base, for example the military health agency.

- Non-DoD schools located on domestic military bases must request the inspections from the State/local public health agency responsible for inspections.

- Schools operated by the Bureau of Indian Affairs (BIA) must obtain two food safety inspections from the Indian Health Service (IHS). The IHS inspections fulfill the NSLP requirement and BIA schools do not have to request a State/local public health agency to conduct the inspections.

- RCCIs must obtain two food safety inspections from their State/local public health agency even if they only offer vended meals or if residents prepare and serve their own meals. The State/local public health agency has discretion to determine the extent of the food safety inspections. If the RCCI is part of another institution (e.g., a hospital), the inspections obtained by the larger facility count towards the NSLP requirement if the RCCI food preparation and/or service area is included in the regular inspection.

We ask the State Agencies (SAs) to continue working with the State and local public health agencies and school food authorities to promote compliance with the food safety inspection requirement. SAs may discuss unusual situations with the Regional Offices.

Thank you for your cooperation.

Original Signed

STANLEY C. GARNETT
Director
Child Nutrition Division

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA 22302-1500

MEMO CODE: SP 39-2008

DATE: September 19, 2008

SUBJECT: Responsibility to Request Food Safety Inspections

TO: Special Nutrition Programs
All Regions
State Agencies
Child Nutrition Programs
All States

A number of schools nationwide are still having difficulty obtaining the two food safety inspections required by the Child Nutrition and WIC Reauthorization Act of 2004. Although the Food and Nutrition Service (FNS) realizes that many of the difficulties schools face are beyond their control, we would like to stress that local program operators are responsible for requesting the food safety inspections from the public health department and documenting their efforts. Program reviews will examine a school's efforts to comply with this statutory requirement.

FNS encourages State Agencies to continue their dialogue with the state and local authorities responsible for food safety inspections. FNS will continue at the federal level to promote inter-agency cooperation to protect the safety of school meals served under the Child Nutrition Programs.

Thank you for your continued efforts to ensure compliance with this important provision of the National School Lunch Act.

Original Signed

CYNTHIA LONG
Director
Child Nutrition Division

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA 22302-1500

DATE: May 18, 2011

MEMO CODE: SP 37-2011

SUBJECT: Child Nutrition Reauthorization 2010: Enhancing the School Food Safety Program

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

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.

We envision that proper implementation of this requirement will not be burdensome because current procedures for food served in the cafeteria can be applied. Program operators should work to comply with this enhanced requirement as soon as possible, but not later than the beginning of School Year 2011-2012. FNS will develop practical food

safety guidance to help State and local operators achieve the goals of this legislation. State agencies should direct any questions concerning this guidance to the appropriate FNS Regional Office (RO). ROs with questions should contact the Child Nutrition Division.

Original Signed

Cynthia Long
Director
Child Nutrition Division

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA 22302-1500

DATE: August 3, 2011

MEMO CODE: SP 45 - 2011

SUBJECT: Food Safety Inspections in Service-Only Sites Participating in the School Meals Programs

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

The United States Government Accountability Office (GAO) issued a report (GAO-11-376) to the Ranking Member, Committee on Education and the Workforce, House of Representatives on the safety of food purchased by the Department of Agriculture (USDA) and served in the School Meal Programs. One of GAO's recommendations is that the Food and Nutrition Service (FNS) issue more specific guidance to States and school districts regarding the applicability of the food safety inspections requirement in schools that do not prepare food, such as those that only serve pre-packaged meals or meals delivered from a central preparation location (referred to in this memorandum as service-only sites). This memorandum serves that purpose.

As required by section 9(g) of the Richard B. Russell National School Lunch Act and Federal regulations at 7 CFR 210.13 and 7 CFR 220.7, all schools participating in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) must obtain two food safety inspections from the State or local governmental agency responsible for food safety inspections. This inspection requirement applies to all food preparation-service sites and service-only sites and State Agencies must report all sites in the annual report submitted to USDA. The scope of the food safety inspection may vary according to the type of food service operation and is determined by the agency responsible for inspections.

We are aware that the inspection agencies generally do not view schools as high-risk food service operations, and sometimes do not recognize service-only sites as food service establishments because they do not actually engage in meal preparation activities. However, this does not change the requirement for all institutions that meet the definition of "school" under the NSLP to obtain two inspections.

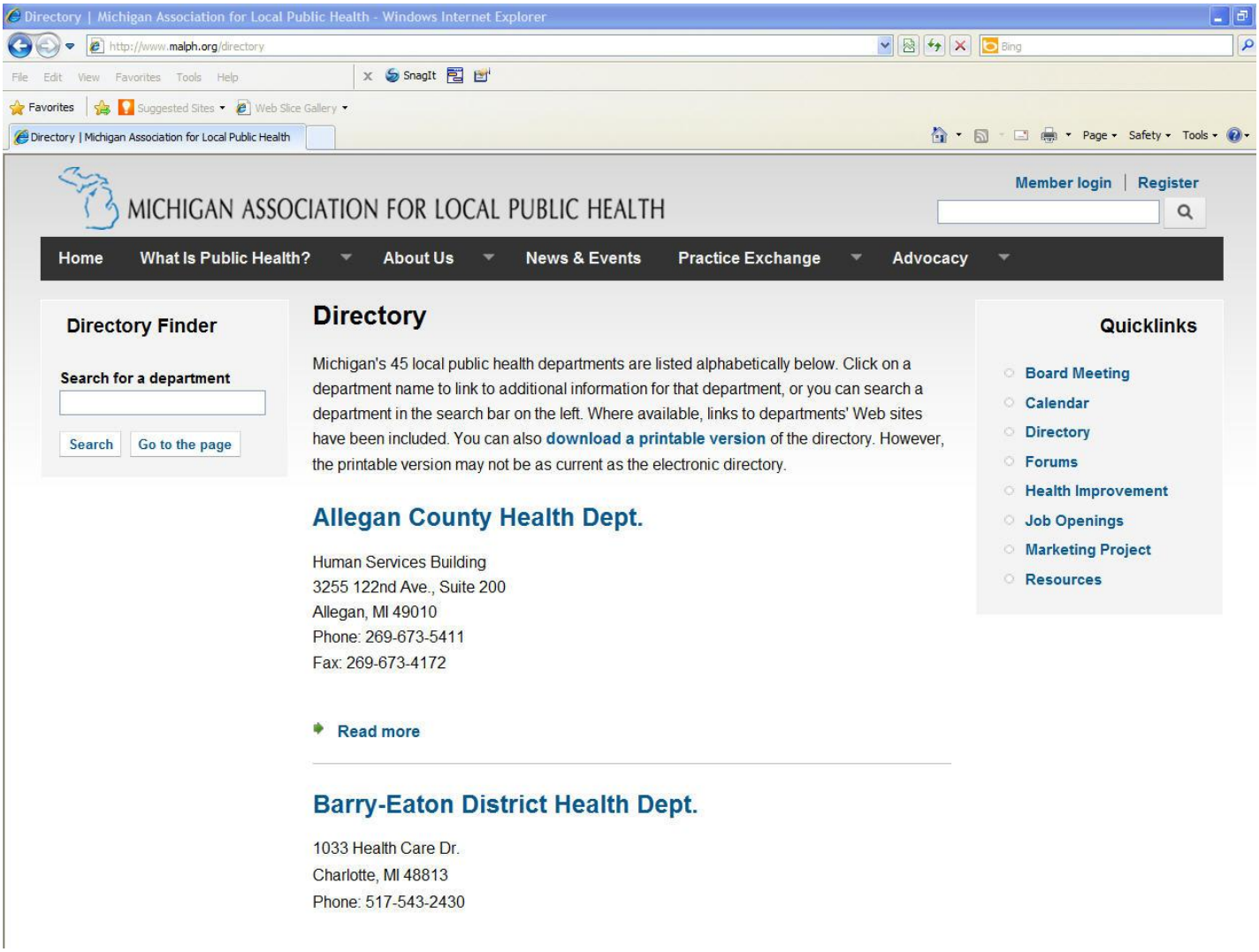
We are confident that compliance with the food safety inspection requirement will enable schools to strengthen the safety of all foods served through the NSLP and SBP. For more information about the report *School Meal Programs: More Systematic Development of*

Specifications Could Improve the Safety of Foods Purchased through USDA's Commodity Program, please visit http://www.gao.gov/Products/GAO-11-376.

State agencies should direct any questions concerning this memorandum to the appropriate FNS Regional Office (RO). ROs with questions should contact the Child Nutrition Division.

Original Signed

Cynthia Long
Director
Child Nutrition Division



MALPH Website: www.malph.org

Click on Directory to find contact information for all 45 of Michigan's Local Public Health Departments.

Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles

United States Department of Agriculture

Food and Nutrition Service

June 2005

https://cnp.alsde.edu/nslp/forms/

Table of Contents

Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles

I. Introduction

Section 111 of the Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265) amended section 9(h) of the Richard B. Russell National School Lunch Act by requiring school food authorities (SFAs) to implement a food safety program for the preparation and service of school meals served to children in the school year beginning July 1, 2005. The program must be based on Hazard Analysis and Critical Control Point (HACCP) principles and conform to guidance issued by the Department of Agriculture (USDA). All SFAs must have a fully implemented food safety program that complies with HACCP principles or with this optional guidance no later than the end of the 2005 – 2006 School Year.

This document serves as USDA guidance for the implementation of HACCP-based food safety programs in schools participating in the National School Lunch Program (NSLP) or the School Breakfast Program (SBP). This guidance identifies the minimum elements that must be included in a food safety program based on HACCP principles. SFAs may use this guidance to develop a food safety program that meets the needs of each food production and food service facility in their jurisdiction. SFAs that already have a HACCP-based food safety program in place may retain their current program if it includes all the HACCP principles listed in this guidance. This guidance, however, does not address school food safety inspections because they are a separate requirement.

HACCP is a systematic approach to construct a food safety program designed to reduce the risk of foodborne hazards by focusing on each step of the food preparation process--from receiving to service. More information regarding the traditional approach to HACCP may be found at http://www.fsis.usda.gov/OPHS/NACMCF/past/JFP0998.pdf. USDA recommends that SFAs use the Process Approach to HACCP because it gives them flexibility to create a program suitable for a variety of situations. The Process Approach, originally developed by the Food and Drug Administration for retail food establishments, categorizes food preparation into three broad categories based on how many times each menu item moves through the temperature danger zone. This guidance presents a modified version of the Process Approach to make it practical for school foodservice operations.

Serving safe food is a critical responsibility for school foodservice and a key aspect of a healthy school environment. Keeping foods safe is also a vital part of healthy eating and a recommendation of the *Dietary Guidelines for Americans 2005*. When properly implemented, HACCP-based food safety programs will help ensure the safety of the school meals served to children across the Nation.

II. Overview

The guidance in this document will help you develop a food safety program for your SFA. All SFAs/schools that participate in the National School Lunch Program and/or the School Breakfast Program must implement a food safety program, as described below.

Here is what you need to know to get started:
The SFA's overall food safety program must include a written plan for each individual school in the SFA and be based on Hazard Analysis and Critical Control Point (HACCP) principles. It is easier than it sounds because we have simplified the process and by following this guidance, your program will adhere to HACCP principles. To help you develop your program, we also have included a food manager's checklist and a sample food safety program as part of this guidance package.

Key points:
Three main points are essential to developing this program: sanitation, temperature control, and Standard Operating Procedures (SOPs).

1. Be sure that all of your food preparation areas are clean and sanitary, such as workers' hands, utensils, and food contact surfaces. Avoid cross contamination.
2. Temperature control means keeping cold foods cold and hot foods hot. Cook to proper temperatures and hold at proper temperatures, and be sure to record those temperatures. A basic, properly calibrated food thermometer (digital or dial) is all you need to check for proper temperatures.
3. SOPs can be used both for sanitation and to verify that proper temperatures are being observed, as well as other aspects of a foodservice operation.

New Terms:
You will learn some new terms in developing the food safety program and individual school plans. Words such as hazard analysis, control measures, critical control points, critical limits, Process Approach, and SOP are defined in the glossary at the back of the guidance and are discussed in the text. Here is a quick look at their definitions:

Hazard analysis: review of your food service operation to find areas where food safety problems might occur
Control measures: steps you take to reduce the likelihood of food contamination
Critical control points: points in food preparation and processing where controlling a step (such as cooking) is essential to assure food safety
Critical limits: the time and temperature ranges for food preparation and service (either cold or hot) that keep food safe
Process Approach: a method of grouping menu items into one of three processes depending on the number of times the food goes through the temperature "danger zone," which is between 41 ˚F and 135 ˚F (per the amendment to the 2001 FDA Food Code issued in August 2003)
Standard Operating Procedure (SOP): written instructions for a food service task that reduce food safety hazards

Here is what you need to do:
Look at your menu items and decide which food items are meant to be: 1) kept cold from preparation through service; 2) prepared hot and served the same day hot; and 3) prepared hot and served cooled, or possibly reheated. These are the preparation categories in the Process Approach to HACCP that are described in greater detail in the text. You will need to put each menu item (recipe) into one of those three categories and then keep it hot (or cold) while it is being stored, prepared, transported, held, and served.

Making it work:
If you see a failure in sanitation or temperature control, be sure to have a means of correcting the problem and verifying that the corrective steps resolved the problem. Once your food safety program is in operation, someone should be checking to see that it is working – perhaps once a month. Then, every year you should review the entire program to incorporate any changes, such as new menu items, new equipment, changes in staff, and remodeling.

Let's get started!

III. Purpose of a School Food Safety Program

The purpose of a school food safety program is to ensure the delivery of safe foods to children in the school meals programs by controlling hazards that may occur or be introduced into foods anywhere along the flow of the food from receiving to service (food flow). An effective food safety program will help control food safety hazards that might arise during all aspects of food service (receiving, storing, preparing, cooking, cooling, reheating, holding, assembling, packaging, transporting and serving).

There are two types of hazards: 1) ones specific to the preparation of the food, such as improper cooking for the specific type of food (beef, chicken, eggs, etc.) and 2) nonspecific ones that affect all foods, such as poor personal hygiene. Specific hazards are controlled by identifying Critical Control Points (CCPs) and implementing measures to control the occurrence or introduction of those hazards. Nonspecific hazards are controlled by developing and implementing SOPs.

A school food safety program should control both specific and nonspecific hazards and consist of SOPs and a written plan for applying the basic HACCP principles. This guidance presents HACCP principles adapted to help SFAs develop an overall school food safety program for their jurisdiction and HACCP-based food safety plans tailored specifically for each school foodservice site within their jurisdiction.

IV. Requirements of a School Food Safety Program

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

1. Documented SOPs

   SOPs are a very important factor in developing an effective food safety program. Their role is to serve as a basic food safety foundation and to control hazards not outlined specifically in the HACCP plan. For example, soiled and unsanitized surfaces of equipment and utensils should not come into contact with raw or cooked (ready-to-eat) food. Proper procedures to prevent this occurrence should be covered by an SOP.

2. A written plan at each school food preparation and service site for applying HACCP principles that includes methods for:
   - Documenting menu items in the appropriate HACCP process category
   - Documenting Critical Control Points of food production
   - Monitoring
   - Establishing and documenting corrective actions
   - Recordkeeping
   - Reviewing and revising the overall food safety program periodically

Each of these required elements is explained in more detail in Section V.

V. Developing a School Food Safety Program

Before developing your food safety program you should review the foodservice operations within your SFA and describe the facility, functions, and standard procedures for each. Some basic information to consider when doing this initial review includes:

- Types of facilities in your SFA
- Existing SOPs
- Number and type of employees at each site
- Types of equipment
- Processes for food preparation
- Menu items

After describing the operations in your jurisdiction, the following steps will help you develop your food safety program.

1. **Develop, document in writing, and implement SOPs.**
2. **Identify and document in writing all menu items according to the Process Approach to HACCP.**
3. **Identify and document control measures and critical limits.**
4. **Establish monitoring procedures.**
5. **Establish corrective actions.**
6. **Keep records.**
7. **Review and revise your overall food safety program periodically.**

Step 1: Develop, document, and implement SOPs.

SOPs lay a strong foundation for your overall school food safety program. SOPs are step-by-step written instructions for routine food service tasks that affect the safety of food ('nonspecific' hazards), such as proper dishwashing procedures, or for tasks that are a part of the HACCP-based plan (specific hazards), such as proper cooking procedures. Each SOP should include instructions on monitoring, documentation, corrective actions, and periodic review of the procedures they cover. Adherence to SOPs allows food service managers and employees to effectively control and prevent hazards.

SFAs may already have SOPs developed and in place. If not, USDA is developing a series of SOPs applicable to school food service establishments. The final versions of these SOPs will be posted on the National Food Service Management Institute's (NFSMI) website (www.nfsmi.org). NFSMI will also be conducting training sessions subsequent to the release of these documents on customizing these generic SOPs to fit your specific operations.

The main categories of SOPs with some example topics for school foodservice are listed below. See Appendix I for sample SOPs.

General safety considerations
- Prohibit bare hand contact with ready-to-eat (RTE) foods.
- Store chemicals away from food and food-related supplies.

Personnel
- Require hand washing after restroom use, sneezing, coughing, or after performing any cleaning activity.
- Develop a policy for restricting or excluding ill employees from food production or preparation areas.

Product procurement
- Follow recommendations for selecting vendors such as those found in State distributing agency vendor certification procedures.
- Develop buyer product specifications.

Receiving
- Reject all cans with swollen sides or ends, flawed seals and seams, rust or dents.
- Put perishable foods into the refrigerator or freezer immediately.

Storing
- Store all food and paper supplies 6 to 8 inches off the floor.
- Label all food with name of the school and delivery date.

Transporting
- Preheat transfer carts prior to use.
- Limit transport travel time to a maximum of 2 hours.

Holding
- Keep hot foods hot (above 135 ºF) and cold foods cold (below 41 ºF).

Preparation
- Do not keep food in the "danger zone" (between 41 ºF and 135 ºF) for more than 4 hours.
- Handle food with utensils; clean, gloved hands; or clean hands. (Bare hand contact with food during preparation should be limited. Bare hand contact with RTE foods should be prohibited.)

Cleaning/sanitizing
- Use clean water, free of grease and food particles.
- Keep wiping cloths in sanitizing solution while cleaning.

Cooking and documenting temperatures
- Record all temperatures when they are taken.
- Use only a clean and sanitized thermometer when taking internal temperatures of foods.

Cooling

- Cool rapidly by storing food in small batches in individual containers; cover loosely so that heat can escape quickly.
- Keep cold foods cold by pre-chilling ingredients for salads.

Reheating

- Transfer reheated food to hot-holding equipment only when the food reaches the proper temperature.
- Use only cooking ranges, ovens, steamers, and microwave ovens to reheat foods. Use hot-holding equipment only to maintain temperature and not for rapidly heating food.

Step 2: Identify and document in writing all menu items according to the Process Approach to HACCP.

The Process Approach to HACCP is a method of classifying food preparation into three broad categories. These categories are based on the number of times a menu item makes a complete trip through the temperature danger zone. The way food is prepared at each site determines into which of the three food preparation processes it will fall.

Temperature, if not controlled properly during food preparation and service, can contribute to a higher risk of foodborne illness. Therefore, it is critical to manage the temperature of food. In order to protect foods from potential hazards, it is important to keep hot foods hot and cold foods cold. It is most important to **keep food out of the temperature danger zone** (41ºF - 135º F).

The danger zone temperatures used in this guidance are from the *2001 FDA Food Code (as amended August 29, 2003 in the Supplement to the 2001 Food Code).* The temperatures in your State may be different so this guidance should be adapted as necessary to include State and local public health department code requirements and school food authority policies and procedures.

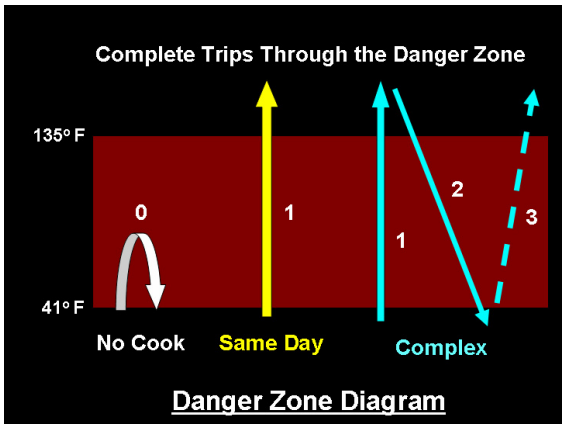
To assign menu items to one of the three processes, consider the processes and procedures used to prepare the food in each of your school district's facilities. Determine whether menu items have no cook step involved, undergo a cook step for same day service, or receive additional cooling and reheating following a cook step. This will enable you to place each menu item into the appropriate process. Identify the number of times each menu item goes up (heating) or comes down (cooling) through the **danger zone** (41ºF - 135º F) and classify items into the following food preparation processes:

Process #1 – No Cook
The menu item does not go completely through the danger zone in either direction.

Process #2 – Same Day Service

The menu item takes one complete trip through the danger zone (going up during cooking) and is served.

Process #3 – Complex Food Preparation
The menu item goes through both heating and cooling, taking two or more complete trips through the danger zone.



You should document the appropriate process for each menu item. This can be done in a variety of ways, including writing the process number directly on the recipe, or developing a list of menu items in each of the processes.

In some cases the menu item may not appear to fit into any of the processes. However, these types of items should still be handled and prepared properly. Salad bar items, such as fresh fruits and vegetables cut and ready-to-eat on a salad bar or served whole**,** should be treated as Process 1 items and kept cold. The goal is to control hazards associated with Process 1 and to prevent further contamination by ensuring good hygienic practices are followed by food employees. Keep in mind that for fresh fruits and vegetables, this includes no bare hand contact on ready-to-eat foods. SOPs to address fresh fruits and vegetables should be included in your food safety plan. Guidance on receiving, storage, and preparation of whole fruits and vegetables and salad bar items can be found in *Fruits & Vegetables Galore,* U.S. Department of Agriculture, Food and Nutrition Service, 2004. It can be accessed at http://www.fns.usda.gov/tn/Resources/fv_galore.html.

It is especially important to consider all the steps taken when a menu item is prepared at one site and served at another in order to be aware of potential hazards and control for them. A combination of central and satellite kitchens is found in many school districts. In these situations, the SFA must identify and categorize the appropriate overall food preparation process for menu items and also must develop a plan for each site involved in the preparation and service of the item to clarify the responsibilities for each site.

For example, a central kitchen cooks Broccoli, Cheese and Rice Casserole (a Process #2 menu item) and transports it hot to a satellite kitchen for service on the same day. The central kitchen has the responsibility for following the recipe and adhering to all applicable control points and SOPs. The satellite kitchen has the responsibility for the

control points specific to the site, for example checking the temperature of the food upon arrival and keeping the food at a safe temperature until service. Both must adhere to all applicable SOPs.

In addition to initial food preparation, some foodservice operations make use of leftovers. If your State or local authority has allowed for the use of leftovers, a procedure for handling leftovers should be implemented. Generally, leftovers will fall into Process #3 as they have most likely been cooked and cooled prior to being stored and used again. A sample of a procedure for handling leftovers can be found in Appendix II.

Step 3: Identify and document control measures and critical limits.

Control measures are any means taken to prevent, eliminate, or reduce hazards. Collectively, control measures include SOPs as well as the Critical Control Points (CCPs) and the corresponding critical limits established in each of the three processes.

Once you identify the appropriate process for each menu item, determine what control measures are needed to prevent the introduction of hazards at each stage of food preparation from receiving to service. Decide which of the control measures are absolutely essential to ensuring safe food.

<u>Identifying CCPs and Implementing Essential Control Measures in the Process Approach</u>
The control measures that are absolutely essential must be applied at key points, known as CCPs, during the food preparation process to control specific hazards (physical, chemical, or biological). A CCP is a key point where a step can be taken to prevent, eliminate, or reduce a food safety hazard to an acceptable level. Loss of control at this point may result in an unacceptable health risk. You will find that despite the different specific hazards, the control measures used to prevent, eliminate, or reduce hazards in all menu items under each of the three processes are similar.

The following are CCPs, related to each food preparation process:

For Process #1 – No Cook:

- Cold holding or limiting time in the danger zone to inhibit bacterial growth and toxin production (e.g., limiting time would be holding at room temperature for 4 hours and then discarding)

For Process #2 – Same Day Service:

- Cooking to destroy bacteria and other pathogens
- Hot holding or limiting time in the danger zone to prevent the outgrowth of spore-forming bacteria

For Process #3 – Complex Food Preparation:

- Cooking to destroy bacteria and other pathogens
- Cooling to prevent the outgrowth of spore-forming bacteria
- Hot and cold holding or limiting time in the danger zone to inhibit bacterial growth and toxin formation
- Reheating for hot holding, if applicable

CCPs and Corresponding Critical Limits

Each CCP includes boundaries that define safety. These boundaries or critical limits are the time and/or temperatures that must be achieved or maintained to control a food safety hazard. When critical limits are not met, the food may not be safe. The *2001 FDA Food Code (as amended August 29, 2003 in the Supplement to the 2001 Food Code)* provides critical limits designed to prevent, eliminate, or reduce hazards in food. For example, when cooking chicken, the *Food Cod*e sets the critical limit at 165 ºF for 15 seconds. Critical limits (time/temperature) are measurable and observable.

The following graphic demonstrates minimum temperatures and holding times (critical limits) for some common food service menu items.

Temperature Rules! Cooking for Food Service

Hold all hot food at 135 °F or above after cooking

USDA Meat and Poultry Hotline
1-888-MPHotline

FDA Food Information Line
1-888-SAFE FOOD

USDA

Food Safety and Inspection Service

U.S. Department of Agriculture

www.fsis.usda.gov/thermy

USDA is an equal opportunity employer and provider.

Fall 2004

Hold at specified temperature or above for 15 seconds unless otherwise stated

Minimum Temperatures and Holding Times

165 °F (15 seconds)
- Poultry—chicken, turkey, duck, goose—whole, parts or ground
- Soups, stews, stuffing, casseroles, mixed dishes
- Stuffed meat, poultry, fish and pasta
- Leftovers (to reheat)
- Food, covered, cooked in microwave oven (hold covered **2 minutes** after removal)

155 °F (15 seconds)
- Hamburger, meatloaf and other ground meats; ground fish*
- Fresh shell eggs—cooked and held for service (such as, scrambled)*

145 °F (15 seconds)
- Beef, corned beef, pork, ham—roasts (hold **4 minutes**)*
- Beef, lamb, veal, pork—steaks or chops
- Fish, shellfish
- Fresh shell eggs—broken, cooked and served immediately

140 °F (15 seconds)
- Ham, other roasts—processed, fully-cooked (to reheat)
- Fruits and vegetables that are cooked

*For alternative times and temperatures, see the **FDA Food Code 2001** **http://vm.cfsan.fda.gov/~dms/foodcode.html**

Documenting CCPs and Critical Limits:
You must document in writing the CCPs and critical limits for each Process Approach category in your food safety program and in each site plan. Each of the three processes in the Process Approach has specific CCPs, such as, cooking, cooling, hot holding, cold holding, and reheating. The CCPs for each of the processes will remain the same regardless of the menu item. However, the critical limits will vary depending upon the menu item and the recipe used to prepare each item. Critical limits for cooking, hot holding, and reheating are demonstrated by the Thermy graphic on page 15 of this guidance. Critical limits for cooling can be found in the Cooling Potentially Hazardous Foods SOP on page 33 of this guidance in Appendix I. The graphics on pages 20 – 22 of this guidance provide examples of menu items for each process with general control measures, CCPs, and critical limits. Also, see Appendix III for a sample school food safety program that includes documentation of control measures.

USDA's *Quantity Recipes for School Food Service* was recently revised to include CCPs and critical limits and is an excellent resource when preparing food by recipe. These recipes are available through the National Food Service Management Institute's website at http://www.nfsmi.org/Information/school_recipe_index_alpha.html. Having the recipes on file and following the recipes exactly will fulfill the requirement for documenting CCPs and critical limits within the Process Approach specifically for these recipes.

Although CCPs are identified in each of the USDA recipes, it is important for you to consider the complete process used at each school/site. Considering the complete process will help determine the need for CCPs when modifying recipes and in the absence of recipes. For instance, a particular school may cool leftover chicken, although cooling may not be identified as an operational step in the recipe. Therefore, a CCP must be determined and documented for the cooling step.

Using SOPs to Complement the Process Approach by Bridging Gaps
SOPs are also control measures and should not be forgotten when using the Process Approach. In addition to the established CCPs for each of the three processes, applicable SOPs should be followed for the preparation and service of all menu items. As mentioned earlier in this guidance, SOPs serve as general control measures for nonspecific hazards. Therefore, SOPs complement the Process Approach by providing a general safety net. Whereas, the CCPs determined for each of the three processes safeguard against specific hazards.

USDA is developing SOPs for use in the preparation of food in schools. These SOPs include critical limits, as well as monitoring, corrective action, verification, and recordkeeping procedures. The final versions will be posted on the NFSMI website. By accessing the NFSMI website (www.nfsmi.org), you will be able to customize these SOPs to best suit your particular operation.

Step 4: Establish monitoring procedures.

Monitoring is an important step for an effective food safety program. Control measures, including CCPs and SOPs, must be monitored, controlled, and documented in writing. Monitoring involves making direct observations or taking measurements to see that the food safety program is being followed. For example, the CCPs are managed by adhering to the established critical limits. Monitoring will identify when there is a loss of control so that corrective action can be taken.

In establishing your monitoring procedures, consider the following questions:

- How will you monitor CCPs and SOPs?
- When and how often will you monitor?
- Who will be responsible for monitoring?

What you are going to monitor depends on the critical limits associated with each CCP for a menu item. Final temperature and time measurements are very important, and you should determine how you will effectively monitor the critical limits for them.

Determining the appropriate means for monitoring is an important factor. If equipment is selected to monitor a specific CCP, you should ensure that it is accurate. The equipment you choose should also be appropriate for the monitoring function.

When deciding how often you will monitor, you should ensure that the monitoring interval will be reliable enough to ensure hazards are being controlled. Your procedure for monitoring should be simple and easy to follow.

Individuals chosen to be responsible for a monitoring activity may be a manager, line supervisor, or other reliable employee. Employees should be given the training and equipment necessary to properly perform the monitoring activities.

Monitoring examples:

The CCP for cold foods is cold holding. The critical limit is holding at 41 ºF or below. Therefore, the temperature of the refrigerator must be recorded on a refrigeration temperature monitoring chart at least three times daily to make sure the temperature is 41 ºF or below.

A CCP for chicken is cooking. The critical limit is cooking at 165 ºF for 15 seconds. Therefore, the internal temperature of the chicken must be monitored and recorded to make sure it is at or above 165 ºF for 15 seconds.

Step 5: Establish corrective actions.

Whenever a critical limit is not met, a corrective action must be carried out immediately. A corrective action may be simply continuing to heat food to the required temperature. Other corrective actions may be more complicated, such as rejecting food items that were not delivered at the right temperature, or discarding food that has been held without temperature control too long.

Your food safety program must include corrective actions. Employees must know what these corrective actions are, and be trained in making the right decisions. This preventive approach is the heart of HACCP. Problems will arise, but you need to find them and correct them before they cause illness or injury. It is also important to document corrective actions when they are taken.

Corrective action examples:

SOP:
If the temperature in the refrigerator is above 41 ºF, then the equipment must be checked to see if it is working properly. Also, the thermometer that is used to record the temperature must be calibrated regularly and checked to see if it is working properly.

CCP:
When cooking raw poultry, corrective action must be taken if the internal temperature does not reach 165 ºF for 15 seconds at the end of the designated cooking period. The corrective action would be to continue cooking the chicken until the internal temperature reaches 165 ºF for at least 15 seconds.

Corrective actions should be determined for all SOPs and CCPs. A list of appropriate corrective actions must be included in your school food safety program. See Appendices I and III for sample SOPs and a sample school food safety program. Both, the appendices and the sample program, include corrective actions.

Step 6: Keep records.

There are certain written records or kinds of documentation that are needed to verify that the food safety program is working. These records will normally involve the food safety plan and any monitoring, corrective action, or calibration records produced in the operation of the food safety program based on HACCP principles. Recordkeeping also provides a basis for periodic reviews of the overall food safety program. In the event your operation is implicated in a foodborne illness, documentation of activities related to monitoring and corrective actions can provide proof that reasonable care was exercised in the operation of your facility.

Maintain records of cooking, cooling, and reheating temperatures and other CCPs in the food preparation process. Keep documentation as simple as possible to make recordkeeping easy for employees. You do not necessarily need to develop new records. For example, you may use existing paperwork such as delivery invoices for documenting product temperature when receiving food items. Employees are an important source for developing simple and effective recordkeeping procedures.

Determine what records must be kept, where to keep them, and which staff member(s) will be responsible for maintaining them.

Some of the types of records that should be maintained include:

- Records documenting the SOPs
- Time and temperature monitoring records
- Corrective action records
- Verification or review records
- Calibration records
- Training logs
- Receiving logs

The clipboard icons in the following visual shows a recordkeeping duty for CCPs and SOPs for sample menu items in each of the processes. See Appendix IV for more recordkeeping examples.

Process 1: NO COOK

Example: Fruit Salad

RECEIVE
Control Measures: Known Source, Receiving Temperatures

STORE
Control Measures: Proper Storage Temperatures, Prevent Cross Contamination,
Store away from chemicals

PREPARE
Control Measures: Personal Hygiene, Restrict Ill Employees, Prevent Cross
Contamination

CCP: COLD HOLDING
Critical Limit: Hold at 41°F or Below.*
Check and record temperatures.

SERVE
Control Measures: No Bare Hand Contact with Ready to Eat Food, Personal
Hygiene, Restrict Ill Employees

Thermometer icon means that taking a temperature is necessary.

Clipboard icon means recording data is necessary.

*From the 2001 FDA Food Code (as amended August 29, 2993 in the Supplement to the 2001 Food Code).

Process 2: SAME DAY SERVICE

Example: Baked Chicken

RECEIVE
Control Measures: Known Source, Receiving Temperatures

STORE
Control Measures: Proper Storage Temperatures, Prevent Cross Contamination, Store away from chemicals

PREPARE
Control Measures: Personal Hygiene, Restrict Ill Employees, Prevent Cross Contamination

CCP: COOK
Critical Limit: Internal Temperature of 165°F for 15 seconds.*
Check and record temperatures.

CCP: HOT HOLD
Critical Limit: Hold at no less than 135°F.*
Check and record temperatures.

SERVE
Control Measures: No Bare Hand Contact with Ready to Eat Food, Personal Hygiene, Restrict Ill Employees

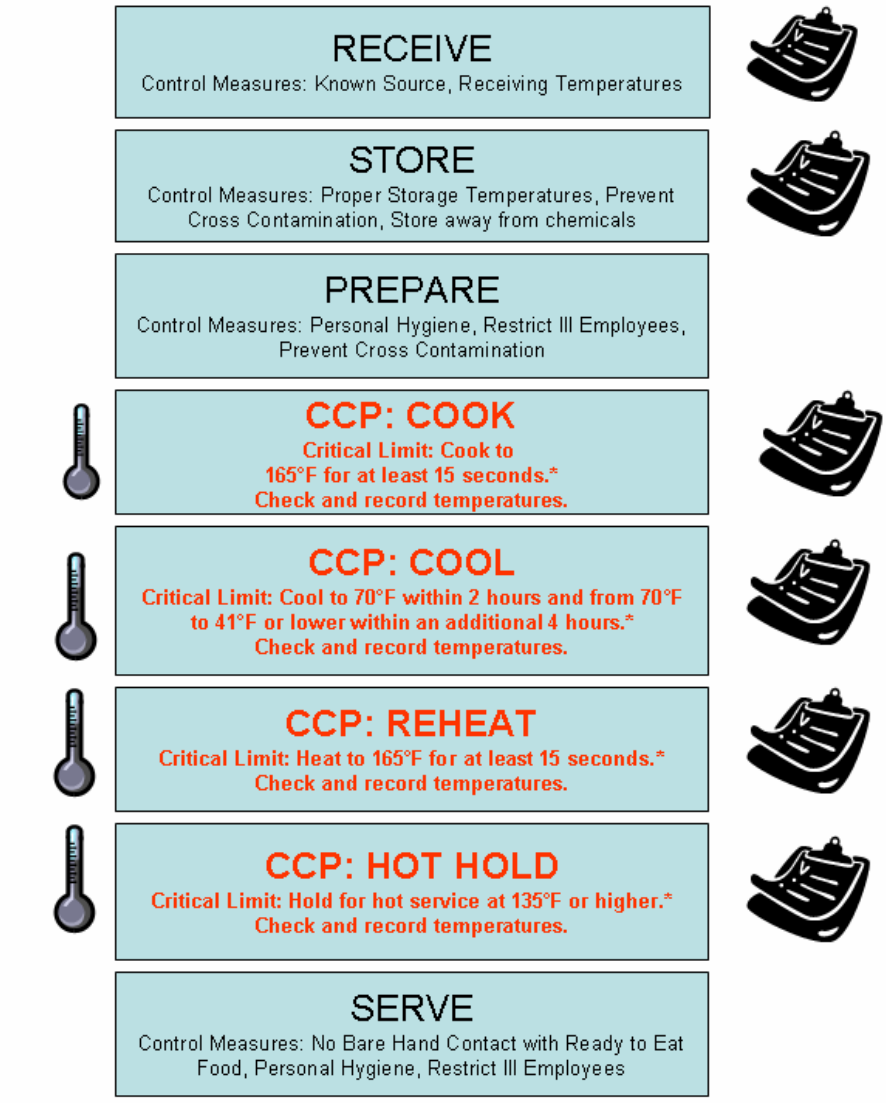
 Thermometer icon means that taking a temperature is necessary.

 Clipboard icon means recording data is necessary.

*From the 2001 FDA Food Code (as amended August 29, 2993 in the Supplement to the 2001 Food Code).

Process 3: Complex Food Preparation

Example: Beef and Bean Tamale Pie



Thermometer icon means that taking a temperature is necessary.

Clipboard icon means recording data is necessary.

*From the 2001 FDA Food Code (as amended August 29, 2993 in the Supplement to the 2001 Food Code).

Step 7: Review and revise your overall food safety program periodically.

There should be an ongoing as well as a periodic review of the activities described in your food safety program. This step ensures that the food safety program is operating according to what is specified in each school's plan. Designated individuals such as the manager should periodically make observations of employees' monitoring activities, calibrate equipment and temperature measuring devices, review records/actions, and discuss procedures with employees. All of these activities should take place regularly to verify that the program is addressing the food safety concerns and, if not, checking to see if it needs to be modified or improved.

Review and revise your food safety program at least annually or as often as necessary to reflect any changes in your facility. These may include new equipment, new menu items, reports of illness or comments on health inspections, or other factors that indicate how well your food safety program is working. Determine who will review the current plan, when it will be done, and how it will be documented.

VI. Other Factors in the Success of your Food Safety Program

The success of a food safety program is dependent upon facilities, equipment, and people. The facilities and equipment should be selected or designed to promote safe food preparation and handling practices by employees. Review your facilities and correct or modify barriers to safe food preparation. For example, faulty or out-dated plumbing or lack of appropriate thermometers could be a barrier to safe food production.

Managers and employees need to be properly trained to successfully reduce the occurrence of foodborne risk factors. A food safety program is effective when each employee knows his/her role and is committed to making it work. Also consider obstacles such as high employee turnover or communication barriers when designing and implementing a food safety program.

The following practices contribute to a successful food safety program:

- Providing on-going food safety training for all employees.
- Reviewing food safety principles, including SOP guidelines, for all employees on an annual basis.
- Requiring new employees, including substitutes and volunteers, to complete initial food safety training before handling food.
- Maintaining training and attendance records on all employees at each facility.
- Holding facility managers responsible for maintaining employee training standards.

VII. Getting Started

You can develop your own food safety program based on HACCP principles by applying the principles in this guidance. The appendices provide a variety of tools and resources, including recordkeeping logs, checklists, sample SOPs, and a sample food safety plan. You can use or adapt these tools to your unique operation.

GLOSSARY

All of the definitions in this glossary, except those marked with an asterisk (*), have been taken from the Food and Drug Administration document *Managing Food Safety: A Manual for the Voluntary Use of HACCP Principles for Operators of Food Service and Retail Establishments (draft September 29, 2004).*

APPROVED SOURCE: An acceptable supplier to the regulatory authority based on a determination of conformity with principles, practices, and generally recognized standards that protect public health.

CCP: Critical Control Point.

CONTAMINATION: The unintended presence in food of potentially harmful substances, including micro-organisms, chemicals, and physical objects.

CONTROL MEASURE: Any action or activity that can be used to prevent, eliminate, or reduce an identified hazard. Control measures determined to be essential for food safety are applied at critical control points in the flow of food.

CORRECTIVE ACTION: An activity that is taken by a person whenever a critical limit is not met.

CRITICAL CONTROL POINT (CCP): An operational step in a food preparation process at which control can be applied and is essential to prevent or eliminate a hazard or reduce it to an acceptable level.

CRITICAL LIMIT: One or more prescribed parameters that must be met to ensure that a CCP effectively controls a hazard.

CROSS-CONTAMINATION: The transfer of harmful substances or disease-causing micro-organisms to food by hands, food contact surfaces, sponges, cloth towels and utensils that touch raw food, are not cleaned, and then touch ready-to-eat foods. Cross contamination can also occur when raw food touches or drips onto cooked or ready-to-eat foods.

DANGER ZONE: The temperature range between 5 °C (41 °F) and 57 °C (135 °F) that favors the growth of pathogenic micro-organisms.

EXCLUDE: To prevent a person from working as a food employee or entering a food establishment except for those areas open to the general public.

FOOD: Raw, cooked, or processed edible substance, ice, beverage, chewing gum or ingredient used or intended for use or for sale in whole or in part for human consumption.

FOOD ESTABLISHMENT: An operation at the retail or food service level, i.e., that serves or offers food directly to the consumer and that, in some cases, includes a production, storage, or distributing operation that supplies the direct-to-consumer operation (satellite kitchens).

FOOD PREPARATION PROCESS: A series of operational steps conducted to produce a food ready to be consumed.

FOODBORNE ILLNESS: A sickness resulting from the consumption of foods or beverages contaminated with disease-causing micro-organisms, chemicals, or other harmful substances.

FOODBORNE OUTBREAK: The occurrence of two or more cases of a similar illness resulting from the ingestion of a common food.

HACCP: Hazard Analysis and Critical Control Point.

HACCP PLAN: A written document that is based on the principles of HACCP and describes the procedures to be followed to ensure the control of a specific process or procedure.

HAZARD: A biological, physical, or chemical property that may cause a food to be unsafe for human consumption.

HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP): A prevention-based food safety system that identifies and monitors specific food safety hazards that can adversely affect the safety of food products.

INTERNAL TEMPERATURES: The temperature of the internal portion of a food product.

MEAT: The flesh animals used as food including dressed flesh of cattle, swine, sheep, or goats and other edible animals, except fish, poultry and wild game animals.

MICRO-ORGANISM: A form of life that can be seen only under the microscope; including bacteria, viruses, yeast, and single-celled animals.

MONITORING: The act of observing and making measurements to help determine if critical limits are being met and maintained.

*** NSLP:** National School Lunch Program.

OPERATIONAL STEP: An activity or stage in the flow of food through a food establishment, such as receiving, storage, preparation, cooking, etc.

PATHOGEN: A micro-organism (bacteria, parasites, viruses, or fungi) that causes diseases in humans.

PERSONAL HYGIENE: Individual cleanliness and habits.

POTENTIALLY HAZARDOUS FOOD: A food that is natural or synthetic and that requires temperature control because it is capable of supporting:

- the rapid and progressive growth of infectious or toxigenic micro-organisms.
- the growth and toxin production of *Clostridium* botulinum or
- in raw eggs, the growth of *Salmonella* enteritidis; and

Includes foods of animal origin that are raw or heat-treated; foods of plant origin that are heat treated or consists of raw sprouts, cut melons, and garlic in oil mixtures that are not acidified or otherwise modified at a processing plant in a way that results in mixtures that do not support growth of pathogenic micro-organisms as described above.

PROCESS APPROACH: A method of categorizing food operations into one of three categories:

- Process 1: Food preparation with no cook step, wherein ready-to-eat food is received, stored, prepared, held and served;
- Process 2: Food preparation for same day service wherein food is received, stored, prepared, cooked, held and served; or
- Process 3: Complex food preparation wherein food is received, stored, prepared, cooked, cooled, reheated, hot held, and served.

RECORD: A documentation of monitoring observations and verification activities.

REGULATORY AUTHORITY: A Federal, State, local, or tribal enforcement body or authorized representative having jurisdiction over the food establishment.

RESTRICT: To limit the activities of a food employee so that there is no risk of transmitting a disease that is transmissible through food and the food employee does not work with exposed food, clean equipment, utensils, linens, and unwrapped single-service or single-use articles.

RISK: An estimate of the likely occurrence of a hazard.

RISK FACTOR: One of the factors identified by the Centers for Disease Control and Prevention (CDC) as contributors to the foodborne outbreaks that have been investigated and confirmed. The factors are unsafe sources, inadequate cooking, improper holding, contaminated equipment, and poor personal hygiene.

*** SFA**: School Food Authority

SEVERITY: The seriousness of the effect(s) of a hazard.

SOP: Standard Operating Procedure.

STANDARD OPERATING PROCEDURE (SOP) –A written method of controlling a practice in accordance with predetermined specifications to obtain a desired outcome.

TEMPERATURE MEASURING DEVICE –A thermometer, thermocouple, thermistor, or other device for measuring the temperature of food, air, or water.

Appendix I. (Samples) Standard Operating Procedures

A. Cooking Potentially Hazardous Foods
B. Cooling Potentially Hazardous Foods
C. Holding Hot and Cold Potentially Hazardous Foods
D. Date Marking Ready-to-Eat, Potentially Hazardous Foods
E. Personal Hygiene
F. Reheating Potentially Hazardous Foods
G. Receiving Deliveries
H. Storing and Using Poisonous or Toxic Chemicals
I. Using Suitable Utensils When Handling Ready-to-Eat Foods
J. Washing Fresh Fruits and Vegetables
K. Washing Hands

Cooking Potentially Hazardous Foods

(Sample SOP)

Purpose: To prevent foodborne illness by ensuring that all foods are cooked to the appropriate internal temperature

Scope: This procedure applies to foodservice employees who prepare or serve food.

Key Words: Cross-Contamination, Temperatures, Cooking

Instructions:

1. Train foodservice employees who prepare or serve food on how to use a food thermometer and cook foods using this procedure.
2. If a recipe contains a combination of meat products, cook the product to the highest required temperature.
3. Follow State or local health department requirements regarding internal cooking temperatures.
4. If State or local health department requirements are based on the *2001 FDA Food Code*, cook products to the following temperatures:
5. 145 ^{o}F for 15 seconds
    a. Seafood, beef, and pork
    b. Eggs cooked to order that are placed onto a plate and immediately served
6. 155 ^{o}F for 15 seconds
    a. Ground products containing beef, pork, or fish
    b. Fish nuggets or sticks
    c. Eggs held on a steam table
    d. Cubed or Salisbury steaks
7. 165 ^{o}F for 15 seconds
    a. Poultry
    b. Stuffed fish, pork, or beef
    c. Pasta stuffed with eggs, fish, pork, or beef (like lasagna or manicotti)
8. 135 ^{o}F for 15 seconds
    a. Fresh, frozen, or canned fruits and vegetables that are going to be held on a steam table or in a hot box

Monitoring:

1. Use a clean, sanitized, and calibrated probe thermometer (preferably a thermocouple).
2. Avoid inserting the thermometer into pockets of fat or near bones when taking internal cooking temperatures.
3. Take at least two (2) internal temperatures from each batch of food by inserting the thermometer into the thickest part of the product (usually the center).

4. Take at least two (2) internal temperatures of each large food item, like a turkey, to ensure that all parts of the product reach the required cooking temperature.

Corrective Action:

Continue cooking food until the internal temperature reaches the required temperature.

Verification and Record Keeping:

Foodservice employees will record product name, time, the two (2) temperatures/times, and any corrective action taken on the Cooking - Reheating Temperature Log. Foodservice manager will verify that foodservice employees has taken the required cooking temperatures by visually monitoring foodservice employees and preparation procedures during the shift and reviewing, initialing, and dating the temperature log at the close of each day. The Cooking – Reheating Temperature Log are kept on file for a minimum of one year.

Date Implemented: **By:**

Date Reviewed: **By:**

Date Revised: **By:**

Cooling Potentially Hazardous Foods

(Sample SOP)

Purpose: To prevent foodborne illness by ensuring that all potentially hazardous foods are cooled properly

Scope: This procedure applies to foodservice employees who prepares, handles, or serves food.

Key Words: Cross-Contamination, Temperatures, Cooling, Holding

Instructions:

1. Train foodservice employees who prepare or serve food on how to use a food thermometer and how to cool foods using this procedure.
1. Modify menus, production schedules, and staff work hours to allow for implementation of proper cooling procedures.
2. Prepare and cool food in small batches.
3. Chill food rapidly using an appropriate cooling method:
    - Place food in shallow containers (no more than 4 inches deep) and uncovered on the top shelf in the back of the walk-in or reach-in cooler
    - Use a quick-chill unit like a blast chiller
    - Stir the food in a container placed in an ice water bath
    - Add ice as an ingredient
    - Separate food into smaller or thinner portions
    - Pre-chill ingredients and containers used for making bulk items like salads
4. Follow State or local health department requirements regarding required cooling parameters.
5. If State or local requirements are based on the *2001 FDA Food Code*, chill cooked hot food from:
    - 135 ºF to 70 ºF within 2 hours. Take corrective action immediately if food is not chilled from 135 ºF to 70 ºF within 2 hours.
    - 70 ºF to 41 ºF or below in remaining time. The total cooling process from 135 ºF to 41 ºF may not exceed 6 hours. Take corrective action immediately if food is not chilled from 135 ºF to 41 ºF within the 6 hour cooling process.
6. Chill prepared, ready-to-eat foods such as tuna salad and cut melons from 70 ºF to 41 ºF or below within 4 hours. Take corrective action immediately if ready-to-eat food is not chilled from 70 ºF to 41 ºF within 4 hours.

Cooling Potentially Hazardous Foods, continued

(Sample SOP)

Monitoring:

1. Use a clean, sanitized, and calibrated probe thermometer to measure the internal temperature of the food during the cooling process.
2. Monitor temperatures of products every hour throughout the cooling process by inserting a thermometer into the center of the food and at various locations in the product.

Corrective Action:

1. Reheat cooked hot food to 165 ºF for 15 seconds and start the cooling process again using a different cooling method when the food is
    - Above 70 ºF and 2 hours or less into the cooling process; and
    - Above 41 ºF and 6 hours or less into the cooling process.
2. Discard cooked hot food immediately when the food is
    - Above 70 ºF and more than 2 hours into the cooling process; or
    - Above 41 ºF and more than 6 hours into the cooling process.
3. Use a different cooling method for prepared ready-to-eat foods when the food is above 41 ºF and less than 4 hours into the cooling process.
4. Discard prepared ready-to-eat foods when the food is above 41 ºF and more than 4 hours into the cooling process.

Verification and Record Keeping:

Foodservice employees will record temperatures and corrective actions taken on the Cooling Temperature Log. Foodservice employees will record if there are no foods cooled on any working day by indicating "No Foods Cooled" on the Cooling Temperature Log. Foodservice manager will verify that foodservice employees are cooling food properly by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating the temperature log each working day. The Cooling Temperature Logs are kept on file for a minimum of one year.

Date Implemented: **By:**

Date Reviewed: **By:**

Date Revised: **By:**

Holding Hot and Cold Potentially Hazardous Foods

(Sample SOP)

Purpose: To prevent foodborne illness by ensuring that all potentially hazardous foods are held at the proper temperature

Scope: This procedure applies to foodservice employees who prepare or serve food.

Key Words: Cross-Contamination, Temperatures, Holding, Hot Holding, Cold Holding, Storage

Instructions:

1. Train foodservice employees who prepare or serve food about proper hot and cold holding procedures. Include in the training a discussion of the temperature danger zone.
2. Follow State or local health department requirements regarding required hot and cold holding temperatures. If State or local health department requirements are based on the *2001 FDA Food Code*:
    - Hold hot foods at 135 ºF or above; and
    - Cold foods at 41 ºF or below.
3. Preheat steam tables and hot boxes.

Monitoring:

1. Use a clean, sanitized, and calibrated probe thermometer to measure the temperature of the food.
2. Take temperatures of foods by inserting the thermometer near the surface of the product, at the thickest part, and at other various locations.
3. Take temperatures of holding units by placing a calibrated thermometer in the coolest part of a hot holding unit or warmest part of a cold holding unit.
4. For hot-held foods:
    - Verify that the air/water temperature of any unit is at 135 ºF or above before use.
    - Reheat foods in accordance with the Reheating for Hot Holding SOP.
    - All hot potentially hazardous foods should be 135 ºF or above before placing the food out for display or service.
    - Take the internal temperature of food before placing it on a steam table or in a hot holding unit and at least every 2 hours thereafter.
5. For cold foods held for service:
    - Verify that the air/water temperature of any unit is at 41 ºF or below before use.
    - Chill foods, if applicable, in accordance with the Cooling SOP.

Holding Hot and Cold Potentially Hazardous Foods, continued
(Sample SOP)

- All cold potentially hazardous foods should be 41 ºF or below before placing the food out for display or service.
- Take the internal temperature of the food before placing it onto any salad bar, display cooler, or cold serving line and at least every 2 hours thereafter.

6. For cold foods in storage:
    - Take the internal temperature of the food before placing it into any walk-in cooler or reach-in cold holding unit.
    - Chill food in accordance with the Cooling SOP if the food is not 41 ºF or below.
    - Verify that the air temperature of any cold holding unit is at 41 ºF or below before use and at least every 4 hours thereafter during all hours of operation.

Corrective Action:

For hot foods:

- Reheat the food to 165 ºF for 15 seconds if the temperature is found to be below 135 ºF and the last temperature measurement was 135 ºF or higher and taken within the last 2 hours. Repair or reset holding equipment before returning the food to the unit, if applicable.
- Discard the food if it cannot be determined how long the food temperature was below 135 ºF.

For cold foods:

- Rapidly chill the food using an appropriate cooling method if the temperature is found to be above 41 ºF and the last temperature measurement was 41 ºF or below and taken within the last 2 hours:
    - Place food in shallow containers (no more than 4 inches deep) and uncovered on the top shelf in the back of the walk-in or reach-in cooler
    - Use a quick-chill unit like a blast chiller
    - Stir the food in a container placed in an ice water bath
    - Add ice as an ingredient
    - Separate food into smaller or thinner portions
- Repair or reset holding equipment before returning the food to the unit, if applicable.
- Discard the food if it cannot be determined how long the food temperature was above 41 ºF.

Holding Hot and Cold Potentially Hazardous Foods, continued
(Sample SOP)

Verification and Record Keeping:

Foodservice employees will record temperatures of food items and document corrective actions taken on the Hot and Cold Holding Temperature Log. A designated foodservice employee will record air temperatures of coolers and cold holding units on the Refrigeration Logs. Foodservice manager will verify that foodservice employees have taken the required holding temperatures by visually monitoring foodservice employees during the shift and reviewing the temperature logs at the close of each day. The temperature logs are kept on file for a minimum of one year.

Date Implemented: **By:**

Date Reviewed: **By:**

Date Revised: **By:**

Date Marking Ready-to-Eat, Potentially Hazardous Food

(Sample SOP)

Purpose: To ensure appropriate rotation of ready-to-eat food to prevent or reduce foodborne illness from *Listeria monocytogenes*

Scope: This procedure applies to foodservice employees who prepares, stores, or serves food.

Key Words: Ready-to-Eat Food, Potentially Hazardous Food, Date Marking, Cross-Contamination

Instructions:

1. Establish a date marking system and train employees accordingly. The best practice for a date marking system would be to include a label with the product name, the day or date, and time it is prepared or opened. Examples of how to indicate when the food is prepared or opened include:
    - Labeling food with a calendar date, i.e. cut cantaloupe, 5/26/05, 8:00 a.m.,
    - Identifying the day of the week, i.e. cut cantaloupe, Monday, 8:00 a.m., or
    - Using color-coded marks or tags, i.e. cut cantaloupe, blue dot, 8:00 a.m. means "cut on Monday at 8:00 a.m.".
2. Label ready-to-eat, potentially hazardous foods that are prepared on-site and held for more than 24 hours.
3. Label any processed, ready-to-eat, potentially hazardous foods when opened, if they are to be held for more than 24 hours.
4. Refrigerate all ready-to-eat, potentially hazardous foods at 41º F or below.
5. Serve or discard refrigerated, ready-to-eat, potentially hazardous foods within 7 days.
6. Indicate with a separate label the date prepared, the date frozen, and the date thawed of any refrigerated, ready-to-eat, potentially hazardous foods.
7. Calculate the 7-day time period by counting only the days that the food is under refrigeration. For example:
    - On Monday, 8/1/05, lasagna is cooked, properly cooled, and refrigerated with a label that reads, "Lasagna – Cooked – 8/1/05."
    - On Tuesday, 8/2/05, the lasagna is frozen with a second label that reads, "Frozen – 8/2/05." Two labels now appear on the lasagna. Since the lasagna was held under refrigeration from Monday, 8/1/05 – Tuesday, 8/2/05, only 1 day is counted towards the 7-day time period.
    - On Tuesday, 8/16/05, the lasagna is pulled out of the freezer. A third label is placed on the lasagna that reads, "Thawed – 8/16/05." All three labels now appear on the lasagna. The lasagna must be served or discarded within 6 days.
8. Follow State and local public health requirements.

Date Marking Ready-to-Eat, Potentially Hazardous Food, continued

(Sample SOP)

Monitoring:

A designated employee will check refrigerators daily to verify that foods are date marked and that foods exceeding the 7-day time period are not being used or stored.

Corrective Measure:

Foods that are not date marked or that exceed the 7-day time period will be discarded.

Verification and Record Keeping:

Foodservice manager will complete the Food Safety Checklist daily.

Date Implemented: **By:**

Date Reviewed: **By:**

Date Revised: **By:**

Personal Hygiene

(Sample SOP)

Purpose: To prevent contamination of food by foodservice employees

Scope: This procedure applies to foodservice employees who handles, prepares, or serves food

Key Words: Personal Hygiene, Cross-Contamination, Contamination

Instructions:

1. Train foodservice employees on the employee health policy (Develop SOP for Implementing an Employee Health Policy) and on practicing good personal hygiene.
2. Follow the employee health policy.
3. Report to work in good health, clean, and dressed in clean attire.
4. Change apron when it becomes soiled.
5. Wash hands properly, frequently, and at the appropriate times.
6. Keep fingernails trimmed, filed, and maintained so that the edges are cleanable and not rough.
7. Avoid wearing artificial fingernails and fingernail polish.
8. Wear single-use gloves if artificial fingernails or fingernail polish are worn.
9. Do not wear any jewelry except for a plain ring such as a wedding band.
10. Treat and bandage wounds and sores immediately. When hands are bandaged, single use gloves must be worn.
11. Cover a lesion containing pus with a bandage. If the lesion is on a hand or wrist, cover with an impermeable cover such as a finger cot or stall and a single-use glove.
12. Eat, drink, use tobacco, or chew gum only in designated break areas where food or food contact surfaces may not become contaminated.
13. Taste food the correct way:
    - Place a small amount of food into a separate container.
    - Step away from exposed food and food contact surfaces.
    - Use a teaspoon to taste the food. Remove the used teaspoon and container to the dish room. Never reuse a spoon that has already been used for tasting.
    - Wash hands immediately.
14. Wear suitable and effective hair restraints while in the kitchen.
15. Follow State and local public health requirements.

Personal Hygiene, continued

(Sample SOP)

Monitoring:

A designated foodservice employee will inspect employees when they report to work to be sure that each employee is following this SOP. The designated foodservice employee will monitor that all foodservice employees are adhering to the personal hygiene policy during all hours of operation.

Corrective Action:

Any foodservice employee found not following this procedure will be retrained at the time of the incident. Affected food will be discarded.

Verification and Record Keeping:

The foodservice manager will verify that foodservice employees are following this policy by visually observing the employees during all hours of operation. The foodservice manager will complete the Food Safety Checklist daily. Foodservice employees will record any discarded food on the Damaged or Discarded Product Log, which will be kept on file for a minimum of one year.

Date Implemented: **By:**

Date Reviewed: **By:**

Date Revised: **By:**

Reheating Potentially Hazardous Foods

(Sample SOP)

Purpose: To prevent foodborne illness by ensuring that all foods are reheated to the appropriate internal temperature

Scope: This procedure applies to foodservice employees who prepare or serve food.

Key Words: Cross-Contamination, Temperatures, Reheating, Holding, Hot holding

Instructions:

1. Train foodservice employees who prepare or serve food on using a food thermometer and how to reheat foods using this procedure.
2. Follow State or local health department requirements regarding reheating temperatures.
3. If State or local requirements are based on the *2001 FDA Food Code,* heat processed, ready-to-eat foods from a package or can, such as canned green beans or prepackaged breakfast burritos, to an internal temperature of at least 135 ^{o}F for 15 seconds for hot holding.
4. Reheat the following products to 165 ^{o}F for 15 seconds:
   - Any food that is cooked, cooled, and reheated for hot holding
   - Leftovers reheated for hot holding
   - Products made from leftovers, such as soup
   - Precooked, processed foods that have been previously cooled
5. Reheat food for hot holding in the following manner if using a microwave oven:
   - Heat processed, ready-to-eat foods from a package or can to at least 135 ^{o}F for 15 seconds
   - Heat leftovers to 165 ^{o}F for 15 seconds
   - Rotate (or stir) and cover foods while heating
   - Allow to sit for 2 minutes after heating
6. Reheat all foods rapidly. The total time the temperature of the food is between 41 ^{o}F and 165 ^{o}F may not exceed 2 hours.
7. Serve reheated food immediately or transfer to an appropriate hot holding unit.

Monitoring:

1. Use a clean, sanitized, and calibrated probe thermometer.
2. Take at least two internal temperatures from each pan of food.

Reheating Potentially Hazardous Foods, continued

(Sample SOP)

Corrective Action:

Continue reheating/heating food if the internal temperature does not reach the required temperature.

Verification and Record Keeping:

Foodservice employees will record product name, time, the two temperatures/times, and any corrective action taken on the Cooking – Reheating Temperature Log. Foodservice manager will verify that foodservice employees have taken the required reheating temperatures by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating the Cooking – Reheating Temperature Log at the close of each day. The Cooking – Reheating Temperature Logs are kept on file for a minimum of one year.

Date Implemented: **By:**

Date Reviewed: **By:**

Date Revised: **By:**

Receiving Deliveries

(Sample SOP)

Purpose: To ensure that all food is received fresh and safe when it enters the foodservice operation, and to transfer food to proper storage as quickly as possible

Scope: This procedure applies to foodservice employees who handles, prepares, or serves food.

Key Words: Cross-Contamination, Temperatures, Receiving, Holding, Frozen Goods, Delivery

Instructions:

1. Train foodservice employees who accept deliveries on proper receiving procedures.
2. Schedule deliveries to arrive at designated times during operational hours.
3. Post the delivery schedule including the names of vendors, days and times of deliveries, and drivers' names.
4. Establish a rejection policy to ensure accurate, timely, consistent, and effective refusal and return of rejected goods.
5. Organize freezer and refrigeration space, loading docks, and store rooms before deliveries.
6. Gather product specification lists and purchase orders, temperature logs, calibrated thermometers, pens, flashlights, and clean loading carts before deliveries.
7. Keep receiving area clean and well lighted.
8. Do not touch ready-to-eat foods with bare hands.
9. Determine whether foods will be marked with the date of arrival or the "use-by" date and mark accordingly upon receipt.
10. Compare delivery invoice against products ordered and products delivered.
11. Transfer foods to their appropriate locations as quickly as possible.

Monitoring:

1. Inspect the delivery truck when it arrives to ensure that it is clean, free of putrid odors, and organized to prevent cross-contamination. Be sure refrigerated foods are delivered on a refrigerated truck.
2. Check the interior temperature of refrigerated trucks.
3. Confirm vendor name, day and time of delivery, as well as driver's identification before accepting delivery. If driver's name is different than what is indicated on the delivery schedule, contact the vendor immediately.
4. Check frozen foods to ensure that they are all frozen solid and show no signs of thawing and refreezing, such as the presence of large ice crystals or liquids on the bottom of cartons.

Receiving Deliveries, continued

(Sample SOP)

5. Check the temperature of refrigerated foods.
    a. For fresh meat, fish, and poultry products, insert a clean and sanitized thermometer into the center of the product to ensure a temperature of 41 ºF or below. The temperature of milk should be 45 ºF or below.
    b. For packaged products, insert a food thermometer between two packages being careful not to puncture the wrapper. If the temperature exceeds 41 ºF, it may be necessary to take the internal temperature before accepting the product.
    c. For eggs, the interior temperature of the truck should be 45 ºF or below.
6. Check dates of milk, eggs, and other perishable goods to ensure safety and quality.
7. Check the integrity of food packaging.
8. Check the cleanliness of crates and other shipping containers before accepting products. Reject foods that are shipped in dirty crates.

Corrective Action:

1. Reject the following:
    a. Frozen foods with signs of previous thawing
    b. Cans that have signs of deterioration – swollen sides or ends, flawed seals or seams, dents, or rust
    c. Punctured packages
    d. Expired foods
    e. Foods that are out of safe temperature zone or deemed unacceptable by the established rejection policy

Verification and Record Keeping:

Record temperature and corrective action on the delivery invoice or on the Receiving Log. Foodservice manager will verify that foodservice employees are receiving products using the proper procedure by visually monitoring receiving practices during the shift and reviewing the Receiving Log at the close of each day. Receiving Logs are kept on file for a minimum of one year.

Date Implemented: **By:**

Date Reviewed: **By:**

Date Revised: **By:**

Storing and Using Poisonous or Toxic Chemicals

(Sample SOP)

Purpose: To prevent foodborne illness by chemical contamination

Scope: This procedure applies to foodservice employees who use chemicals in the kitchen.

Keywords: Chemicals, Cross-Contamination, Contamination, Material Safety Data Sheet

Instructions:

1. Train foodservice employees on the proper use, storage, and first aid of chemicals and on the proper use of chemical test kits as specified in this procedure.
2. Designate a location for storing the Material Safety Data Sheets (MSDS).
3. Label and date all poisonous or toxic chemicals with the common name of the substance.
4. Store all chemicals in a designated secured area away from food and food contact surfaces using spacing or partitioning.
5. Limit access to chemicals by use of locks, seals, or key cards.
6. Maintain an inventory of chemicals.
7. Store only chemicals that are necessary to the operation and maintenance of the kitchen.
8. Mix, test, and use sanitizing solutions as recommended by the manufacturer, State, or local health department.
9. Use the appropriate chemical test kit to measure the concentration of sanitizer each time a new batch of sanitizer is mixed.
10. Follow manufacturer's directions for specific mixing, storing, and first aid instructions on chemicals.
11. Do not use chemical containers for storing food or water.
12. Use only hand sanitizers that comply with the *2001 FDA Food Code.* Confirm with the manufacturer that the hand sanitizers used meet the requirements of the *FDA Food Code.*
13. Label and store first aid supplies in a container that is located away from food or food contact surfaces.
14. Label and store medicines for employee use in a designated area and away from food contact surfaces. Do not store medicines in food storage areas.
15. Store refrigerated medicines in a covered, leak proof container, where they are not accessible to children, and cannot contaminate food.
16. Follow State and local public health requirements.

Storing and Using Poisonous or Toxic Chemicals, continued

(Sample SOP)

Monitoring:

Foodservice employees and foodservice manager will visually observe that chemicals are being stored, labeled, and used properly during all hours of operation.

Corrective Action:

Discard any food contaminated by chemicals. Label and/or properly store any unlabeled or misplaced chemicals.

Verification and Record Keeping:

Foodservice manager will complete the Food Safety Checklist daily to indicate that monitoring is completed. Foodservice employees will record the name of the contaminated food, date, time, and the reason why the food was discarded on the Damaged and Discarded Product Log. The foodservice manager will verify that appropriate corrective actions are being taken by reviewing, initialing, and dating the Damaged and Discarded Product Log each day. Damaged and Discarded Product Logs are kept on file for a minimum of one year.

Date Implemented: **By:**

Date Reviewed: **By:**

Date Revised: **By:**

Using Suitable Utensils When Handling Ready-to-Eat Foods

(Sample SOP)

Purpose: To prevent foodborne illness due to hand-to-food cross-contamination

Scope: This procedure applies to foodservice employees who prepare, handle, or serves food.

Key Words: Ready-to-Eat food, Cross-Contamination

Instructions:

1. Use proper hand washing procedures to wash hands and exposed arms prior to preparing or handling food or at anytime when the hands may have become contaminated.
2. Do not use bare hands to handle ready-to-eat foods at any time unless washing fruits and vegetables.
3. Use suitable utensils when working with ready-to-eat food. Suitable utensils may include:
   - Single-use gloves
   - Deli tissue
   - Foil wrap
   - Tongs, spoodles, spoons, and spatulas
4. Wash hands and change gloves:
   - Before beginning food preparation
   - Before beginning a new task
   - After touching equipment (such as refrigerator doors) or utensils that have not been cleaned and sanitized
   - After contacting chemicals
   - When interruptions in food preparation occur, such as when answering the telephone or checking in a delivery
   - Handling money
   - Anytime a glove is torn, damaged, or soiled
   - Anytime contamination of a glove might have occurred
5. Follow State and local public health requirements.

Monitoring:

A designated foodservice employee will visually observe that gloves or suitable utensils are used and changed at the appropriate times during all hours of operation.

Using Suitable Utensils When Handling Ready-to-Eat Foods, continued

(Sample SOP)

Corrective Action:

Employees observed touching ready-to-eat food with bare hands will be retrained at the time of the incident. Ready-to-eat food touched with bare hands will be discarded.

Verification and Record Keeping:

The foodservice manager will verify that foodservice workers are using suitable utensils by visually monitoring foodservice employees during all hours of operation. The foodservice manager will complete the Food Safety Checklist daily. The designated foodservice employee responsible for monitoring will record any discarded food on the Damaged and Discarded Product Log. This log will be maintained for a minimum of one year.

Date Implemented: **By:**

Date Reviewed: **By:**

Date Revised: **By:**

Washing Fruits and Vegetables

(Sample SOP)

Purpose: To prevent or reduce risk of foodborne illness or injury by contaminated fruits and vegetables.

Scope: This procedure applies to foodservice employees who prepare or serve food.

Keywords: Fruits, Vegetables, Cross-Contamination, Washing

Instructions:

1. Train foodservice employees who prepare or serve food on how to properly wash and store fresh fruits and vegetables.
2. Wash hands using the proper procedure.
3. Wash, rinse, sanitize, and air-dry all food-contact surfaces, equipment, and utensils that will be in contact with produce, such as cutting boards, knives, and sinks.
4. Follow manufacturer's instructions for proper use of chemicals.
5. Wash all raw fruits and vegetables thoroughly before combining with other ingredients, including:
   - Unpeeled fresh fruit and vegetables that are served whole or cut into pieces.
   - Fruits and vegetables that are peeled and cut to use in cooking or served ready-to-eat.
6. Wash fresh produce vigorously under cold running water or by using chemicals that comply with the *2001 FDA Food Code.* Packaged fruits and vegetables labeled as being previously washed and ready-to-eat are not required to be washed.
7. Scrub the surface of firm fruits or vegetables such as apples or potatoes using a clean and sanitized brush designated for this purpose.
8. Remove any damaged or bruised areas.
9. Label, date, and refrigerate fresh-cut items.
10. Serve cut melons within 7 days if held at 41 ºF or below (see SOP for Date Marking, Ready-to-Eat, Potentially Hazardous Food).
11. Do not serve raw seed sprouts to highly susceptible populations such as preschool-age children.
12. Follow State and local public health requirements.

Monitoring:

Foodservice manager will visually monitor that fruits and vegetables are being properly washed, labeled, and dated during all hours of operation. In addition, foodservice employees will check daily the quality of fruits and vegetables in cold storage.

Washing Fruits and Vegetables, continued

(Sample SOP)

Corrective Action:

Unwashed fruits and vegetables will be removed from service and washed immediately before being served. Unlabeled fresh cut items will be labeled and dated. Discard cut melons held after 7 days.

Verification and Record Keeping:

Foodservice manager will complete the Food Safety Checklist daily to indicate that monitoring is being conducted as specified in this procedure.

Date Implemented: **By:**

Date Reviewed: **By:**

Date Revised: **By:**

Washing Hands

(Sample SOP)

Purpose: To prevent foodborne illness caused by contaminated hands

Scope: This procedure applies to anyone who handles, prepares, and serves food.

Keywords: Handwashing, Cross-Contamination

Instructions:

1. Train any individual who prepares or serves food on proper handwashing. Training may include viewing a handwashing video and demonstrating proper handwashing procedure.
2. Post handwashing signs or posters in a language understood by all foodservice staff near all handwashing sinks, in food preparation areas, and restrooms.
3. Use designated handwashing sinks for handwashing only. Do not use food preparation, utility, and dishwashing sinks for handwashing.
4. Provide warm running water, soap, and a means to dry hands. Provide a waste container at each handwashing sink or near the door in restrooms.
5. Keep handwashing sinks accessible anytime employees are present.
6. Wash hands:
    - Before starting work
    - During food preparation
    - When moving from one food preparation area to another
    - Before putting on or changing gloves
    - After using the toilet
    - After sneezing, coughing, or using a handkerchief or tissue
    - After touching hair, face, or body
    - After smoking, eating, drinking, or chewing gum or tobacco
    - After handling raw meats, poultry, or fish
    - After any clean up activity such as sweeping, mopping, or wiping counters
    - After touching dirty dishes, equipment, or utensils
    - After handling trash
    - After handling money
    - After any time the hands may become contaminated

Washing Hands, continued
(Sample SOP)

7. Follow proper handwashing procedures as indicated below:
    - Wet hands and forearms with warm, running water (at least 100 ºF) and apply soap.
    - Scrub lathered hands and forearms, under fingernails and between fingers for at least 10 - 15 seconds. Rinse thoroughly under warm running water for 5 - 10 seconds.
    - Dry hands and forearms thoroughly with single-use paper towels.
    - Dry hands for at least 30 seconds if using a warm air hand dryer.
    - Turn off water using paper towels.
    - Use paper towel to open door when exiting the restroom.
8. Follow FDA recommendations when using hand sanitizers. These recommendations are as follows:
    - Use hand sanitizers only after hands have been properly washed and dried.
    - Use only hand sanitizers that comply with the 2001 FDA Food Code. Confirm with the manufacturers that the hand sanitizers used meet these requirements. Use hand sanitizers in the manner specified by the manufacturer.

Monitoring:

A designated employee will visually observe the handwashing practices of the foodservice staff during all hours of operation. In addition, the designated employee will visually observe that handwashing sinks are properly supplied during all hours of operation.

Corrective Action:

Employees that are observed not washing their hands at the appropriate times or using the proper procedure will be asked to wash their hands immediately. Employee will be re-trained to ensure proper handwashing procedure.

Verification and Record Keeping:

Foodservice manager will complete the Food Safety Checklist daily to indicate that monitoring is being conducted as specified.

Date Implemented: **By:**
Date Reviewed: **By:**
Date Revised: **By:**

Appendix II. (SAMPLE) Procedure for Handling Leftover Sliced Turkey

A. Roast Turkey. Cook, Serve, Cool Leftovers, Reheat, and Serve

↓

Receive:
Frozen turkey from certified vendor (USDA inspected).

↓

Store in walk-in freezer (0°F or below).

↓

Thaw bulk turkey in refrigerator (41°F or below).

↓

Cook to proper temperature (165 °F for a minimum of 15 seconds).

↓

Slice, portion, and serve (hot holding at 135 °F or above).

↓

Immediately refrigerate leftovers. Place in shallow pans and cool to 41°F or below within 6 hours but from 135˚F to at least 70˚F in the first 2 hours. (Take temperature at 1.5 hours.)

↓

Remove leftovers from refrigerator and reheat to 165 °F for a minimum of 15 seconds.

↓

Hot hold at 135 °F or above.

↓

Serve.

Appendix III. (SAMPLE): Food Safety Plan

School Food Safety Program
Our Town Elementary School

Table of Contents

(SAMPLE: Food Safety Program Cont'd)

Description of Program Overview and Facility

This program was developed in May 2005 by Jane Doe, foodservice director, Our County School District, Our Town Elementary School. The program follows the USDA guidance on developing a food safety program based on the Process Approach to HACCP. All standards in this food safety program are based on recommendations in the 2001 Food Code.

Average Daily Participation

Breakfasts	100 Meals
Lunches	300 Meals

School Foodservice Staff

Manager
3 Staff

Kitchen Equipment

1 Mixer
1 Food Processor
1 Slicer
1 Walk-in Freezer
2 Reach-in Refrigerators
2 Convection Ovens
1 Combination Steamer
2 Heated Cabinets
2 Heated Serving Counters
1 Refrigerated Serving Counter
1 Milk Cooler
1 Dishmachine

Menu

2 Week Cycle with recipes/instructions in notebook in manager's office

NOTE: For the purpose of this example, all standards are based on the 2001 FDA Food Code (as amended August 29, 2003 in the Supplement to the 2001 Food Code). You may need to adopt a different set of standards in your particular program based on the authority recognized in your State.

(SAMPLE: Food Safety Program Cont'd)

STANDARD OPERATING PROCEDURES (SOP)

Standard Operating Procedures for Our Town Elementary School are listed below. Each SOP will be attached to this food safety program. Foodservice staff will be made aware of all SOPs during initial and in ongoing training.

1) **Facility-Wide**
    a) Washing Hands
    b) Calibrating a Thermometer
    c) Preventing Cross-Contamination
    d) Preventing Bare Hand Contact with Ready-to-Eat Foods
    e) Personal Hygiene
    f) Operating Without Power
    g) Operating Without Hot Water
    h) Storing and Using Chemicals
    i) Implementing an Employee Health Policy
    j) Purchasing from Reputable Vendors
    k) Receiving Deliveries
2) **Storing**
3) **Cooking**
4) **Cooling**
5) **Reheating**
6) **Preparation**
7) **Holding**
8) **Transporting**

Note: For the purpose of this sample document, some detailed SOPs have been included in Appendix I, Standard Operating Procedures. In an actual food safety program, all applicable SOPs should be documented and included in the written program.

(SAMPLE: Food Safety Program Cont'd)

FOOD PREPARATION ACTION PLAN

Categorizing Menu Items and Identifying Control Measures and Critical Control Points (CCPs):

The 2 week menu cycle is posted in the kitchen. Each menu item available for service is listed in this food safety program in the table below. When new menu items are added, the list is updated. Each item is evaluated to determine which of the three processes is applicable and to identify the appropriate control measures and critical control points (CCPs) using the Process Approach charts attached. Once the determination is made for each menu item, the food service manager will make the rest of the food service staff aware of the menu items and applicable process and control measures by posting the Process Charts in the kitchen. (These Process Charts containing the list of menu items are attached on the following pages.) In addition, the menu cycle, menus, recipes, product directions, and charts are kept in a notebook in the manager's office.

Staff:

- All foodservice personnel will be given an overview of the Process Approach to HACCP after being hired and before handling food.
- Any substitute food service staff will be given instructions on the Process Approach and a list of necessary procedures relevant to the tasks they will be performing and the corresponding records to be kept.
- Periodic refresher training for employees will be provided on a quarterly basis.
- An easily accessible copy of an explanation of the Process Approach taken from the USDA HACCP guidance document will be available in the manager's office.

(SAMPLE: Food Safety Program Cont'd)

MENU ITEMS SORTED BY PROCESS

PROCESS 1 (NO COOK)	PROCESS 2 (COOK AND SERVE SAME DAY)	PROCESS 3 (COMPLEX FOOD PREPARATION)
Milk	Green Beans in Cheese Sauce	Bean Burrito
Juice	Chili con Carne	Bean Soup
Tuna Salad Sandwich	Macaroni and Cheese	Potato Salad
Waldorf Fruit Salad	Scrambled Eggs	Fruit and Rice Dessert
Cole Slaw	Sloppy Joe on Roll	Rice Salad
Fresh Fruit	Mexicali Corn	
Egg Salad Sandwich	Scalloped Potatoes	
Broccoli Salad	Chicken Taco	
Three Bean Salad	Taco Salad	
Chicken or Turkey Salad	Refried Beans	
	Broccoli, Cheese and Rice Casserole	

NOTE: For the purpose of this example, only a sampling of menu items was listed. In an actual food safety program, all possible menu items should be included in such a list. This should include all food not only prepared on site, but all food served on site. For example, if the school receives ready-to-eat menu items, these items should also be included on this list. In addition, procedures for receiving ready-to-eat items should be included in the recipes/instructions portion of this program.

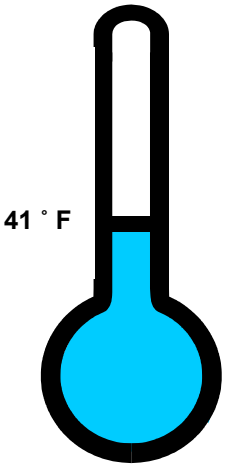
NOTE: Recipe numbers on Process Charts refer to USDA recipes. A full listing of the recipes can be found at:
http://www.nfsmi.org/Information/school_recipe_index_alpha.html

(SAMPLE: Food Safety Program Cont'd)

PROCESS CHART – PROCESS 1

Process 1 -NO COOK
Keep Food Below 41 ˚F Degrees

Menu Item	Recipe #
Milk	
Juice	
Tuna Salad Sandwich	F-11
Waldorf Fruit Salad	E-14
Cole Slaw	E-09
Fresh Fruit	
Fresh Vegetables	
Egg Salad Sandwich	F-10
Broccoli Salad	E-11
Three Bean Salad	E-04
Chicken or Turkey Salad	E-07



<u>Control measures</u>

CCP:

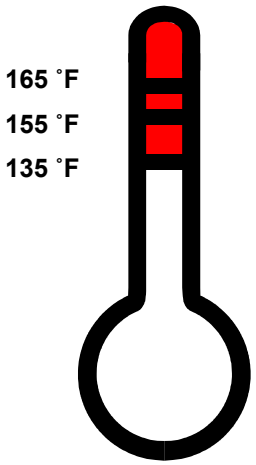
- Cold holding – Critical limit is 41º F or below

SOP:

- Personal Hygiene
- Washing Fresh Fruits and Vegetables
- Limiting time in the danger zone to inhibit bacterial growth and toxin production (e.g., holding at room temperature for 4 hours and then discarding)
- Verifying receiving temperatures of food
- Date marking of ready-to-eat food

Process 2-COOK and SAME DAY SERVE
Cook to Correct Temperature. Serve at 135 ˚F or above.

Menu Item	Recipe Number	Cooking Temperature
Green Beans in Cheese Sauce	I-11	140º F 15s
Chili con Carne	D-20	165º F 15 s
Macaroni & Cheese	D-26	165º F 15 s
Scrambled Eggs	D-34	155º F 15 s
Sloppy Joe on Roll	F-05	155º F 15 s
Mexicali Corn	I-12	140º F 15s
Scalloped Potatoes	I-16	140º F 15s
Chicken Taco	D-13C	165º F 15 s
Taco Salad	E-10	165º F 15 s
Refried Beans	I-15	140º F 15s
Broccoli, Cheese and Rice Casserole	I-08	165º F 15 s



Control measures

CCP:

- Cooking to destroy bacteria and other pathogens (CCPs with corresponding critical limits are noted above.)

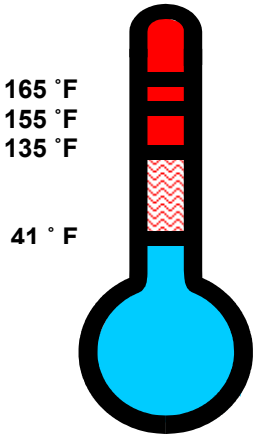
SOP:

- Hot holding or limiting time in the danger zone to prevent the outgrowth of spore-forming bacteria

(SAMPLE: Food Safety Program Cont'd)
PROCESS CHART – PROCESS 3

Process 3-COOK, COOL, REHEAT, SERVE
Limit Time in the Danger Zone (41 ˚F – 135 ˚F)

Menu Item	Recipe Number	Cooking Temperature	Cooling Temp.	Reheating Temp.
Bean Soup	H-08	At or above 165˚F for at least 15 seconds	Cool to 70º F in 2 hrs or less and then to 41˚F in 4 hrs or less.	At or above 165˚F for at least 15 seconds
Potato Salad	E-12	Cook potatoes	Cool to 70º F in 2 hrs or less and then to 41˚F in 4 hrs or less.	
Bean Burrito	D-21A	At or above 165˚F for at least 15 seconds	Cool to 70º F in 2 hrs or less and then to 41˚F in 4 hrs or less.	At or above 165˚F for at least 15 seconds
Fruit and Rice Dessert	B-09	Cook rice	Cool to 70º F in 2 hrs or less and then to 41˚F in 4 hrs or less.	
Rice Salad	E-02	Cook rice	Cool to 70º F in 2 hrs or less and then to 41˚F in 4 hrs or less.	



<u>Control measures</u>

CCP:

- Cooking to destroy bacteria and other pathogens (CCPs and critical limits are outlined above)
- Reheating for hot holding, if applicable

SOP:

- Cooling to prevent the outgrowth of spore-forming bacteria (SOP)
- Hot and cold holding or limiting time in the danger zone to inhibit bacterial growth and toxin formation (SOP)

(SAMPLE: Food Safety Program Cont'd)

MONITORING

Manager Responsibilities:

- The foodservice manager at each site will be responsible for ensuring assigned foodservice staff are properly monitoring control measures and CCPs at the required frequency and are documenting required records.
- The manager will also be responsible for monitoring the overall performance of standard operating procedures. (Specific details regarding monitoring are addressed in each SOP.)
- Monitoring will be a constant consideration. However, the manager will use the Food Safety Checklist to formally monitor foodservice staff at least once per week. (The checklist form has been included in Appendix IV.)

Foodservice Staff Responsibilities:

- Foodservice staff is responsible for monitoring individual critical control points (CCPs) in the handling and preparation of food.
- Foodservice staff is responsible for monitoring control points as defined in the standard operating procedures (SOPs).

(SAMPLE: Food Safety Program Cont'd)

CORRECTIVE ACTIONS

Documenting Corrective Actions:

- The foodservice director or manager* will be responsible for developing predetermined corrective actions for the most common deviations from control measures including critical control points (CCPs) and standard operating procedures (SOPs).
- The foodservice director or manager will review and update corrective actions at least annually. Corrective actions for all SOPs are outlined in the written SOPs.
- Foodservice staff will be responsible for documenting any corrective actions taken while handling and preparing food as well as any actions taken while performing SOPs.

NOTE: Corrective actions in this example are based on standards established in the 2001 FDA Food Code (as amended August 29, 2003 in the Supplement to the 2001 Food Code).

Training:

- In addition to the corrective actions outlined in the SOPs, foodservice staff will be trained on a continuous basis to take corrective actions when necessary.
- Guidance on most common specific corrective actions will be listed in this food safety program and will be posted in an accessible location in the kitchen.

Corrective actions for common problems are attached.

*** Person responsible for foodservice management and operations in the school district.**

(SAMPLE: Food Safety Program Cont'd)

Corrective Actions

Event	**Corrective Action**	
Receiving temperature for refrigerated product is at 47º F	Reject product	
Temperature of hamburger patties after standard cooking time is 150º F	Continue cooking to 165 ºF for 15 seconds.	
Food service staff handles raw poultry and then begins to cut up raw fruit	Instruct staff to wash hands immediately, discard fruit that has been cut up	
Leftover chili placed in refrigerator is at 80º F after 1.5 hours	Immediately reheat chili to 165 ºF for 15 seconds, divide and place in shallow pans in refrigerator, loosely covered. Cool to 70 ºF within 2 hours or less, and to 41 ºF or less in an additional 4 hours. If these times and temperatures are not met, discard.	

Note: For the purpose of this sample document, only a few corrective actions have been described. In an actual food safety program, all applicable corrective actions should be documented and included in the written program.

(SAMPLE: Food Safety Program Cont'd)

RECORDKEEPING

DOCUMENTATION (RECORDS)	DOCUMENTATION SCHEDULE
Food Production Records	
End Point Cooking Temperature	Daily
Time and Temperature for Holding	Daily
Equipment Temperature Records	
Receiving Logs	Each delivery
Freezer Log	Daily
Cooler Log	Daily
Thermometer Calibration	Weekly (Minimum)
Storage Room Logs	Daily
Review Records	
Food Safety Checklist	Weekly
Manager's Checklist	Twice yearly
Training Logs	On-going
Corrective Action Records	As necessary

Staff Responsibility:

All foodservice staff will be held responsible for recordkeeping duties as assigned. Overall, the foodservice manager will be responsible for making sure that records are being taken and for filing records in the proper place.

Recordkeeping Procedure:

- All pertinent information on critical control points, time, temperature, and corrective actions will be kept on clip boards in the kitchen for ease of use.
- All applicable forms for daily records will be replaced on a weekly basis or sooner, if necessary.
- In the case of weekly records, replacement of forms will be on a monthly basis.
- All completed forms will be filed in the filing cabinet in the manager's office.
- The foodservice manager is responsible for making sure that all forms are updated, available for use, and filed properly after completion.
- The foodservice manager is also responsible for educating all foodservice personnel on the use and importance of recording critical information.

NOTE: For the purpose of this example, the recordkeeping logs may be viewed in Appendix IV Record Keeping Examples. In an actual food safety program, all recordkeeping logs used in the facility should be filed with the description of the program as well as in an accessible location for foodservice staff to get extra copies when necessary.

(SAMPLE: Food Safety Program Cont'd)

REVIEW OF THE SCHOOL FOOD SAFETY PROGRAM

The school food service manager will review the school food safety program at the beginning of each school year and when any significant changes occur in the operation. The attached checklist will be used for the review.

(SAMPLE: Food Safety Program Cont'd)

Food Safety Program Review Checklist

1. Documents to review
___ Standard Operating Procedures
___ Food Preparation Process Charts
___ Control Measures in the Process Approach (CCPs and SOPs)
___ Corrective Actions

2. Monitoring recordkeeping. Choose at random one week from the previous four.

Type of Record (SOP, CCP, Corrective Action, etc.)	Monitoring Frequency and Procedure (How often? Initialed and dated? Etc.)	Record Location (Where is record kept?)

2. **Describe the strengths or weaknesses with the current monitoring or recordkeeping methods.**

3. **Who is responsible for verifying that the required records are being completed and properly maintained?**

4. **Describe the training that has been provided to support the food safety program.**

5. **Do the managers and staff demonstrate knowledge of the plan?**

6. **Have there been any changes to the menu or operation (new equipment, etc.)?**

7. **Was the plan modified because of these changes?**

Appendix IV. (SAMPLES): Record Keeping

A. Food Safety Checklist
B. Receiving Log
C. Cooking and Reheating Temperature Log
D. Cooling Temperature Log
E. Damaged or Discarded Product Log
F. Refrigeration Log

FOOD SAFETY CHECKLIST

Date_____ Observer_____

Directions: Use this checklist daily to determine areas in your operations requiring corrective action. Record corrective action taken and keep completed records in a notebook for future reference.

PERSONAL HYGIENE

	Yes	No	Corrective Action
• Employees wear clean and proper uniform including shoes.----------	☐	☐	_____
• Effective hair restraints are properly worn.----------	☐	☐	_____
• Fingernails are short, unpolished, and clean (no artificial nails). ------	☐	☐	_____
• Jewelry is limited to a plain ring, such as a wedding band and a watch - no bracelets. ----------	☐	☐	_____
• Hands are washed properly, frequently, and at appropriate times.-----	☐	☐	_____
• Burns, wounds, sores or scabs, or splints and water-proof bandages on hands are bandaged and completely covered with a foodservice glove while handling food. ----------	☐	☐	_____
• Eating, drinking, chewing gum, smoking, or using tobacco are allowed only in designated areas away from preparation, service, storage, and ware washing areas. ----------	☐	☐	_____
• Employees use disposable tissues when coughing or sneezing and then immediately wash hands. ----------	☐	☐	_____
• Employees appear in good health.----------	☐	☐	_____
• Hand sinks are unobstructed, operational, and clean.----------	☐	☐	_____
• Hand sinks are stocked with soap, disposable towels, and warm water. ----------	☐	☐	_____
• A handwashing reminder sign is posted.----------	☐	☐	_____
• Employee restrooms are operational and clean.----------	☐	☐	_____

FOOD PREPARATION

	Yes	No	Corrective Action
• All food stored or prepared in facility is from approved sources.----	☐	☐	_____
• Food equipment utensils, and food contact surfaces are properly washed, rinsed, and sanitized before every use. ----------	☐	☐	_____
• Frozen food is thawed under refrigeration or in cold running water. ----------	☐	☐	_____
• Preparation is planned so ingredients are kept out of the temperature danger zone to the extent possible. ----------	☐	☐	_____
• Food is tasted using the proper procedure.----------	☐	☐	_____
• Procedures are in place to prevent cross-contamination.----------	☐	☐	_____

- Food is handled with suitable utensils, such as, single use gloves or tongs. ---------- ☐ ☐ _____
- Food is prepared in small batches to limit the time it is in the temperature danger zone. ---------- ☐ ☐ _____
- Clean reusable towels are used only for sanitizing equipment, surfaces and not for drying hands, utensils, or floor. ------ ---------- ☐ ☐ _____
- Food is cooked to the required safe internal temperature for the appropriate time. The temperature is tested with a calibrated food thermometer. ---------- ☐ ☐ _____
- The internal temperature of food being cooked is monitored and documented. ---------- ☐ ☐ _____

HOT HOLDING	**Yes**	**No**	**Corrective Action**
• Hot holding unit is clean.----------	☐	☐	_____
• Food is heated to the required safe internal temperature before placing in hot holding. Hot holding units are not used to reheat potentially hazardous foods. ----------	☐	☐	_____
• Hot holding unit is pre-heated before hot food is placed in unit.-----	☐	☐	_____
• Temperature of hot food being held is at or above 135 ˚F.----------	☐	☐	_____
• Food is protected from contamination.----------	☐	☐	_____

COLD HOLDING	**Yes**	**No**	**Corrective Action**
• Refrigerators are kept clean and organized.----------	☐	☐	_____
• Temperature of cold food being held is at or below 41 ˚F.----------	☐	☐	_____
• Food is protected from contamination.----------	☐	☐	_____

REFRIGERATOR, FREEZER, AND MILK COOLER	**Yes**	**No**	**Corrective Action**
• Thermometers are available and accurate.----------	☐	☐	_____
• Temperature is appropriate for pieces of equipment.----------	☐	☐	_____
• Food is stored 6 inches off floor or in walk-in cooling equipment.--	☐	☐	_____
• Refrigerator and freezer units are clean and neat.----------	☐	☐	_____
• Proper chilling procedures are used.----------	☐	☐	_____
• All food is properly wrapped, labeled, and dated.----------	☐	☐	_____
• The FIFO (First In, First Out) method of inventory management is used. ----------	☐	☐	_____
• Ambient air temperature of all refrigerators and freezers is monitored and documented at the beginning and end of each shift. ----------	☐	☐	_____

FOOD STORAGE AND DRY STORAGE	Yes	No	Corrective Action
• Temperatures of dry storage area is between 50 ˚F and 70 ˚F or State public health department requirement.	☐	☐	_____
• All food and paper supplies are stored 6 to 8 inches off the floor.	☐	☐	_____
• All food is labeled with name and received date.	☐	☐	_____
• Open bags of food are stored in containers with tight fitting lids and labeled with common name.	☐	☐	_____
• The FIFO (First In, First Out) method of inventory management is used.	☐	☐	_____
• There are no bulging or leaking canned goods.	☐	☐	_____
• Food is protected from contamination.	☐	☐	_____
• All food surfaces are clean.	☐	☐	_____
• Chemicals are clearly labeled and stored away from food and food related supplies.	☐	☐	_____
• There is a regular cleaning schedule for all food surfaces.	☐	☐	_____

CLEANING AND SANITIZING	Yes	No	Corrective Action
• Three-compartment sink is properly set up for ware washing.	☐	☐	_____
• Dishmachine is working properly (i.e. gauges and chemicals are at recommended levels).	☐	☐	_____
• Water is clean and free of grease and food particles.	☐	☐	_____
• Water temperatures are correct for wash and rinse.	☐	☐	_____
• If heat sanitizing, the utensils are allowed to remain immersed in 171 ˚F water for 30 seconds.	☐	☐	_____
• If using a chemical sanitizer, it is mixed correctly and a sanitizer strip is used to test chemical concentration.	☐	☐	_____
• Smallware and utensils are allowed to air dry.	☐	☐	_____
• Wiping cloths are stored in sanitizing solution while in use.	☐	☐	_____

UTENSILS AND EQUIPMENT	Yes	No	Corrective Action
• All small equipment and utensils, including cutting boards and knives, are cleaned and sanitized between uses.	☐	☐	_____
• Small equipment and utensils are washed, sanitized, and air-dried.	☐	☐	_____
• Work surfaces and utensils are clean.	☐	☐	_____

- Work surfaces are cleaned and sanitized between uses.---------- ☐ ☐ _____
- Thermometers are cleaned and sanitized after each use.---------- ☐ ☐ _____
- Thermometers are calibrated on a routine basis.---------- ☐ ☐ _____
- Can opener is clean.---------- ☐ ☐ _____
- Drawers and racks are clean.---------- ☐ ☐ _____
- Clean utensils are handled in a manner to prevent contamination of areas that will be in direct contact with food or a person's mouth.---- ☐ ☐ _____

LARGE EQUIPMENT	**Yes**	**No**	**Corrective Action**

- Food slicer is clean.---------- ☐ ☐ _____
- Food slicer is broken down, cleaned, and sanitized before and after every use.---------- ☐ ☐ _____
- Boxes, containers, and recyclables are removed from site.---------- ☐ ☐ _____
- Loading dock and area around dumpsters are clean and odor-free.-- ☐ ☐ _____
- Exhaust hood and filters are clean.---------- ☐ ☐ _____

GARBAGE STORAGE AND DISPOSAL	**Yes**	**No**	**Corrective Action**

- Kitchen garbage cans are clean and kept covered.---------- ☐ ☐ _____
- Garbage cans are emptied as necessary.---------- ☐ ☐ _____
- Boxes and containers are removed from site.---------- ☐ ☐ _____
- Loading dock and area around dumpster are clean.---------- ☐ ☐ _____
- Dumpsters are clean.---------- ☐ ☐ _____

PEST CONTROL	**Yes**	**No**	**Corrective Action**

- Outside doors have screens, are well-sealed, and are equipped with a self-closing device.---------- ☐ ☐ _____
- No evidence of pests is present.---------- ☐ ☐ _____
- There is a regular schedule of pest control by licensed pest control operator.---------- ☐ ☐ _____

Receiving Log

Instructions: Use this Log for deliveries or receiving foods from a centralized kitchen. Record any temperatures and corrective action taken on the Receiving Log. Foodservice manager will verify that foodservice employees are receiving products using the proper procedure by visually monitoring foodservice employees and receiving practices during the shift and reviewing the Receiving Log at the close of each day. The Receiving Log is kept on file for a minimum of one year.

Date	Time	Vendor or School	Product Name	Temperature	Corrective Action Taken	Initials/Date	Manager Initials/Date

Cooking and Reheating Temperature Log

Instructions: Record product name, time, the two (2) temperatures/times, and any corrective action taken on this form. Foodservice manager will verify that foodservice employees have taken the required cooking temperatures by visually monitoring foodservice employees and preparation procedures during the shift and reviewing, initialing, and dating this log at the close of each day. Maintain this log for a minimum of one year.

Date and Time		Food Item	Internal Temperature/ Time	Internal Temperature/ Time	Corrective Action Taken	Initials	Verified By/ Date

Cooling Log

Instructions: Record temperatures every hour during the cooling cycle. Record corrective actions, if applicable. If no foods are cooled on any working day, indicate "No Foods Cooled" in the **Food Item** column. Foodservice manager will verify that foodservice employees are cooling food properly by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating this log each working day. Maintain this log for a minimum of one year.

Date	Food Item	Time / Temp	Time / Temp	Time / Temp	Time / Temp	Time / Temp	Time / Temp	Corrective Actions Taken	Initials	Verified By/ Date

Damaged or Discarded Product Log

Instructions: Foodservice employees will record product name, quantity, action taken, and reason, initials, and date each time a food or food product is damaged and/or will be discarded. Foodservice manager will verify that foodservice employees are discarding damaged food properly by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating this log each working day. Maintain this log for a minimum of one year.

Product Name/ Brand/Company	Quantity	Action Taken (Hold, Return, Discard)	Reason	Initials/Date	Manager Initials/Date

Refrigeration Log

Instructions: A designated foodservice employee will record the location or description of holding unit, date, time, air temperature, corrective action, and initials on this log. Foodservice manager will verify that foodservice employees have taken the required temperatures by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating this log each working day. Maintain this log for a minimum of one year.

Location/ Unit Description	**Date**	**Time**	**Temperature**	**Corrective Action**	**Food Worker Initials**	**Manager Initials/ Date**

Appendix V. References and Resources

References

1. **Dietary Guidelines** www.healthierus.gov/dietary guidelines

2. **FDA Food Code** http://www.cfsan.fda.gov/~dms/fc01-sup.html

3. **USDA Temperature Rules** www.fsis.usda.gov/thermy

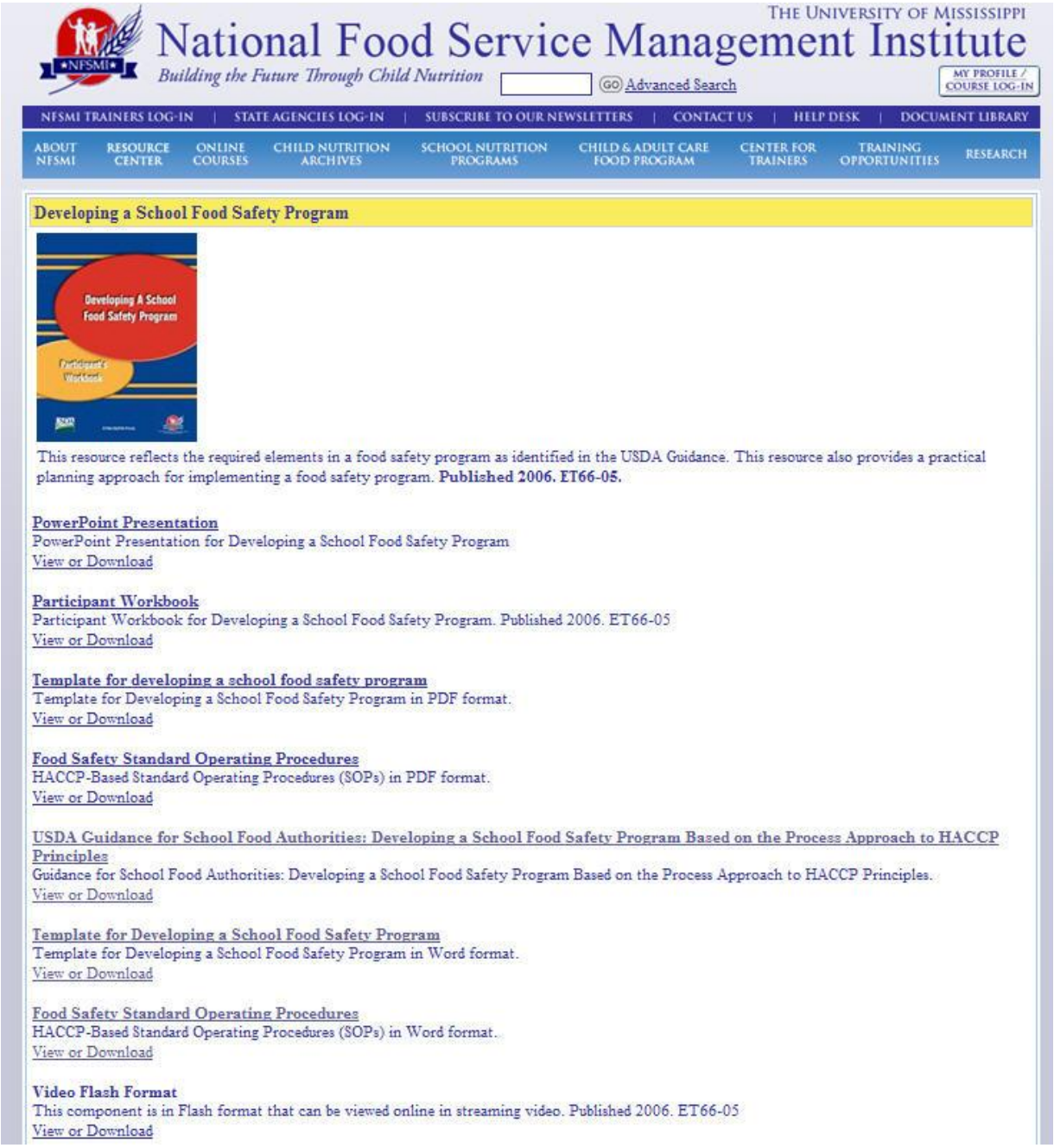
4. **National Food Service Institute** www.nfsmi.org

Resources

1. **USDA Recipes** http://www.nfsmi.org/Information/school_recipe_index_alpha.html

2. **Healthy School Meals Food Safety Resources** http://schoolmeals.nal.usda.gov/Safety/index.html

3. **For more information about this document contact:** Foodsafety@fns.usda.gov

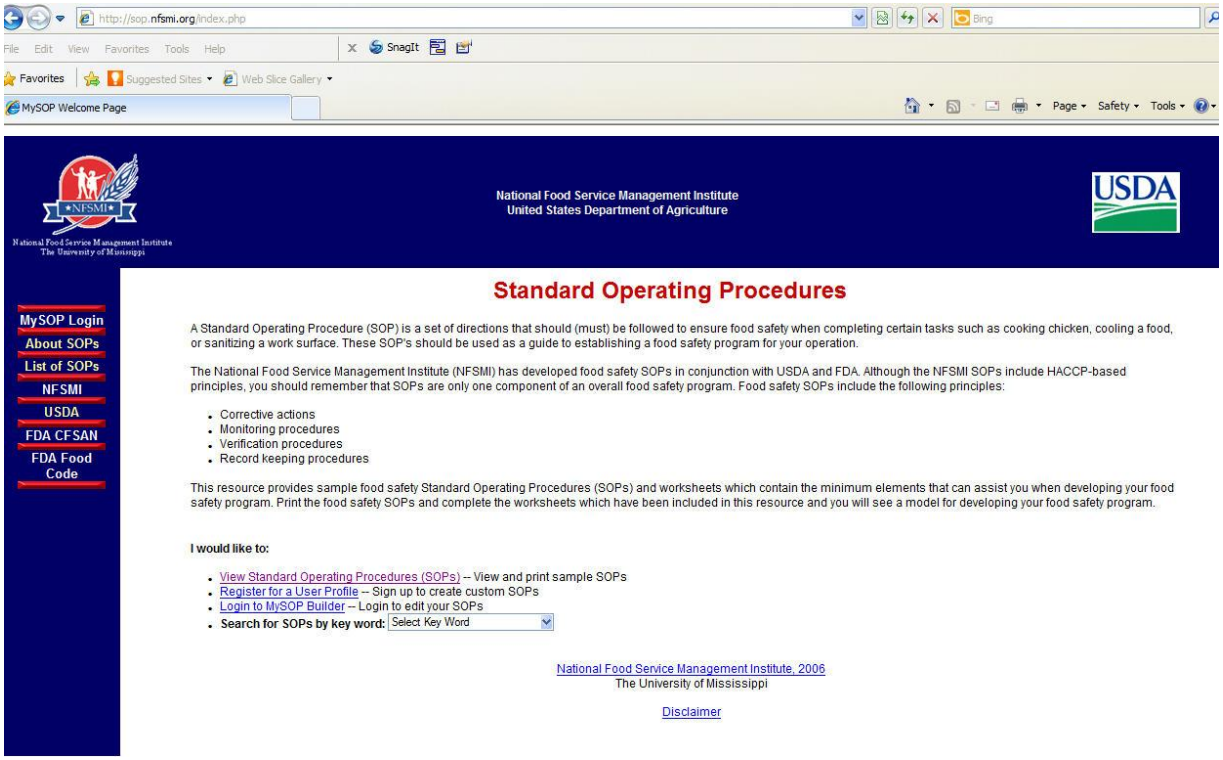


To access templates in both .pdf and Word formats, visit:

http://www.nfsmi.org/ResourceOverview.aspx?ID=57

For further Standard Operating Procedure templates, visit:

http://sop.nfsmi.org/index.php



Activity: Dividing Menu Items into Processes

Directions: Below is the lunch menu for one week from Sunflower Elementary. Look at each menu item and place it under the appropriate column in the table below.

Monday	Tuesday	Wednesday	Thursday	Friday
Hamburger on a WG bun Sweet Potato Puffs Broccoli with Cheese Fresh Apple Slices Skim Milk	Chicken Fajita Romaine Ribbons Shredded Cheese Fresh Salsa Corn Tortilla Chips Fresh Kiwi Halves Skim Milk	Korean BBQ Dippers Macaroni & Cheese WG Roll Mixed Vegetables Fresh Banana Skim Milk	Grilled Cheese Sandwich on WG Bread Lentil Soup Green Beans Cantaloupe Slices Skim Milk	Soft Shell Taco Romaine Ribbons Shredded Cheese Mexican Rice Refried Pinto Beans WG Corn Muffin Fresh Strawberries Skim Milk

Process 1 **No Cook/Cold**	**Process 2** **Same Day**	**Process 3** **Complex**	**Other** **No Cook/Room Temp**

Activity: Dividing Menu Items into Processes

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Process 1 **No Cook/Cold**	**Process 2** **Same Day**	**Process 3** **Complex**	**Other** **No Cook/Room Temp**
Fresh Apple Slices (if purchased)	*Hamburger on a WG Bun*	*Fresh Salsa (if purchased or made from scratch using cooked & cooled ingredients)*	*Corn Tortilla Chips*
Skim Milk	*Sweet Potato Puffs*		*WG Roll*
Romaine Ribbons (if cut)	*Broccoli with Cheese*		*Fresh Banana (whole)*
Shredded Cheese	*Chicken Fajita*		*WG Corn Muffin (if purchased)*
Fresh Salsa (if purchased or made from scratch using cold ingredients)	*Korean BBQ Dippers*		
Fresh Kiwi Halves	*Macaroni & Cheese*		
Cantaloupe Slices	*Mixed Vegetables*		
Fresh Strawberries	*Grilled Cheese Sandwich on WG Bread*		
	Lentil soup		
	Green Beans		
	Soft Shell Taco		
	Mexican Rice		
	Refried Pinto Beans		

Michigan Department of Education
Office of School Support Services
School Nutrition Programs

ACCOMMODATING CHILDREN WITH SPECIAL DIETARY NEEDS IN THE SCHOOL NUTRITION PROGRAMS

Confused about when food substitutions have to be made for a student? The federal regulations state that "schools shall make substitutions in foods . . . for students who are considered handicapped . . . and whose handicap restricts their diet. Schools may also make substitutions for non-handicapped students who are unable to consume the regular lunch (breakfast) because of medical or other special dietary needs."

In simple terms, this means that if a student has a documented disability that restricts their diet, the school foodservice department ***MUST*** make the substitutions as listed by a licensed physician on a medical statement form.

If, however, a request for food substitutions is made for a student without a documented disability, the school foodservice department ***MAY*** make the substitutions listed on the medical statement form signed by a recognized medical authority.

It is the responsibility of the parent/guardian making the request to submit a properly filled out and documented medical statement form.

Two Medical Statement Forms are available for use on the MDE website when special food substitutions are requested for a student. Directions for using the Medical Statement Forms and a definition of a handicapped person are also included along with the forms.

Definition of Handicapped Person
7 CFR Subtitle A, Section 15b.3 Definitions

(i) "Handicapped person" means any person who has a physical or mental impairment which substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment.

(j) "Physical or mental impairment" means (1) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: Neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genitourinary; hemic and lymphatic; skin; and endocrine; or (2) any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term "physical or mental impairment" includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech, and hearing impairment; cerebral palsy; epilepsy; muscular dystrophy; multiple sclerosis; cancer; heart disease; diabetes; mental retardation; emotional illness; and drug addiction and alcoholism.

(k) "Major life activities" means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working;

(l) "Has a record of such impairments' means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits on or more major life activities.

(m) "Is regarded as having an impairment" means (1) has a physical or mental impairment that does not substantially limit major life activities but that is treated by a recipient as constituting such a limitation; (2) has a physical or mental impairment that substantially limits major life activities only as a result of the attitudes of others towards such impairments, or (3) has none of the impairments defined in paragraph (j) of this section but is treated by a recipient as having such impairment.

Office of the Secretary, USDA

Please contact a School Meals Consultant at 517-373-3347 if any additional information is needed.

8/08

Michigan Department of Education
Office of School Support Services
School Nutrition Programs

ACCOMMODATING CHILDREN WITH SPECIAL DIETARY NEEDS

The following text is taken from the USDA Guidance Manual "*Accommodating Children with Special* Diet*ary Needs in the School Nutrition Programs*". It explains the school food service role in providing meals to students with special dietary needs. A complete copy of this USDA manual can be downloaded and printed from the following website:
http://www.fns.usda.gov/cnd/guidance/special_dietary_needs.pdf

Some highlights from the Guidance Manual:

GUIDANCE FOR ACCOMMODATING CHILDREN WITH SPECIAL DIETARY NEEDS IN THE SCHOOL NUTRITION PROGRAMS

I. INTRODUCTION

In recent years, we have seen increasing emphasis on the importance of ensuring that children with disabilities have the same opportunities as other children to receive an education and education-related benefits, such as school meals.

Congress first addressed this concern in *The Rehabilitation Act of 1973,* which prohibits discrimination against qualified persons with disabilities in the programs or activities of any agency of the federal government's executive branch or any organization receiving federal financial assistance.

Subsequently, Congress passed the *Education of the Handicapped Act,* (now, the *Individuals with Disabilities Education Act),* which requires that a free and appropriate public education be provided for children with disabilities, who are aged 3 through 21, and the *Americans with Disabilities Act,* a comprehensive law which broadens and extends civil rights protections for Americans with disabilities.

One effect of these laws has been an increase in the number of children with disabilities who are being educated in regular school programs. In some cases, the disability may prevent the child from eating meals prepared for the general school population.

The U.S. Department of Agriculture's (USDA) nondiscrimination regulation (7 CFR 15b), as well as the regulations governing the National School Lunch Program and School Breakfast Program, make it clear that substitutions to the regular meal must be made for children who are unable to eat school meals because of their disabilities, when that need is certified by a licensed physician.

In most cases, children with disabilities can be accommodated with little extra expense or involvement. The nature of the child's disability, the reason the disability prevents the child from eating the regular school meal, and the specific substitutions needed must be specified in a statement signed by a licensed physician. Often, the substitutions can be made relatively easily. There are situations, however, which may require additional equipment or specific technical training and expertise. When these instances occur, it is important that school food service managers and parent(s) be involved at the outset in preparations for the child's entrance into the school.

This guidance describes some of the factors which must be considered in the early phases of planning and suggests ways in which the school food service can interact with other responsible parties in the school and the community at large to serve children with disabilities.

The guidance is based on the policy guidelines outlined in the FNS Instruction *783-2,* Revision *2, Meal Substitutions for Medical or Other Special Dietary Reasons.*

Serving children with disabilities presents school food service staff with new challenges as well as rewards. This guidance presents information on how to handle situations that may arise and offers advice about such issues as funding and liability.

The guidance was prepared in consultation with the U.S. Department of Justice and the U.S. Department of Education and will be periodically updated to reflect new scientific information or new statutory and program guidelines.

II. DEFINITIONS OF DISABILITY AND OF OTHER SPECIAL DIETARY NEEDS

A. DISABILITY

Rehabilitation Act of 1973 and the *Americans with Disabilities Act*

Under Section 504 of the *Rehabilitation Act of* 1973, and the *Americans with Disabilities Act* (ADA) of 1990, a "person with a disability" means any person who has a physical or mental impairment which substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment.

The term "physical or mental impairment" includes many diseases and conditions, a few of which may be:

· orthopedic, visual, speech, and hearing impairments;

· cerebral palsy;

· epilepsy;

· muscular dystrophy;

· multiple sclerosis;

· cancer;

· heart disease;

· metabolic diseases, such as diabetes or phenylketonuria (PKU);

· food anaphylaxis (severe food allergy);

· mental retardation;

· emotional illness;

· drug addiction and alcoholism;

· specific learning disabilities;

· HIV disease; and tuberculosis.

Please refer to the Acts noted above for a more detailed explanation. Major life activities covered by this definition include caring for one's self, eating, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

Individuals with Disabilities Education Act

The term child with a "disability" under Part B of the Individuals *with Disabilities Education Act* (IDEA) means a child evaluated in accordance with IDEA as having one or more of the recognized thirteen disability categories and who, by reason thereof, needs special education and related services.

IDEA recognizes thirteen disability categories which establish a child's need for special education and related services.

These disabilities include:

· autism;

· deaf-blindness;

· deafness or other hearing impairments;

· mental retardation;

· orthopedic impairments;

· other health impairments due to chronic or acute health problems, such as asthma, diabetes, nephritis, sickle cell anemia, a heart condition, epilepsy, rheumatic fever, hemophilia, leukemia, lead poisoning, tuberculosis;

· emotional disturbance;

· specific learning disabilities;

· speech or language impairment;

· traumatic brain injury; and

· visual impairment; including blindness which adversely affects a child's educational performance, and

· multiple disabilities.

Attention deficit disorder or attention deficit hyperactivity disorder may fall under one of the thirteen categories. Classification depends upon the particular characteristics associated with the disorder and how the condition manifests itself in the student, which will determine the category.

The Individualized Education Program or IEP means a written statement for a child with a disability that is developed, reviewed, and revised in accordance with the IDEA and its implementing regulations. The IEP is the cornerstone of the student's educational program that contains the program of special education and related services to be provided to a child with a disability covered under the IDEA.

NOTE: Some states supplement the IEP with a written statement specifically designed to address a student's nutritional needs. Other states employ a "Health Care Plan" to address the nutritional needs of their students. For ease of reference, the term "IEP" is used to reflect the IEP as well as any written statement designating the required nutrition services.

When nutrition services are required under a child's IEP, school officials need to make sure that school food service staff is involved early on in decisions regarding special meals.

Physician's Statement for Children with Disabilities

USDA regulations 7 CFR Part 15b require substitutions or modifications in school meals for children whose disabilities restrict their diets. A child with a disability must be provided substitutions in foods when that need is supported by a statement signed by a licensed physician. The physician's statement must identify:

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

In Cases of Food Allergy

Generally, children with food allergies or intolerances do not have a disability as defined under either Section 504 of the Rehabilitation Act or Part B of IDEA, and the school food service may, but is not required to, make food substitutions for them.

However, when in the licensed physician's assessment, food allergies may result in severe, life-threatening (anaphylactic) reactions, the child's condition would meet the definition of "disability," and the substitutions prescribed by the licensed physician must be made.

B. OTHER SPECIAL DIETARY NEEDS

The school food service may make food substitutions, at their discretion, for individual children who do not have a disability, but who are medically certified as having a special medical or dietary need.

Such determinations are only made on a case-by-case basis. This provision covers those children who have food intolerances or allergies but do not have life-threatening reactions (anaphylactic reactions) when exposed to the food(s) to which they have problems.

Medical Statement for Children with Special Dietary Needs

Each special dietary request must be supported by a statement, which explains the food substitution that is requested. It must be signed by a recognized medical authority.

The medical statement must include:

- 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.

III. SCHOOL ISSUES

The school food service, like the other programs in the school, is responsible for ensuring that its benefits (meals) are made available to all children, including children with disabilities. This raises questions in a number of areas:

A. What are the responsibilities of the school food service?

B. Where can additional funds be obtained?

C. Who can provide more information and technical assistance?

SCHOOL FOOD SERVICE RESPONSIBILITIES

- School food service staff must make food substitutions or modifications for students with disabilities.
- Substitutions or modifications for children with disabilities must be based on a prescription written by a licensed physician.
- The school food service is encouraged, but not required, to provide food substitutions or modifications for children without disabilities with medically certified special dietary needs who are unable to eat.
- regular meals as prepared.
- Substitutions for children without disabilities, with medically certified special dietary needs must be based on a statement by a recognized medical authority.
- Under no circumstances are school food service staff to revise or change a diet prescription or medical order.
- For USDA's basic guidelines on meal substitutions and accessibility, see FNS Instruction *783-2,* Revision *2, Meal Substitutions for Medical or Other Special Dietary Reasons,* in **Appendix** A.
- It is important that all recommendations for accommodations or changes to existing diet orders be documented in writing to protect the school and minimize misunderstandings. Schools should retain copies of special, non-meal pattern diets on file for reviews.
- The diet orders do not need to be renewed on a yearly basis; however schools are encouraged to ensure that the diet orders reflect the current dietary needs of the child.

Providing Special Meals to Children with Disabilities

The school food service is required to offer special meals, at no additional cost, to children whose disability restricts their diet as defined in USDA's nondiscrimination regulations, 7 CFR Part 15b.

- If a child's IEP includes a nutrition component, the school should ensure that school food service managers are involved early on in decisions regarding special meals or modifications.

- The school food service is not required to provide meal services to children with disabilities when the meal service is not normally available to the general student body, unless a meal service is required under the child's IEP.

For example, if a school breakfast program is not offered, the school food service is not required to provide breakfast to the child with a disability, unless this is specified in the child's IEP.
However, if a student is receiving special education and has an IEP, and the IEP indicates that the child needs to be served breakfast at school, then the school is required to provide this meal to the child and may choose to have the school food service handle the responsibility. This is discussed in more detail in *Section V,* under Situation 2.

Menu Modifications for Children with Disabilities

Children with disabilities who require changes to the basic meal (such as special supplements or substitutions) are required to provide documentation with accompanying instructions from a licensed physician.

This is required to ensure that the modified meal is reimbursable, and to ensure that any meal modifications meet nutrition standards which are medically appropriate for the child.

Texture Modifications for Children with Disabilities

For children with disabilities who only require modifications in texture (such as chopped, ground or pureed foods), a licensed physician's written instructions indicating the appropriate food texture is recommended, but not required.

However, the State agency or school food authority may apply stricter guidelines, and require that the school keep on file a licensed physician's statement concerning needed modifications in food texture.

- In order to minimize the chance of misunderstandings, it is recommended that the school food service, at a minimum, maintain written instructions or guidance from a licensed physician regarding the texture modifications to be made. For children receiving special education, the texture modification should be included in the IEP.

- School food service staff must follow the instructions that have been prescribed by the licensed physician.

Serving the Special Dietary Needs of Children Without Disabilities

Children without disabilities, but with special dietary needs requiring food substitutions or modifications, may request that the school food service meet their special nutrition needs.

- The school food authority will decide these situations on a case-by-case basis. Documentation with accompanying information must be provided by a recognized medical authority.

- While school food authorities are encouraged to consult with recognized medical authorities, where appropriate, schools are not required to make modifications to meals based on food choices of a family or child regarding a healthful diet.

B. FUNDING SOURCES

Price of Meals

Meals must be served free or at a reduced price (a maximum of 40 cents for lunch and 30 cents for breakfast) to children who qualify for these benefits regardless of whether or not they have a disability.

Schools may not charge children with disabilities or with certified special dietary needs who require food substitutions or modifications more than they charge other children for program meals or snacks.

Incurring Additional Expenses

In most cases, children with disabilities can be accommodated with little extra expense or involvement. If additional expenses are incurred in providing food substitutions or modifications for children with special needs, generally the school food authority should be able to absorb the cost of making meal modifications or paying for the services of a registered dietician.

However, when the school food service has difficulty covering the additional cost, there are several alternative sources of funding which school food service managers, school administrators, parents or guardians, and teachers may consider. These sources include the school district's general fund and the additional funding sources listed below.

Any additional funding received by school food services for costs incurred in providing special meals must accrue to the nonprofit school food service account.

Directions for Using Medical Statement Forms

When a foodservice manager is asked to make a menu substitution for a student, it is the responsibility of the parent/guardian making the request to submit a properly filled out and documented medical statement form.

To assist foodservice managers in this process, staff of the School Nutrition Training and Programs Unit of the Michigan Department of Education, has developed Medical Statement Forms.

Two forms are available for use when special food substitutions are requested for a student. For a student with a handicap, the "Medical Statement for Student ***With*** a Disability" should be used. For a student without a handicap, the "Medical Statement for Student ***Without*** a Disability" should be used. Please contact a School Meals Consultant at 517-373-3347 if any additional information is needed.

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive

Alexandria, VA 22302-1500

DATE: November 12, 2009

MEMO CODE: SP 07-2010 CACFP 04-2010 SFSP 05-2010

SUBJECT: Q&As: Milk Substitution for Children with Medical or Special Dietary Needs (Non-Disability)

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Special Nutrition Programs
All States

This memorandum replaces SP 35-2009: Q&As Milk Substitution for Children with Medical or Special Dietary Needs, dated August 13, 2009. We have attached the complete set of questions and answers and highlighted the three additions.

Schools have the option to offer a nondairy milk substitute to a student with a medical or special dietary need other than a disability. The final rule *Fluid Milk Substitutions in the School Nutrition Programs* (73 FR 52903, September 12, 2008) addresses the substitution of fluid milk for children whose non-disabling allergies, culture, religion, or ethical beliefs preclude the consumption of cow's milk. The final rule sets nutrition standards for the nondairy milk substitutes that may be offered as part of the reimbursable meal. The attached Questions and Answers clarify various issues concerning the substitution of fluid milk in non-disability cases.

Note that this final rule does not apply in cases of disability. For a student with a recognized disability who cannot consume cow's milk, the school must omit or substitute fluid milk based on the written statement from a licensed physician.

Please distribute this information to your school food authorities as soon as possible. State agencies should contact their regional office if they have any questions.

Original Signed

Cynthia Long
Director
Child Nutrition Division

Attachment

Q&As: Fluid Milk Substitutions in the School Nutrition Programs

(Final rule published September 12, 2008; 73 FR 52903)

1. What are the main changes prompted by the final rule?

The most significant changes made by the final rule are:

- Allows parents/guardians to request a fluid milk substitute for a child with medical or special dietary needs other than a disability
- Establishes nutrient standards for nondairy beverages offered as fluid milk substitutes in the school meal programs

2. Does the final fluid milk substitution rule apply to the NSLP, SBP, afterschool snack service, and the seamless summer option?

Yes, the milk substitution provision is applicable to all institutions participating in these school meals programs. If a school or institution chooses to offer a milk substitute for a child with a medical or special dietary need other than a disability, the nondairy product that is offered as part of the reimbursable meal must meet the nutrient standards established by the final rule.

3. Does the final fluid milk substitution rule apply to the Special Milk Program (SMP)?

Yes. Although the final milk substitution rule does not specifically refer to the SMP, we are extending the final rule to this Program. We want to ensure that school-age children who cannot consume cow's milk due to a medical or special dietary need have access to a nondairy beverage that supplies the important nutrients found in cow's milk. Therefore, if an SMP operator decides to offer a milk substitute to a child with a medical or special dietary need other than a disability, the program operators must provide a nondairy beverage that meets the nutrition standards in the final rule in order to receive Federal reimbursement. Juice, water, or other beverages no longer qualify as a milk substitute and no reimbursement will be provided for them as an alternate beverage.

4. Does the final milk substitution rule apply to the Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP)?

No. Section 9(a)(2)(B) of the NSLA only addresses the substitution of milk in the school meals programs.

5. If a school is operating a preschool or summer program and claiming meals under CACFP or SFSP, may the school follow the milk substitution rule?

Yes. Schools that participate in CACFP or SFSP may follow the milk substitution rule.

6. Is a meal without fluid milk or an acceptable milk substitute reimbursable?

Under Offer v. Serve (OvS), a meal without fluid milk is reimbursable. If there is no OvS, a reimbursable meal must include milk or an acceptable milk substitute as described in this rule, except for a student with a disability (in which case this rule does not apply because the school must follow the licensed physician's written statement).

7. Must the school offer a milk substitute for a child with a medical or special dietary need at the request of a medical authority or a parent?

No, a school has discretion to offer a milk substitute as part of the reimbursable meal to a child with a medical or special dietary need other than a disability. However, FNS is concerned about the ability of children making this request to obtain the key nutrients found in fluid milk through school meals programs. We encourage schools to try to meet the dietary needs of these children by offering a nondairy beverage that meets the requirements of the final rule. If the school chooses to do so, it must accept a written request from a medical authority (as defined by the State) or a parent/legal guardian.

8. Must a school comply with a statement from a licensed physician or a medical authority indicating that a specific beverage (e.g., juice) must be provided in place of milk to a child with a medical or special dietary need other than a disability?

No, a school needs to comply with a statement from a licensed physician only when a milk substitution is necessary due to a disability. When the milk substitution request is due to a medical or special dietary need other than a disability, the school chooses whether to accommodate the student and selects the nondairy beverage(s) in accordance with the final milk substitution rule.

9. If a school chooses to offer milk substitutes for children with medical or special dietary needs, may it only accept written requests from medical authorities?

No, the school does not have the option to refuse a parent's request. Section 9(a)(2)(B) of the NSLA and program regulations at 7 CFR 210.10(g)(2)(ii)(B) allow a statement from a parent/guardian, as well as a medical authority.

10. What type of documentation must be submitted to the school to request a milk substitute for a child with a medical or special dietary need other than a disability?

The written request from the medical authority or the parent/guardian must identify the student's medical or other special dietary need that precludes the consumption of cow's milk. No other information is required.

11. Do the regulations prohibit a school food service operation from offering children with medical or special dietary needs a milk substitute that does not meet the nutrient standards in this rule?

The final milk substitution rule addresses the substitution of milk as part of the reimbursable school meal. However, if a meal includes a milk substitute that does not meet the requirements of this rule (e.g., juice) no reimbursement would be provided for that meal.

12. Is it necessary to offer a choice of acceptable milk substitutes?

No, a school may offer one or more acceptable milk substitutes for children with medical or special dietary needs.

13. What are the acceptable reasons for requesting a milk substitute for a student who does not have a recognized disability?

Section 9(a)(2)(B) of the National School Lunch Act does not specify the medical or special dietary needs that are covered by the milk substitution provision. Any reasonable request could be accepted. For example, a request due to a milk allergy, vegan diet, as well as religious, cultural or ethical reasons would be acceptable and could be accommodated. If a request only states that a child does not like milk, the student can be offered flavored milk instead of a milk substitute that meets the requirements of this rule.

14. Should lactose-free milk always be the substitute for a non-disabled student with lactose intolerance, even if the written statement indicates that water or juice should be provided?

Water or juice can no longer be offered as a fluid milk substitute for a student with medical or special dietary needs. For practical reasons, lactose-free milk should be the first choice for a student who has lactose intolerance. Lactose-free milk provides the same key nutrients found in regular cow's milk and is readily available nationwide. Furthermore, FNS allows lactose-free milk to be provided as part of the reimbursable meal without documentation. A nondairy beverage meeting the requirements of the final milk substitution rule could also be offered, but it is not necessary.

15. Is water an allowable substitute for milk and does it need to be fortified?

Water is not considered an acceptable substitute for fluid milk. Only a beverage meeting the nutrient standards at levels specified in the final rule may be substituted for fluid milk. (See also question 18)

16. May a school decline to offer an acceptable milk substitute to children with medical or special dietary needs, other than disabilities, due to cost?

Yes, a school has the choice to accommodate a milk substitution request from a child with medical or special dietary needs other than a disability. However, the NSLP and SBP seek to safeguard the well-being of all children, including those with special needs. We believe that accommodating the medical or special dietary needs of children helps to maintain student participation in the school meals programs. Because milk substitution requests are granted on a case-by-case basis and a school selects the acceptable nondairy beverage(s), we anticipate that in most cases the substitution could be accommodated without undue financial hardship. However, in some situations, cost may be a legitimate reason for declining to offer a milk substitute to a child with a medical or special dietary need.

17. May a school claim a meal that includes four food components (other than fluid milk) and beverage brought from home, as indicated by a medical authority or a licensed physician?

Under OvS, a meal without fluid milk can be reimbursable. If there is no OvS, a reimbursable meal for a child with a medical or special dietary need must include milk or an acceptable milk substitute provided by the school as part of a reimbursable meal. If the school does not offer an acceptable milk substitute for students without disabilities, the student has to take the fluid milk for the meal to be reimbursable.

If the student has a disability, the school can omit or substitute fluid milk based on the written statement from a licensed physician. For a student with a recognized disability, the meal may consist of only four components and a beverage from home, if so prescribed by a licensed physician.

18. Does a school have to accept milk substitution requests even if it is not offering a milk substitution for children with medical or special dietary needs?

If a school has decided not to offer a milk substitution for students with medical or special dietary needs, it should communicate this decision to all households at the beginning of the school year to minimize the number of written requests. We do not expect schools to keep documentation of non-disability milk substitution requests that are not being implemented.

19. Can an SFA continue to honor milk substitution requests for children without disabilities that were approved prior to this final rule and, thus, offer juice in place of fluid milk?

No. In SY 2008-2009, FNS temporarily allowed SFAs to honor accommodations granted under previous meal variation regulations because at that time there were no acceptable milk substitutes in the market. We understand that some acceptable products are currently available. Therefore, beginning in SY 2009-2010, SFAs that wish to offer a milk substitute for a student with a medical or special dietary need other than a disability must offer a beverage that meets the nutrient standards established in the final rule. This rule does not restrict the ability of schools to continue offering lactose-free milk as part of the reimbursable meal for children who have lactose intolerance.

20. How can a school determine what products meet the requirements of this final rule?

Because the Nutrition Facts Label nutrition label on food products does not list all the required nutrients (see below), the food service operation needs to request documentation from the product manufacturer to confirm the presence of all required nutrients at the proper level. The State Agency can provide guidance or assist with product selection.

Milk Substitute Nutrition Standards

Nutrient	Per Cup
Calcium	276 mg
Protein	8 g
Vitamin A	500 IU
Vitamin D	100 IU
Magnesium	24 mg
Phosphorus	222 mg
Potassium	349 mg
Riboflavin	.44 mg
Vitamin B-12	1.1 mcg

21. Does USDA maintain a list of acceptable products?

No, school food authorities (SFAs) are responsible for selecting and purchasing food products to be offered as part of the school meals programs. USDA does not evaluate, approve, or endorse any nondairy beverage intended to be offered as a milk substitute. We understand that availability of products meeting the nutrient standards in this rule varies across the country. SFAs may want to seek help from their State Agency to identify acceptable products or potential manufacturers.

22. Are the milk substitution requirements for the NSLP and the WIC food package the same?

Yes, the required nutrient standards are the same. Other requirements in the milk substitution rule, such as the written substitution request, do not apply to WIC.

23. Is FNS Instruction 783-2, Rev. 2, *Meal Substitutions for Medical or Other Special Dietary Reasons* still valid?

Yes, this Instruction, issued on October 14, 1994, is still current and applies to meal variations for children with and without disabilities. The final milk substitution rule establishes additional requirements that only apply to fluid milk substitution for children without disabilities.

24. May a school serve organic milk or milk with a label indicating it was produced from cows not treated with hormones?

Yes. Schools may routinely offer all students organic milk or milk with a label indicating it was produced from cows not treated with hormones. The requirement is for fluid milk, and milk labeled in this manner would meet the requirement.

25. Must a school honor a request to substitute milk with organic milk or milk with a label indicating it was produced from cows not treated with hormones?

No, the choice to purchase milk labeled in this manner is at the discretion of the school.

Milk Substitutes for Nondisabled Children

These requirements apply to accommodations for children without disabilities who cannot drink milk. School Food Authorities have the option to make this accommodation and offer an allowable fluid milk substitute for children without disabilities.

School Food Authorities choosing to offer a milk substitute as part of reimbursable meals for nondisabled children must provide products that meet the following USDA nutrition standards for fluid milk substitutes.

Nutrients per Cup (8 fluid ounces)
Calcium: 276 milligrams (mg)
Protein: 8 grams (g)
Vitamin A: 500 international units (IU)
Vitamin D: 100 IU
Magnesium: 24 mg
Phosphorus: 222 mg
Potassium: 349 mg
Riboflavin: 0.44 mg
Vitamin B-12: 1.1 micrograms (mcg)

Nondairy substitutes that do not meet these nutrition standards cannot be served as a part of a reimbursable meal.

Under Offer versus Serve (OVS), a meal without milk can be reimbursable.
If OVS is not available, a reimbursable meal for a student with a medical or special dietary need (non-disability) must include milk or an acceptable milk substitute provided by the school. If the school does not offer an acceptable milk substitute for students without disabilities, the students MUST take milk for the meal to be reimbursable.

To date (2012), the following milk substitute products have been identified that meet the USDA nutrition standards for fluid milk substitutes. Website links have been included to assist with locating where the products are sold in the state of Michigan.

USDA Nutrient Requirements per 8 oz	Calcium	Protein	Vitamin A	Vitamin D	Magnesium	Phosphorus	Potassium	Riboflavin	Vitamin B12
	276 mg	8 g	500 IU	100 IU	24 mg	222 mg	349 mg	0.44 mg	1.1 mcg
8th Continent Original Soymilk http://www.8thcontinent.com/product-finder/	300 mg	8 g	500 IU	100 IU	24 mg	250 mg	360 mg	0.51 mg	1.2 mcg
Kikkomon Pearl Smart Creamy Vanilla http://www.kikkomanusa.com/product_locator/	341 mg	9 g	578 IU	118 IU	80 mg	401 mg	410 mg	0.75 mg	1.58 mcg
Kikkomon Pearl Smart Chocolate http://www.kikkomanusa.com/product_locator/	388 mg	8 g	613 IU	110 IU	96 mg	456 mg	550 mg	0.77 mg	1.54 mcg
Pacific Natural Ultra Soy: Plain and Vanilla http://www.pacificfoods.com/where-to-buy	284 mg	10 g	500 IU	100 IU	52 mg	254 mg	381 mg	0.5 mg	1.47 mcg
Sunrich Naturals Soymilk Original and Vanilla http://www.sunrich.com/products.html	300 mg	8 g	500 IU	100 IU	40 mg	228 mg	360 mg	0.45 mg	1.1 mcg

Team Challenge Activity Questions Handout

Challenge 1
Question: 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 2
Question: 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 school breakfast program. Do you have to provide the meal to this student? Why or why not?

Challenge 3
Question: 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 4
Question: 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?

Challenge 5
Question: A child in your school has a documented life threatening food allergy that causes an anaphylactic reaction to peanuts. The mother requests that food service staff read all food labels for peanut ingredients to ensure a safe meal for her child. Do you have to accommodate the mother's request? Why or why not?

Challenge 6
Question: 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?

Challenge 7
Question: 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?

Challenge 8
Question: When a student has a non-disabling milk allergy, can juice or water be substituted for milk?

Challenge 9

Question: 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 10

Question: 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?

Team Challenge Activity Answers Handout

Challenge 1

Answer: No. Federal regulations state, "school districts must ensure that students with disabilities participate along with children without disabilities to the maximum extent appropriate to the needs of students with disabilities." However, if it is to a child's benefit to be served separately, then this accommodation can be made (USDA, 2001).

Challenge 2

Answer: No. If an IEP requires breakfast or a snack for a student with a disability but the school food service does not offer these programs to other students, school food service does not have to provide the meal or snack. But since providing breakfast is part of the IEP, the school does have to provide it and may ask the school food service to do it. USDA encourages school food service to work with the school staff to make these accommodations. Although such meals cannot be claimed for reimbursement, they are an allowable cost to school food service (USDA, 2001).

Challenge 3

Answer: Yes. If it is an order from a licensed physician and the child meets the definition for a disability, the accommodation must be made. Students cannot be charged extra for the additional quantities (USDA, 2001).

Challenge 4

Answer: Yes. A child with a disability must be accommodated regardless of the length of the disability. The child cannot be charged extra for the supplement but it is an allowable food service cost (USDA, 2001).

Challenge 5

Answer: Yes. A life threatening food allergy that causes an anaphylactic reaction is considered a disability because it can affect a major life activity, breathing. Thus, accommodations are mandated.

However, other allergies that do not cause anaphylaxis are not considered disabilities. The school food service director can make accommodations on a case-by-case basis as seems appropriate (USDA, 2001).

Challenge 6:
Answer: No. High cholesterol does not qualify as a disability. However, you can choose to make these accommodations if provided with a statement from a medical professional. In this case, the modification can be made simply by helping the student choose low-cholesterol foods from the variety of healthy options served in the cafeteria or by declining certain items (USDA, 2001).

Challenge 7:
Answer: No. School food service is not required to make accommodations based on an individual's views of a healthy diet (USDA, 2001).

Challenge 8:
Answer: No. Children with non-disabling milk allergies may only be offered a nondairy beverage that is nutritionally equivalent to fluid milk. Neither juice nor water is nutritionally equivalent to milk. However, if the milk allergy is a disability, a juice or water substitution written in the physician's orders must be followed (USDA, 2009).

Challenge 9:
Answer: No. Food service assistants are not qualified to make substitutions or modifications to a doctor's orders. All measures should be taken to keep important menu items in stock. You can also ask the doctor for a list of appropriate substitutions (USDA, 2001).

Challenge 10:
Answer: No. You must obtain additional written information from the physician concerning modifications or substitutions. You can work with the parents to obtain this additional information. The physician can also provide a referral to a registered dietitian who can provide this information (USDA, 2001).

Michigan Department of Education
Office of School Support Services
School Nutrition Programs

Medical Statement for Student *With* a Disability

Requires Special Foods in Child Nutrition Programs

Student's Name: _____ Age: _____ Grade: _____

Name of parent/guardian: _____ Phone Number: _____

Name of disability: _____

Explanation of why disability restricts child's diet: _____

_____

Major life activity affected by disability: _____

Foods to Omit:	Foods to Substitute:
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Other information regarding diet or feeding: (provide additional information below or on back of form or attach to this form).

_____

_____

_____

I certify that the above named student needs special school meals prepared as described above because of the student's disability or chronic medical condition.

_____
Physician's Signature
Office Phone Number: _____ Date: _____

Reviewed 8/2007

Michigan Department of Education
Office of School Support Services
School Nutrition Programs

Medical Statement for Student *Without* a Disability

Requesting Special Foods in Child Nutrition Programs

Student's Name: _____ Age: _____ Grade: _____

Name of parent/guardian: _____ Phone Number: _____

Description of child's medical or other special dietary needs that restrict the child's diet:

_____

_____

_____

Foods to Omit:	Foods to Substitute:
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Other information regarding diet or feeding: (provide additional information below or on back of form or attach to this form).

_____

_____

_____

_____

_____

Signature of Medical Authority

Office Phone Number: _____ Date: _____

Reviewed 8/2007

STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

MICHAEL P. FLANAGAN
SUPERINTENDENT OF
PUBLIC INSTRUCTION

FOOD SERVICE

ADMINISTRATIVE POLICY NO. 3
SCHOOL YEAR 2005-2006

SUBJECT: Local Wellness Policy – Required by the Child Nutrition Reauthorization Act of 2004 (PL 108-265)

DATE: July 25, 2005

On June 30, 2004, Congress passed Section 204 of Public Law 108-265, of the Child Nutrition and WIC Reauthorization Act of 2004. This law requires each local education agency participating in a program, authorized by the Richard B. Russell National School Lunch Act (42 U.S.C.1751 et seq.) or the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.), to establish a local school wellness policy by July 1, 2006.

At a minimum, the wellness policy must:

1) Include goals for nutrition education, physical activity, and other school-based activities that are designed to promote student wellness in a manner that the local education agency determines to be appropriate;
2) Include nutrition guidelines selected by the local education agency for all foods available on each school campus under the local education agency during the school day with the objectives of promoting student health and reducing childhood obesity;
3) Provide assurance that guidelines for reimbursable school meals shall not be less restrictive than regulations and guidance issued by the Secretary of Agriculture pursuant to subsections (a) and (b) of Section 10 of the Child Nutrition Act (42 U.S.C. 1779) and Section 9(f)(1) and 17(a) of the Richard B. Russell National School Lunch Act (42 U.S.C.1758(f)(1), 1766(a), as those regulations and guidance apply to schools;
4) Establish a plan for measuring implementation of the local wellness policy, including designation of one or more persons within the local education agency or at each school, as appropriate, charged with operational responsibility for ensuring that the school meets the local wellness policy; and
5) Involve parents, students, and representatives of the school food authority, the school board, school administrators, and the public in the development of the school wellness policy.

608 WEST ALLEGAN STREET • P.O. BOX 30008 • LANSING, MICHIGAN 48909
www.michigan.gov/mde • (517) 373-3324

Resources available to guide local wellness policy development:

1) Local Wellness Policy Web pages from USDA's Team Nutrition web site: www.fns.usda.gov/tn. Click "Local Wellness Policy."
2) Section 204 of Public Law 108-265: www.fns.usda.gov/tn/Healthy/108-265.pdf.
3) Healthy School Action Tool (HSAT) is an online assessment to help your school determine ways to create a healthier school environment. www.mihealthtools.org/healthyschools.asp.
4) Michigan Surgeon General's Healthy School Environment Recognition Program is designed to recognize and applaud Michigan schools that have taken significant steps to make their environments healthier: www.mihealthtools.org/healthyschools.asp.
5) Local Wellness Policy web pages from the School Nutrition Association web site: www.schoolnutrition.org.
6) Michigan Team Nutrition web site provides numerous resources designed to encourage students and their families to eat healthy and be active: www.tn.fcs.msue.msu.edu.

Please contact the School Meals Program at 517-373-3347, if you have any questions regarding this memo.

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA 22302-1500

DATE: July 8, 2011

MEMO CODE: SP 42 - 2011

SUBJECT: Child Nutrition Reauthorization 2010: Local School Wellness Policies

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Section 204 of the Healthy, Hunger-Free Kids Act of 2010 (the Act), Public Law 111-296, added Section 9A to the Richard B. Russell National School Lunch Act (NSLA) (42 U.S.C. 1758b), *Local School Wellness Policy Implementation*. The provisions set forth in Section 204 expand upon the previous local wellness policy requirement from the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Reauthorization Act of 2004 (Public Law 108-265).

This memorandum provides information on the new requirements for local wellness policies so that local educational agencies (LEAs) can begin reviewing their policies for the coming School Year 2011-2012, and begin moving forward on implementing the new requirements. The Food and Nutrition Service (FNS) anticipates issuing a proposed rule addressing the new requirements in Fall 2012 and providing technical assistance materials throughout the implementation of this provision. The public will have an opportunity to comment on the rule. FNS is hopeful that the operational experiences LEAs gain from implementing Section 204 will provide an informed body of comment on the proposed rule to be issued.

Summary of Section 204

Local wellness policies are an important tool for parents, LEAs and school districts to promote student wellness, prevent and reduce childhood obesity, and provide assurance that school meal nutrition guidelines meet the minimum Federal school meal standards. While many LEAs included plans for implementation in their written wellness policies as required by the Child Nutrition and WIC Reauthorization Act of 2004, they were not required to report on policy compliance and implementation; as a result, implementation and evaluation efforts were not monitored or conducted regularly. Section 204 of the Act

strengthens wellness policies by emphasizing ongoing implementation and assessment. This provision also supports a robust process at the community level, including the expansion of the team of collaborators participating in the wellness policy development to include more members from the community. This approach is intended to foster broad-based community support for the development and implementation of effective wellness policies.

The Act retains the requirement that each LEA participating in the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) establish, for all schools under its jurisdiction, a local school wellness policy. The Act incorporates new requirements for the content of the policies as well as general requirements for the development, implementation, dissemination, and assessment of the policies. These additional requirements are described below.

The Act also requires the Department of Agriculture (USDA) to promulgate regulations that provide the framework and guidelines for these local wellness policies, and to provide information and technical assistance to LEAs, school food authorities, and State agencies (SAs) for use in establishing healthy school environments that are intended to promote student health and wellness.

Elements of the Local Wellness Policy
As was previously required, local wellness policies must include, at a minimum, goals for nutrition education, physical activity, and other school-based activities that promote student wellness, as well as nutrition guidelines to promote student health and reduce childhood obesity for all foods available on each school campus. The Act added the requirement that local wellness policies include goals for nutrition promotion.

Local Discretion
As previously required, LEAs can determine the specific policies appropriate for the schools under their jurisdiction, provided that those policies address all of the required elements specified in the Act.

Public Involvement
LEAs are now required to permit teachers of physical education and school health professionals as well as parents, students, and representatives of the school food authority, the school board, school administrators, and the public to participate in the development of wellness policies. The Act also expanded the purpose of the team of collaborators beyond the development of a local wellness policy to also include the implementation of the local wellness policy with periodic review and updates.

Implementation, Periodic Assessment, and Public Updates
The Act requires LEAs to inform and update the public (including parents, students, and others in the community) about the content and implementation of the local wellness policies. LEAs are also required to measure periodically and make available to the public an assessment of the local wellness policy, including:

- The extent to which schools are in compliance with the local wellness policy;
- The extent to which the LEA's local wellness policy compares to model local school wellness policies; and
- The progress made in attaining the goals of the local wellness policy.

Finally, the Act requires LEAs to designate one or more LEA officials or school officials, as appropriate, to ensure that each school complies with the local school wellness policy.

Recommended Actions for School Year 2011-2012

Section 204 of the Act was effective as of October 1, 2010. Therefore, State agencies should ensure that LEAs are aware of the changes and begin reviewing their local wellness policies during School Year 2011-2012 and, to the extent practicable, begin moving forward on implementing the new requirements.

LEAs may find it helpful to consult the local wellness policy reference materials and sample policies on the FNS website at: http://www.fns.usda.gov/tn/healthy/wellnesspolicy.html. FNS will be updating these materials to reflect the new requirements; however these materials can still be a useful starting point for LEAs working to strengthen their local wellness policies to meet the requirements of the new law. FNS intends to describe the concept of *nutrition promotion* more clearly in future technical assistance materials, so that LEAs can add these goals to their local wellness policy.

There are a number of ways in which LEAs can implement the requirement for informing and updating the public about the content and implementation of the local wellness policies. Acceptable methods may include developing or disseminating printed or electronic materials to families of school children and other members of the school community at the beginning of the school year, and posting the local wellness policies and an assessment of its implementation on the district or school website. Whatever method is chosen, the information must be made available to the public by LEAs in an accessible, easily understood manner. For School Year 2011-2012, LEAs should be working toward developing a reasonable method to implement this requirement, with the goal of making the information public by the end of the school year.

Technical Assistance

Some LEAs will be able to implement several of the requirements of Section 204 relatively easily. However, we recognize that LEAs will need further guidance from FNS, particularly in the areas of model local wellness standards and assessing and evaluating local wellness policies. FNS is working with our partners at the Department of Health and Human Services/CDC and the Department of Education to provide technical assistance on local wellness policies for LEAs. The three agencies are working on a draft plan that will provide an overview of local wellness policies, identify gaps according to an environmental scan, and outline the technical assistance outcomes, services, and activities that the three agencies intend to address. In Summer 2011, this plan will be posted to the FNS website for the Healthy, Hunger-Free Kids Act (HHFKA): http://www.fns.usda.gov/cnd/Governance/Legislation/CNR_2010.htm. We will provide more information on a periodic basis as we move forward and develop resources.

The Centers for Disease Control and Prevention (CDC) has a number of resources to assist LEAs in designing, implementing, and promoting elements of local wellness policies, which are available on the CDC website: http://www.cdc.gov/HealthyYouth. In addition, CDC will soon be releasing the *School Health Guidelines to Promote Healthy Eating and Physical Activity Among Youth*, which presents evidence-based guidance for schools on how to promote healthy eating and physical activity in schools. The guidelines serve as the foundation for developing, implementing, and evaluating school-based healthy eating and physical activity policies and practices for K-12th grade students. Each of the nine guidelines is accompanied by a series of strategies to facilitate implementation. The Guidelines recognize that not all schools will be able to implement all guidelines and strategies; they represent a gold standard for schools to work toward. SAs and LEAs may look for links to these resources on the FNS HHFKA website this summer. To the extent practicable, LEAs should refer to these resources to assist them in adding additional elements to their existing local wellness policies.

Implementation Oversight and Proposed Rule

SAs must continue to ensure local wellness policies are in place when conducting administrative reviews. As needed, SAs should offer technical assistance to LEAs to assist them in identifying practical means of implementing the new requirements. Many requirements can be implemented easily, though others will require additional guidance.

FNS expects to publish a proposed rule on local wellness policies in Fall 2012. The public will have an opportunity to comment on the rule. We are hopeful that the operational experiences LEAs gain from implementing Section 204 will provide an informed body of comment on the proposed rule.

SAs should direct any questions concerning this guidance to their FNS Regional Office.

for Cynthia Long
Director
Child Nutrition Division

HealthierUS School Challenge:
Recognizing Excellence in Nutrition and Physical Activity

New Criteria Effective July 1, 2012

General Criteria	
Team Nutrition School	*All Award Levels* • School is enrolled as a Team Nutrition School.
School Meals Programs	*All Award Levels* • School participates in the School Breakfast Program (SBP) *and* National School Lunch Program (NSLP). • Reimbursable meals meet USDA nutrition standards. • All corrective actions from school's most recent State review of school meals program must be completed.
6 Cent Certification	*All Award Levels* • School Food Authority must be certified for 6 Cents.
Average Daily Participation (ADP; calculated based on attendance)	*Breakfast* • Elementary/Middle School o Bronze: No ADP requirement o Silver: 20% o Gold: 35% o Gold Award of Distinction: 35% • High School o Bronze: No ADP requirement o Silver: 15% o Gold: 25% o Gold Award of Distinction: 25%

General Criteria (cont.)	

Average Daily Participation (ADP; calculated based on attendance)	*Lunch*
	• Elementary/Middle School
	  o Bronze: No ADP requirement
	  o Silver: 60%
	  o Gold: 75%
	  o Gold Award of Distinction: 75%
	• High School
	  o Bronze: No ADP requirement
	  o Silver: 45%
	  o Gold: 65%
	  o Gold Award of Distinction: 65%

Breakfast Criteria	
Fruits*	*Bronze/Silver* • At least three different fruits* must be offered each week. • Dried fruit must have no added sweetener; canned fruit must be packed in juice or light syrup. • 100% juice can be counted as a fruit only once per week. • At least *one* fruit per week must be served fresh. *Gold/Gold Award of Distinction* • At least one different fruit* must be offered every day. • Dried fruit must have no added sweetener; canned fruit must be packed in juice or light syrup. • 100% juice can be counted as a fruit only once per week. • At least *two* fruits per week must be served fresh. *****Vegetables from the dark-green, red/orange, beans and peas (legumes) and "other vegetable" sub-groups may be substituted for fruits to meet the HUSSC fruit variety criteria for breakfast. The substitution must be consistent with meal pattern requirements as defined in §210.10(c)(2)(iii).
Grains	*Bronze/Silver* • 50% of grains offered weekly are whole grain-rich.* *Gold* • 70% of grains offered weekly are whole grain-rich.* *Gold Award of Distinction* • 100% of grains offered weekly are whole grain-rich.* * The definition of whole grain-rich is consistent with USDA policy guidance on new meal pattern requirements 7 CFR 210.10(c)(2)(iv).

Lunch Criteria	
Vegetables	*All Award Levels* • Dark-green, red and orange, and dry beans and peas must be offered in amounts equivalent to the meal pattern. *Bronze/Silver* • Offer *one* additional serving weekly from any of three vegetable sub-groups (dark-green, red and orange, dry beans and peas). *Gold/Gold Award of Distinction* • Offer *two* additional servings weekly from any of three vegetable sub-groups (dark-green, red and orange, dry beans and peas).
Fruits	*All Award Levels* • At least five different fruits must be offered each week. • Dried fruit must have no added sweetener; canned fruit must be packed in juice or light syrup. • 100% juice can be counted as a fruit only once per week. *Bronze* • One fruit per week must be served fresh. *Silver* • Two fruits per week must be served fresh. *Gold* • Three fruits per week must be served fresh. *Gold Award of Distinction:* • Four fruits per week must be served fresh.

Lunch Criteria (cont.)	
Grains	*Bronze/Silver* • Two-thirds of the grains offered over a week must be whole grain-rich.* *Gold/Gold Award of Distinction* • All grains offered must be whole grain-rich*. **Whole Grain-Rich Variety:** *Bronze/Silver/Gold* • At least three different types of whole grain-rich* foods offered during the week. *Gold Award of Distinction* • Same as Gold plus only one whole grain-rich* offering per week may be a grain-based dessert. * The definition of whole grain-rich is consistent with USDA policy guidance on new meal pattern requirements 7 CFR 210.10(c)(2)(iv).

Additional Criteria	

Nutrition Education	*Elementary School*
	• For all award levels, nutrition education is provided to all students in all grades.
	
	Middle School
	• Bronze/Silver
	  o Offered in at least one grade during the school year.
	• Gold/Gold Award of Distinction
	  o Offered in at least two grades.
	
	High School
	• For all award levels, nutrition education offered in two courses required for graduation.

Physical Education (PE)	*Elementary School*
	• Structured PE must be provided.
	  o Bronze/Silver: Minimum average of 45* minutes per week, throughout the school year.
	  o Gold: Minimum average of 90* minutes per week, throughout the school year.
	  o Gold Award of Distinction: Minimum average 150* minutes per week, throughout the school year.
	
	*Up to 20 minutes (Bronze/Silver) and 45 minutes (Gold/Gold Award of Distinction) of the PE requirement may be met by providing structured physical activity planned by a certified PE teacher and implemented by a classroom teacher or school administrator. All students must participate in the physical activities, which must be at least moderate-intensity and in increments of at least 10 minutes.
	
	Middle School
	• For all award levels, structured physical education offered to at least two grades.
	
	High School
	• For all award levels, structured physical education offered in at least two courses.

Additional Criteria (cont.)	
Physical Activity (PA)	*Elementary School* • For all award levels, physical activity opportunities are provided each day for all full day students (e.g., scheduled recess, walking clubs, bike clubs, intramural sports, a walk-to-school program). Such opportunities for physical activity are not the same as physical education (see the Physical Education section of this chart for a definition of physical education). • For all award levels, school reinforces physical activity/physical education messages by neither denying nor requiring physical activity as a means of punishment. *Middle and High School* • For all award levels, school provides students in all grades opportunities to participate in physical activity (e.g., intramural/interscholastic sports or activity clubs) throughout the school year. In addition, the school actively promotes participation in physical activity (in and out of school) to all students. • For all award levels, school reinforces physical activity/physical education messages by neither denying nor requiring physical activity as a means of punishment.
Local School Wellness Policy	*All Award Levels* • Submit a copy of the school's local wellness policy with the HUSSC Application, ***and*** provide documentation for the following local school wellness policy criteria: o List three ways your school is working to meet local wellness policy goals (e.g., creating specifications for vending machine foods to ensure they meet nutritional criteria, including local wellness policy goals in your school improvement plan, meetings of school wellness committee every other month). o Describe how parents, students, school administration and staff, and the community are involved in the implementation of the local wellness policy at your school.
Fundraising	*All Award Levels* • Primarily non-food items should be sold through school fundraising activities. However, if food items are sold during the school day, they must meet the HUSSC criteria for competitive foods.

Additional Criteria (cont.)	
Other Criteria for Excellence	*Bronze:* Must select at least two of the 20 options. *Silver:* Must select at least four of the 20 options. *Gold*: Must select at least six of the 20 options. *Gold Award of Distinction:* Must select at least eight of the 20 options. **Options:** *Program Outreach Excellence* • School implements innovative practices to increase SBP participation, such as Breakfast in the Classroom. • School operates an afterschool program that participates in the Afterschool Snack Program or at-risk afterschool meals component of the Child and Adult Care Food Program (CACFP). • If percentage of free or reduced students is 50% or more, Summer Food Service Program is available. *Physical Activity Excellence* • School sponsors a non-competitive afterschool physical activity program. • School actively supports and promotes walking or bicycling to and from school. • School offers at least 20 minutes of recess daily before lunch. *Nutrition Education Excellence* • School uses grade appropriate Team Nutrition curricula and lessons to teach nutrition education. • School has partnered with a chef in the *Chefs Move to Schools* Program. *Excellence in School and Community Involvement in Wellness Efforts* • Provides annual training to before and after school program staff on physical activity and nutrition. • All school staff receives annual training on wellness policies and ways to promote nutrition and physical activity. • School partners with one or more community groups to promote wellness. • Students have the opportunity to provide input on school food and physical activity options. • School informs public on amount of time allotted for lunch. Solicits input from students and community members on the amount of time that is adequate for lunch.

Other Criteria for Excellence	*School Food Service Excellence* • School Food Service Manager is a certified food handler (local or national certification) • School has a Farm to School initiative. • Smarter Lunchroom techniques are used to encourage fruit consumption: Fruit is displayed in 2 locations, one of which is near the cash register, on all lunch lines. Attractive displays, signage, and staff encouragement are used to draw attention to the fruit and encourage children to select them. • Smarter Lunchroom techniques are used to encourage vegetable consumption: Students are given the opportunity to provide input into vegetable offerings and to identify creative/descriptive names for the offerings. Creative/descriptive names are displayed with vegetables on the lunch line as well as on a poster or menu board outside the school cafeteria. • When offered, dark-green, red and orange vegetables and dry beans and peas are displayed first or most prominently among vegetable side dishes on the lunch line. • Smarter Lunchroom techniques are used to encourage consumption of dry beans and peas: Entrees that include dry beans or peas are displayed first or most prominently on the lunch line amongst other entrée items on at least 2 days. Dry bean and pea entrée items are given creative/descriptive names with student input. • Grab-and-go reimbursable meal options include dark-green, red and orange vegetables, and/or dry beans and peas at least one day per week.

Criteria for Competitive Foods/A La Carte/Second Servings (No Change)	

General Criteria for All Competitive Foods (including a la carte, seconds, in vending machines, school stores)	*Bronze/Silver*
	• When competitive foods are served:
	  o In the foodservice area
	  o Only during meal periods
	
	Gold/Gold Award of Distinction
	• When competitive foods are served:
	  o Anywhere in the school
	  o At any time during the school day (including meal periods)

Total Fat	*All Award Levels* • Calories from total fat must be at or below 35% (excluding nuts, seeds, nut butters and reduced-fat cheese).
Trans Fat	*All Award Levels* • “ *Trans* fat-free” less than 0.5g *trans* fat per serving.
Saturated Fat	*All Award Levels* • Calories from saturated fat must be below 10%. Reduced- fat cheese is exempt.
Sugar	*All Award Levels* • *Total* sugar must be at or below 35% by weight (includes naturally occurring and added sugars). • Fruits and vegetables are exempt.

Criteria for Competitive Foods/A La Carte/Second Servings (cont.)	
Sodium	*Bronze/Silver/Gold* • Must be at or below 480mg per side dish/non-entrée. • Must be at or below 600mg per main dish/entrée. *Gold Award of Distinction* • Must be at or below 200mg per side dish/non-entrée. • Must be at or below 480mg per main dish/entrée.
Portion Sizes	*All Award Levels* • Not to exceed the serving size of the food served in the National School Lunch/School Breakfast Programs; for other sales, the item package or container is not to exceed 200 calories.
Fruits and Non-Fried Vegetables	*All Award Levels* • Fruits and vegetables may be fresh, frozen, canned, or dried, and they must be found in Chapter 2 of the Food Buying Guide. • Dried fruit must have no added sweetener; canned fruit must be packed in juice or light syrup.
Milk	*All Award Levels* • Only low-fat (1% or less) or fat-free milk meeting State and local standards for pasteurized milk and/or USDA approved alternative dairy beverages may be offered daily.
Milk Serving Sizes	*All Award Levels* • Milk serving size is limited to 8-fluid ounces.

Criteria for Competitive Foods/A La Carte/Second Servings (cont.)	
Other Approved Beverages	*All Award Levels* • Fruit and vegetable juices: 100% full strength with no sweeteners or non-nutritive sweeteners. • Water (non-flavored, non-sweetened, non-carbonated, non-caffeinated, without non-nutritive sweeteners).
Juice Serving Size	*All Award Levels* • Juice serving size is limited to 6-fluid ounces for elementary and middle schools and 8-fluid ounces for high schools.