

## CHAPTER 10-FOOD SAFETY PROGRAM

All schools and RCCIs participating in the National School Lunch Program and the School Breakfast Program must have a written food safety program based on Hazard Analysis Critical Control Points (HACCP) principles. ARDHS has developed a sample plan based on HACCP principles that can be modified to meet the requirements of the local food safety requirements. SFAs can request the prototype plan from the School Nutrition Programs Unit.

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.

### 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). This plan is designed to 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. Schools should identify Critical Control Points (CCPs) and implement measures to control the occurrence or introduction of specific hazards. Developing and implementing SOPs will control nonspecific hazards.

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. Schools may request the guidance *Writing a Food Safety Plan for Schools* to help school food authorities develop an overall school food safety program using the HACCP principles.

### HACCP

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. USDA requires SFAs to use the Process Approach to HACCP because it gives schools the flexibility to create a food safety program specific to the local food service operation. The Food and Drug Administration (FDA) originally developed the Process Approach for retail food establishments. The Process Approach groups food preparation into three broad categories based on how many times each menu item moves through the temperature danger zone. The SNP guidance material provides a modified version of the Process Approach to make it practical for your school foodservice operation.

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 you ensure the safety of the school meals served to children in your school nutrition program.

### FOOD PROCESS APPROACH

A HACCP requirement is the process approach for preparing foods. These categories are: **Process #1: No Cook**, food items meant to be kept cold from preparation through service; **Process #2: Same Day Service**, food items meant to be prepared hot and served hot the same day; and **Process #3: Complex Food Preparation**, food items meant to be prepared hot and served cooled, or possibly reheated. You will need to put each menu item (recipe) into one of the three categories and then keep it hot (or cold) while it is being stored, prepared, transported, held, and served.

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. After the food safety program is implemented, staff should review process at least once a month to ensure it is effective. Each year, the school should review the entire program to incorporate any changes, such as new menu items, new equipment, changes in staff, and remodeling.

### REQUIREMENTS OF A SCHOOL FOOD SAFETY PROGRAM

In order to meet the USDA standard requirements for implementing a food safety program, Schools and RCCIs must include the following elements:

1. Documented Standard Operating Procedures (SOPs)
  - SOPs serve as a basic food safety foundation and to control hazards not outlined specifically in the HACCP plan. SOPs outline the proper procedures for controlling and preventing critical hazards during the food flow process.
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

To assist schools in complying with these the food safety requirements, **ARDHS, School Nutrition Programs provides a guideline for developing an effective food safety plan, along with sample language for a policy.** This guidance adopts language taken from the adapted from: U.S. Department of Agriculture, Food and Nutrition Service. (June 2005). *Guidance for School Food Authorities: Developing a School Food Service Program Based on the Process Approach to HACCP Principles*. The USDA website is available at <http://www.fns.usda.gov/cnd/lunch/Downloadable/HACCPGuidance.pdf>.

## **FOOD SAFETY REVIEWS**

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.

## **HEALTH INSPECTIONS**

According to section 111 of the Child Nutrition and WIC Reauthorization Act of 2004 schools and RCCIs participating in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are required to increase the number of food safety inspections from the one inspection currently required to two inspections per year. Section 111 also requires schools and RCCIs to post that the most recent food safety inspection report in a place visible to the public. Schools and RCCIs must also release the report to the public upon request.

If a school or RCCI is does not receive two inspections a year, it must contact the local health department and request an inspection. Document the all requests and follow-up attempts to get health inspections completed. Call or use the letter on page 4 of this Chapter to contact the local health department.

Each year, SFAs are required to submit a report to ARDHS listing the number of health inspections completed in the previous year. Complete the form on page 5 and submit to ARDHS by September 1.

### **Health Inspection Requirements**

- Contact Health Department and request health inspections if not scheduled
- Document your request
- If the local health department is unable or will not conduct two reviews, document the reason.
- Post your most current health inspection for public view
- Submit the ARDHS report to SA by September 1 of the following year

**LETTER REQUESTING A HEALTH INSPECTION****ATTACH LETTERHEAD**

Date:

To: Local Health Department

Fax:

From: \_\_\_\_\_

Address: \_\_\_\_\_

According to section 111 of the Child Nutrition and WIC Reauthorization Act of 2004 schools and RCCIs participating in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are required to increase the number of food safety inspections from the one inspection currently required to two inspections per year. Schools are required to have inspections of all food preparation-service sites and service-only sites. Section 111 also requires schools and RCCIs to post that the most recent food safety inspection report in a place visible to the public. Schools and RCCIs must also release the report to the public upon request.

At this time, the local health department has completed \_\_\_\_\_ inspections at our facility for this school year. To schedule an on-site inspection with our facility, please contact my office at \_\_\_\_\_.

If you are unable to complete two inspections for the school year, please provide written notification indicating why two inspections cannot be completed in the current year, so that we may forward this information to the ARDHS, School Nutrition Program.

\_\_\_\_\_  
Name of School Official

**Health Inspection Report for Program Year \_\_\_\_\_**

Name of School Food Authority: \_\_\_\_\_

Agreement Number: \_\_\_\_\_

Number of food service sites: \_\_\_\_\_

To comply with the Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265), schools and RCCIs participating in the School Nutrition Program must:

1. Have at least two health inspections conducted for each preparation/food service site, each program year. A program year is between the dates of July 1 to June 30. The inspections must be conducted by the state or local health department. Schools must notify the health department of the requirement.
2. Post in a public location the most recent food safety inspection. The reports must be available to the public upon request.
3. Provide reports for review during on-site visits and administrative reviews or as requested by ARDHS and USDA.
4. Place a checkmark next to the number of health inspections received:

Zero (0) \_\_\_\_

One (1) \_\_\_\_

Two (2) \_\_\_\_

More than two \_\_\_\_\_

How many? \_\_\_\_\_

5. For sites with less than two health inspections:

Did you contact the local health inspector and request an inspection?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, did you document your attempt, who you notified, and reason given for not completing two inspections? Yes \_\_\_\_\_ No \_\_\_\_\_

The annual deadline to report is September 1 for health inspections conducted in the prior program year (July 1 to June 30).

Submit this report to: ARDHS, School Nutrition Programs

PO Box 1437, slot 155, Little Rock, AR 72203-1437 or fax to:  
501-682-2334

If you have questions, you may call the School Nutrition Programs Office at 501-682-8869.