



STATE OF CONNECTICUT

DEPARTMENT OF EDUCATION



TO: Sponsors of the National School Lunch and School Breakfast Programs

FROM: John Frassinelli, Chief
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: May 30, 2013

SUBJECT: **Operational Memorandum #33-13**
Enhancing the School Food Safety Program Frequently Asked Questions

Attached are Questions and Answers (QAs) regarding the school food safety requirements for schools participating in Food and Nutrition Service (FNS) Child Nutrition Programs. The QAs provide additional clarification regarding the enhancements to the school food safety program. The Healthy, Hunger-Free Kids Act of 2010 (the Act), Public Law 111-296, strengthens the existing food safety requirements in the National School Lunch Program (NSLP), School Breakfast Program (SBP) and all other 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. The 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, Special Milk, the Fresh Fruit and Vegetable Program and afterschool snack or supper programs.

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

Questions may be directed to:

COUNTY ASSIGNMENTS	CONSULTANT
Litchfield County New London County	Fionnuala Brown fionnuala.brown@ct.gov 860-807-2129
Fairfield County Middlesex County (towns/cities beginning with C-E) New Haven County (towns/cities beginning with A-M)	Jackie Schipke jackie.schipke@ct.gov 860-807-2123
Middlesex County (towns/cities beginning with F-W) Tolland County Windham County	Susan Alston susan.alston@ct.gov 860-807-2081
Hartford County New Haven County (towns/cities beginning with N-W)	Teri Dandeneau teri.dandeneau@ct.gov 860-807-2079

JF:tdd

Attachment

Enhancing the School Food Safety Program
Frequently Asked Questions (FAQ)
Attachment to OM 33-13

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

<http://www.fns.usda.gov/fns/safety/pdf/HACCPGuidance.pdf>

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

1. Which FNS Child Nutrition Programs are included in the expanded Healthy Hunger-Free Kids Act (HHFKA) food safety requirement?

The following FNS Child Nutrition Programs are included in the expanded HHFKA food safety requirement:

- National School Lunch Program (NSLP) (including Seamless Summer Option);
- School Breakfast Program;
- Fresh Fruit and Vegetable Program;
- NSLP Afterschool Snack Program;
- Special Milk Program operated by schools;
- Summer Food Service Program operated by schools; and
- Child and Adult Care Food Program operated by schools.

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

2. Which locations are affected by the new requirement?

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

Also included in this new requirement are warehouses that store foods for the FNS Child Nutrition Programs and are under the control of the School Food Authority. The National Food Service Management Institute (NFSMI) developed sample SOPs that relate to warehouse activities. Just click on the topics below and it will take you to the Web site:

- [Receiving Deliveries](#)
- [Preventing Cross-Contamination during Storage and Preparation](#)
- [Transporting Food to Remote Sites](#)
- [Holding Hot and Cold Potentially Hazardous Foods](#)

Enhancing the School Food Safety Program
Frequently Asked Questions (FAQ)
Attachment to OM 33-13

- [Cleaning and Sanitizing Food Contact Surfaces](#)

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

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

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

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

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

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

- Maintain time and temperature control. Remember that potentially hazardous foods must be kept out of the temperature danger zone. Cold foods must be held at an internal temperature of 41 degrees Fahrenheit or below. Hot foods must be held at an internal temperature of 135 degrees Fahrenheit or above.
- Prevent cross contamination. For example, use serving utensils or single-use disposable gloves when serving students; or portion and wrap items before service.
- Clean and sanitize food contact surfaces, including desks and tables in classrooms. Refer to NFSMI's sample SOPs for more information on cleaning and sanitizing food contact surfaces:
<http://sop.nfsmi.org/HACCPBasedSOPs/CleaningandSanitizingFoodContactSurfaces.pdf>
- Encourage school volunteers, and students to wash their hands before and after service. For recommended hand washing procedures, refer to question eight.
- Monitor food storage conditions, such as temperature, cleanliness, etc., if food is stored in locations outside of the kitchen or cafeteria.
- Avoid potential pest problems by removing all leftover food and food waste from classrooms, or other locations, immediately after service.

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

The following items are examples of strategies that you can use to manage food safety when food is served by other school staff or volunteers:

**Enhancing the School Food Safety Program
Frequently Asked Questions (FAQ)
Attachment to OM 33-13**

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

6. Can leftover food be saved and served again?

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

The following suggestions may help you limit the amount of leftovers:

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

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

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

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

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

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

**Enhancing the School Food Safety Program
Frequently Asked Questions (FAQ)
Attachment to OM 33-13**

The CDC recommends the following procedures for proper hand washing:

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

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

www.cdc.gov/handwashing

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

Many of the SOPs posted on the NFSMI's Web site (<http://sop.nfsmi.org/>) will help you meet the requirement, and already may be in place in your operation. Related SOPs include:

1. Cleaning and Sanitizing Food Contact Surfaces.
2. Holding Hot and Cold Potentially Hazardous Foods.
3. Personal Hygiene.
4. Preventing Contamination at Self-Service Bars Serving Food.
5. Transporting Food to Remote Sites (Satellite Kitchens).
6. Using and Calibrating Thermometers.
7. Handling Ready-to-Eat Foods.
8. Washing Fruits and Vegetables.
9. Washing Hands.

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