

Food Safety/Hazard Analysis and Critical Control Point (HACCP) System

History

- 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 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 HACCP principles and conform to guidance issued by USDA. All SFAs must have had a fully implemented food safety program no later than the end of the 2005-2006 school year. (Reference USDA Guidance on Developing a School Food Safety Program Based on the Process Approach to HACCP Principles—June 2005).
- 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 production process—receiving, storing, preparing, cooking, cooling, reheating, holding, assembling, packaging, transporting, and serving. The purpose of a school food safety program is to ensure the delivery of safe foods to children in the school meals program by controlling hazards that may occur or be introduced into foods anywhere along the flow of the food from receiving to service (food flow).
- 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 CCPs and implementing measures to control the occurrence or introduction of those hazards. Nonspecific hazards are controlled by developing and implementing Standard Operating Procedures (SOPs).
- The Healthy, Hunger-Free Kids Act of 2010 (the Act), Public Law 111-296, strengthens the existing food safety requirements in the NSLP, 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. (Reference: USDA Policy Memo SP-37-2011)
- Section 302 of the Act amended 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 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 the Special Milk Program (SMP), the Fresh Fruit and Vegetable Program (FFVP), and After-School Snack or Supper Programs (ASSP).

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About Epic Charters Schools

- Epic Charters contracts with a FSMC that provides reimbursable pre-packaged meals and is a non-food prep site school.
- Epic is committed to ensuring all safety guidelines are being met to meet USDA/Child Nutrition guidelines and for the safety of the students and employees.

Key Points

- Three main essential points will be focused: sanitation, temperature control, and Standard Operating Procedures (SOPs).
- All food preparation areas will be clean and sanitary, such as workers' hands, utensils, and food contact surfaces. Overall, avoiding cross contamination.
- Temperature controls will be maintained keeping cold foods cold and hot foods hot. Cooking to proper temperatures and hold at proper temperatures, and be sure to record those temperatures. A basic, properly calibrated food thermometer (digital or dial) will be used to check for proper temperatures.
- 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.

General Safety for all Personnel

- Contact with ready-to-eat (RTE) foods is prohibited. Chemicals will be stored away from food and food-related supplies.
- Hand washing after restroom use, sneezing, coughing, or after performing any cleaning activity is re required for every person.
- Employees with any illness will be restricted or excluded from food production or preparation areas.

Product procurement

- Epic will follow recommendations for selecting vendors such as those found in state distributing agency vendor certification procedures and buyer product specifications.

Receiving

- All cans with swollen sides or ends, flawed seals and seams, rust or dents will be rejected. Perishable foods will be placed into the refrigerator or freezer immediately.

Storing

- All food and paper supplies will be stored 6 to 8 inches off the floor. All food will be labeled with name of the school and delivery date.

Transporting

- Transfer carts will be preheated prior to use.
- Transport travel time will be limited to a maximum of 2 hours.

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Holding

- Hot foods will be maintained hot (above 135 oF) and cold foods will be maintained cold (below 41 oF).

Preparation

- Food will not be allowed in the “danger zone” (between 41°F and 135°F) for more than 4 hours.
- All food will be handled with utensils; clean, gloved hands; or clean hands. (Bare hand contact with food during preparation should be limited. Bare hand contact with RTE foods is prohibited.)

Cleaning/sanitizing

- Clean water, free of grease and food particles will be used.
- Wiping cloths will be maintained in sanitizing solution while cleaning.

Cooking and documenting temperatures

- All temperatures will be recorded (date, time, etc.) when they are taken.
- Only a clean and sanitized thermometer will be used when taking internal temperatures of foods.

Cooling

- The “cool rapidly” method will be used by storing food in small batches in individual containers; the cover will be placed loosely so that heat can escape quickly.
- Cold foods will be maintained cold by pre-chilling ingredients for salads.

Reheating

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

Date Marking Ready-to-Eat, Potentially Hazardous Food

- Ensure appropriate rotation of ready-to-eat food to prevent or reduce foodborne illness from *Listeria monocytogenes*.
- This procedure applies to foodservice employees who prepares, stores, or serve food.
- 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, 5/26/17, 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.
- Label any processed, ready-to-eat, potentially hazardous foods when opened, if they are to be held for more than 24 hours.
- Refrigerate all ready-to-eat, potentially hazardous foods at 41°F or below.

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- Serve or discard refrigerated, ready-to-eat, potentially hazardous foods within 7 days.
- Indicate with a separate label the date prepared, the date frozen, and the date thawed of any refrigerated, ready-to-eat, potentially hazardous foods.
- Follow state and local public health requirements.
- 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.
- Foods that are not date marked or that exceed the 7-day time period will be discarded.

Receiving Deliveries

- Ensure that all food is received fresh and safe when it enters the food service operation, and to transfer food to proper storage as quickly as possible.
- Schedule deliveries to arrive at designated times during operational hours.
- Post the delivery schedule including the names of vendors, days and times of deliveries, and drivers' names.
- Organize freezer and refrigeration space, loading docks, and store rooms before deliveries.
- Gather product specification lists and purchase orders, temperature logs, calibrated thermometers, pens, flashlights, and clean loading carts before deliveries.
- Keep receiving area clean and well lighted.
- Do not touch ready-to-eat foods with bare hands.
- Determine whether foods will be marked with the date of arrival or the "use-by" date and mark accordingly upon receipt.
- Compare delivery invoice against products ordered and products delivered.
- Transfer foods to their appropriate locations as quickly as possible.
- 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.
- For packaged products, insert a food thermometer between two packages being careful not to puncture the wrapper. If the temperature exceeds 41°F, it may be necessary to take the internal temperature before accepting the product.
- Check dates of milk, eggs, and other perishable goods to ensure safety and quality.
- Check the integrity of food packaging.
- Check the cleanliness of crates and other shipping containers before accepting products. Reject foods that are shipped in dirty crates.
- Reject the following: frozen foods with signs of previous thawing, cans that have signs of deterioration – swollen sides or ends, flawed seals or seams, dents, or rust, punctured packages, expired foods, foods that are out of safe temperature zone or deemed unacceptable by the established rejection policy.

Using Suitable Utensils When Handling Ready-to-Eat Foods

- Prevent foodborne illness due to hand-to-food cross-contamination.
- This procedure applies to foodservice employees who prepare, handle, or serve food.
- 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.

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- Do not use bare hands to handle ready-to-eat foods at any time unless washing fruits and vegetables.
- 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, 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.

Washing Hands

- To prevent foodborne illness caused by contaminated hands.
- Train any individual who prepares or serves food on proper handwashing. Training may include viewing a handwashing video and demonstrating proper handwashing procedure.
- Post handwashing signs or posters in a language understood by all foodservice staff near all handwashing sinks, in food preparation areas, and restrooms.
- Use designated handwashing sinks for handwashing only. Do not use food preparation, utility, and dishwashing sinks for handwashing.
- 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.
- Keep handwashing sinks accessible anytime employees are present. 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
- Wet hands and forearms with warm, running water (at least 100°F) 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.
- Follow FDA recommendations when using hand sanitizers. These recommendations are listed below.
 - 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.

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- 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.