

USDA Administrative Review: Food Safety

On-Site Questions	
SFA Level Questions:	
<p>Does the SFA have a district-wide written Food Safety Plan that applies to all schools?</p> <p>Note: If the SFA does not have a district-wide written Food Safety plan that applies to all schools then answer question 1401 for the school-level.</p>	
1400.	<p>a. Does the written food safety plan contain the required elements?</p> <p>b. <u>Was a copy of the written food safety plan available at each school? If no, explain.</u></p> <p>Tips:</p> <p>The school food authority must develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5).</p> <p>Does the plan contain:</p> <ul style="list-style-type: none"> • Standard Operating Procedures • Menu items grouped according to process categories • Critical Control Points & Critical Limits • Monitoring Procedures • Corrective Action Procedures • Recordkeeping Procedures • Periodic Program Review & Revision <p>Resources:</p> <ul style="list-style-type: none"> • CDE School Nutrition Food Safety Plan Template: https://www.cde.state.co.us/nutrition/ensure-food-safety#foodsafetyplan • Developing a School Food Safety Program Based on the Process Approach to HACCP Principles: https://www.fns.usda.gov/ofs/developing-school-food-safety-program-based-process-approach-haccp • Institute of Child Nutrition Food Safety Standard Operating Procedures: https://theicn.org/icn-resources-a-z/standard-operating-procedures/ • USDA Memo SP 37-2013: Enhancing the School Food Safety Program Frequently Asked Questions https://www.fns.usda.gov/cn/enhancing-school-food-safety-program-faqs
1401.	<p>If conducted as part of the Administrative Review, are SFA contracted and self-operated warehouses, storing all foods (commercial and USDA) properly? If no, explain.</p>

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	<p>Tips: Each SFA is required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. The SFA should ensure proper storage procedures are followed:</p> <ul style="list-style-type: none"> • Temperature is appropriate for the applicable equipment • Food is stored 6 inches off the floor & 6 inches from the ceiling • The food storage facility is clean and neat • Canned goods are free from bulges, leaks, dents • Chemicals are clearly labeled and stored away from food and food-related supplies • Open bags of food are stored in containers with tight fitting lids, labeled, and dated • The FIFO (First In, First Out) method of inventory management is used • No obvious evidence of pests is present <p><i>(*Note these statements are not exhaustive and the State Agency will use discretion regarding other potentially noncompliant observations related to food safety)</i></p> <p>Resources:</p> <ul style="list-style-type: none"> • 7 CFR 210.13(d): http://www.ecfr.gov/cgi-bin/text-idx?SID=1a8454360acd28bed6c242340c8bbc72&mc=true&node=se7.4.210_113&rgn=div8 • <i>Colorado Retail Food Establishment Rules and Regulations:</i> https://drive.google.com/file/d/1kEtv4f6YciFXXzLEu6amUc9Anu9uWGYn/view • USDA Food Safety Checklist: https://fns-prod.azureedge.us/sites/default/files/media/file/action-guide-checklist.pdf
1402:	<p>The number of agricultural food components to review will be determined based on the SFA storage facility practices used.</p> <ol style="list-style-type: none"> Does the SFA store a majority of agricultural food components used at each school reviewed? <i>If Yes, Review of Buy American compliance will occur at the school level review.</i> Does the SFA store a majority of agricultural food components used at an off-site storage facility? <i>If yes, State Agency (SA) will review 2-3 items in each food component listed in the instructions at each off-site storage facility.</i> Does the SFA store agricultural food components used at both individual schools and off- site storage facilities? <i>If yes, SA will review 1-2 items in each agricultural food component listed in the instructions at each site reviewed.</i> <p>Determine if commercial foods comply with the Buy American Provision in 7 CFR 210.21(d).</p> <p>Tips:</p> <p>Each SFA is required to purchase domestic agricultural commodities or products that are produced and processed in the United States substantially using agricultural commodities that are produced in the United States or territories, as applicable. (7 CFR 210.21(d)) While limited exceptions exist when products are prohibitively costly or not available in required quantities, SFAs must consider alternative domestic foods prior to automatically approving an exception. Ensure documentation is available to support exceptions.</p>

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- As best practice, ensure solicitation and contract language includes the requirement of the purchase of domestic foods.
- As best practice, request prior written approval of non-domestic products from vendors and suppliers.
- As best practice, ensure SFA procurement and receiving staff are trained on receiving practices applicable to the Buy American provision.

Food Component Categories that SA could review:

- Bakery, pasta, and other miscellaneous components, such as:
 - grain components delivered ready to serve; and
 - wheat flour, cornmeal, or other grain flours, used to prepare grain components such as pasta, bread etc.;
- Canned fruit and fruit juice;
- Canned vegetables and vegetable juice;
- Frozen fruit and fruit juice;
- Frozen vegetables and vegetables juice;
- Frozen meat/entrée items;
- Refrigerated foods, including but not limited to:
 - Produce;
 - Dairy such as cheese, yogurt, and milk; and
 - food components that may be thawing for future meal service;

Resources:

- USDA Memo SP-38-2017 Compliance with and Enforcement of the Buy American Provision in the National School Lunch Program: <https://fns-prod.azureedge.us/sites/default/files/cn/SP38-2017os.pdf>
- CDE Buy American Provision website: <https://www.cde.state.co.us/nutrition/source-food-supplies-and-services#buyamerican>
- CDE Buy American Provision Exception Worksheet: <https://www.cde.state.co.us/nutrition/source-food-supplies-and-services#buyamerican>
- USDA Non-available articles list: <https://www.ecfr.gov/current/title-48/chapter-1/subchapter-D/part-25/subpart-25.1/section-25.104>

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1403:	<p>a. Did any review of agricultural food components indicate violations of the Buy American provision in 7 CFR 210.21(d) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable? If yes, proceed to b, if no proceed to next question.</p> <p>b. Is there documentation to determine if domestic alternatives were considered and if an granted by the SFA because:</p> <ul style="list-style-type: none"> • The agricultural food component is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or • Competitive bids reveal the costs of domestic agricultural food components are significantly higher than the non-domestic ones. • The exception was related to the domestic food as prohibitively costly or limited quantity availability. <p>Tips:</p> <ul style="list-style-type: none"> • Ensure food and beverage labels support being grown and processed in the United States and/or territories or documentation exists to support exceptions to the Buy American requirements. • Ensure documentation is available to support the exception to purchase nondomestic foods or consideration for the purchase of alternative domestic products as a substitute when the food product ordered is prohibitively costly or sufficient quantity is not available. <p>Resources:</p> <ul style="list-style-type: none"> • USDA Memo SP-38-2017 Compliance with and Enforcement of the Buy American Provision in the National School Lunch Program: https://fns-prod.azureedge.us/sites/default/files/cn/SP38-2017os.pdf • CDE Buy American Provision website: https://www.cde.state.co.us/nutrition/source-food-supplies-and-services#buyamerican • CDE Buy American Provision Exception Worksheet: https://www.cde.state.co.us/nutrition/source-food-supplies-and-services#buyamerican
School Level Questions:	
1404.	<p>Is a copy of the written food safety plan site specific and available at each school?</p> <p>Tips: The food safety program will enable schools to take systematic action to prevent or minimize the risk of foodborne illness among children. SFAs should be able to identify potential food hazards, identify critical controls points where hazards can be controlled or minimized through control measures and establish monitoring procedures and corrective action through the implementation of a HACCP based food safety program.</p> <p>The food safety plan is a written document outlining the principles of HACCP and the procedures to be followed. The food safety plan must be available at each site operating NSLP or SBP and should be a reflection of the sites operations to include all areas where food is stored, prepared, and served for all child nutrition programs at the site.</p> <p>Evaluate your current food safety efforts and provide an outline of actions you can take to enhance your efforts.</p> <p><i>Reference question #1400 for additional information.</i></p> <p>Resources:</p>

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	<ul style="list-style-type: none"> • CDE School Nutrition Food Safety Plan Template: http://www.cde.state.co.us/nutrition/haccpplantemplate • Developing a School Food Safety Program Based on the Process Approach to HACCP Principles: https://www.fns.usda.gov/ofs/developing-school-food-safety-program-based-process-approach-haccp • Institute of Child Nutrition Food Safety Standard Operating Procedures: https://theicn.org/icn-resources-a-z/standard-operating-procedures/ • USDA Memo SP 37-2013: Enhancing the School Food Safety Program Frequently Asked Questions https://www.fns.usda.gov/cn/enhancing-school-food-safety-program-faqs
1405.	<p>a. In the Comments section, list the dates of the two (2) most recent food safety inspections.</p> <p>b. Are both inspections from the current school year? If yes, move to Question 1406. If not, go to c.</p> <p>c. Were two inspections received in the previous school year? If yes, move to Question 1406 If no, go to d.</p> <p>d. Does the SFA have documentation to indicate that the SFA requested two (2) inspections in the current school year from the applicable agency?</p> <p>Tips:</p> <p>SFAs must ensure each school receives a minimum of two food safety inspections during the school year conducted by your local public health agency or Colorado Department of Public Health and Environment (CDPHE). If you normally receive one health inspection during the school year, it is recommended to contact your local public health agency in writing to document you have requested two food safety inspections. It is best practice to request two health inspections per school at the beginning of every school year, despite previous history of normally receiving two inspections. Always have documentation to support your request for inspection.</p> <p>Resources:</p> <ul style="list-style-type: none"> • CDE School Nutrition Food Safety Inspection Request Letter (Template): http://www.cde.state.co.us/nutrition/nslphealthinspectionrequesttemplate • Colorado Department of Public Health and Environment – Find your local public health agency: <ul style="list-style-type: none"> ○ https://www.colorado.gov/pacific/cdphe/find-your-local-public-health-agency
1406.	<p>Is the most recent food safety inspection report posted in a publicly visible location?</p> <p>Tips: FNS requires each school to post the most recent food safety inspection report in a publicly visible location for all participants of the school meals program to view. Can all customers in the meal service line see the most recent health inspection report? Use your best judgment when assessing its visibility to the public. The most recent inspection report must also be provided to a member of the public upon request.</p> <p><i>Reference question #1405 for additional information.</i></p> <p>As best practice place in glass display board or plastic slip cover on serving line, place on wall or door in serving line or by cashier.</p> <p>Resource:</p>

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	<ul style="list-style-type: none"> USDA Summary of Inspection Requirement: https://www.cde.state.co.us/nutrition/usdafoodsafetyinspectionrequirements
1407.	<p>Was the SFA's written food safety plan implemented? Were violations of HACCP principles observed?</p> <p>Tips: To determine if the SFA follows the food safety program and HACCP principles, can you answer "yes" to the following?</p> <ul style="list-style-type: none"> Proper personal hygiene is evident <ul style="list-style-type: none"> Appropriate hairnets, glove use, hand washing Cross contamination is prevented Food temperatures are monitored & recorded/documented Refrigerator and freezer temperatures are monitored & recorded/documented Thermometers are calibrated and documentation/logs are available Food preparation and service areas are clean & sanitized Clean utensils and equipment are used for food preparation and meal service No obvious evidence of pests is present <p><i>(*Note these statements are not exhaustive and CDE OSN will use discretion regarding other potentially noncompliant observations related to food safety)</i></p> <p>Resources:</p> <ul style="list-style-type: none"> Colorado Retail Food Establishment Rules and Regulations: https://drive.google.com/file/d/1kEtv4f6YciFXXzLEu6amUc9Anu9uWGYn/view USDA Food-Safe Schools Action Guide: Creating a Culture of Food Safety <ul style="list-style-type: none"> http://www.fns.usda.gov/sites/default/files/Food-Safe-Schools-Action-Guide.pdf

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1408.	<p>Were the selected relevant temperature logs available for review?</p> <p>Tips:</p> <p>SFAs shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations</p> <p>Temperature logs must be maintained for all time/temperature control for safety (TCS) food, refrigerators, freezer, and beverage coolers. Check temperature logs to ensure proper recordkeeping. Ensure records are maintained for a minimum of 6 months (district and county regulations may vary). Utilize the templates located on the CDE School Nutrition website. Compliance can occur multiple ways- temperature logs located on the equipment, taken twice daily and kept for each month, one temperature sheet per day with all equipment located on it, food temperatures kept separately, kept on production records, utilize a binder to maintain past logs. Necessary to know food and equipment is being held at the correct temperatures to ensure safe food and to reduce the occurrence of a foodborne illness. Potentially hazardous foods shall remain below 41°F or above 135°F.</p> <p>Resources:</p> <ul style="list-style-type: none">• Temperature Log Templates under the Resources and Required Documentation section• https://www.cde.state.co.us/nutrition/ensure-food-safety#additionalresources• 7 CFR 210.13: http://www.ecfr.gov/cgi-bin/text-idx?SID=1a8454360acd28bed6c242340c8bbc72&mc=true&node=se7.4.210_113&rgn=div8
1409.	<p>Were on-site (or off-site, if observed) storage violations observed?</p> <p>Tips:</p> <p>SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. Examples of storage facilities may include freezers, refrigerators, dry storage, warehouses, and other areas. Be mindful of proper storage practices. Compliant if you can answer “yes” to these items below</p> <ul style="list-style-type: none">• Temperatures are within the correct range for all food storage areas (Dry: 50°F-70°F, Refrigeration: 32°F-40°F, Freezer: 0°F-2°F).• Temperature logs are maintained for all time/temperature control for safety (TCS) food during storing, preparing, and serving, and food storage areas, such as refrigerator, freezer, and beverage coolers.• Food is stored 6” off the floor• All items are labeled and dated (received date, use-by date)• All food items are properly wrapped and stored in containers with tight fitting lids• Canned goods are free from bulges, leaks, and dents• Chemicals are clearly labeled and stored away from food and food-related supplies• First In, First Out inventory method is used• Foods are stored to prevent cross-contamination

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	<ul style="list-style-type: none"> • All foods are from reputable sources • No obvious evidence of pests is present <p>As a best practice ensure thermometers are located in all food storage; in addition, to equipment thermometers. If equipment does not contain a thermometer, an internal thermometer must be present.</p> <p><i>(*Note these statements are not exhaustive and CDE School Nutrition will use discretion regarding other potentially noncompliant observations related to food safety)</i></p> <p>Resources:</p> <ul style="list-style-type: none"> • 7 CFR 210.13(d): http://www.ecfr.gov/cgi-bin/text-idx?SID=1a8454360acd28bed6c242340c8bbc72&mc=true&node=se7.4.210_113&rgn=div8 • <i>Colorado Retail Food Establishment Rules and Regulations:</i> https://drive.google.com/file/d/1kEtv4f6YciFXXzLEu6amUc9Anu9uWGYn/view • USDA Food Safety Checklist: https://fns-prod.azureedge.us/sites/default/files/media/file/action-guide-checklist.pdf
1410.	<p>The number of agricultural food components to review will be determined based on the SFA storage facility practices used.</p> <ol style="list-style-type: none"> Does the SFA store a majority of food products used at each school? <i>If yes, review 2-3 items in each food category listed in the instructions at each school reviewed.</i> Does the SFA store agricultural food components used at a combination of places to include individual schools and an off- site storage facilities? <i>If yes, review 1-2 items in each agricultural food component category listed in the instructions at each school reviewed. In the comments section list any noncompliant food items that are observed.</i> <p>Tips:</p> <p>SA must check labels on the foods in various on and off-site facilities at the reviewed schools/SFA. Assess country of origin of the products received. On-Site storage facilities may include school freezers, refrigerators, dry storage rooms, and other areas. SA will review a variety of products per food component category as instructed per storage classification below:</p> <ul style="list-style-type: none"> • On-site at individual schools receiving an on-site review, the SA will review 2-3 items in each food category • Off-site at warehouse storage facility only, the SA will review 2-3 items in each food category • Combination on-site and off-site storage options, the SA will review 1-2 items in each food category on-site at each reviewed school and at off-site storage facilities. <p>Food Component Categories that SA could review:</p> <ul style="list-style-type: none"> • Bakery, pasta, and other miscellaneous components, such as: <ul style="list-style-type: none"> ○ grain components delivered ready to serve; and

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	<ul style="list-style-type: none"> ○ wheat flour, cornmeal, or other grain flours, used to prepare grain components such as pasta, bread etc.; • Canned fruit and fruit juice; • Canned vegetables and vegetable juice; • Frozen fruit and fruit juice; • Frozen vegetables and vegetables juice; • Frozen meat/entrée items; • Refrigerated foods, including but not limited to: <ul style="list-style-type: none"> ○ Produce; ○ Dairy such as cheese, yogurt, and milk; and ○ food components that may be thawing for future meal service;
1411.	<p>a. Did any review of products indicate violations of the Buy American provision in 7 CFR 210.21(d) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable? <i>If yes, proceed to b, if no proceed to next section.</i></p> <p>b. Is there documentation to determine if domestic alternatives were considered and if an granted by the SFA because:</p> <ul style="list-style-type: none"> • The agricultural food component is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or • Competitive bids reveal the costs of domestic agricultural food components are significantly higher than the non-domestic ones. • The exception was related to the domestic food as prohibitively costly or limited quantity availability. <p>Tips:</p> <ul style="list-style-type: none"> • Ensure food and beverage labels support being grown and processed in the United States and/or territories or documentation exists to support exceptions to the Buy American requirements. • Ensure documentation is available to support the exception to purchase nondomestic foods or consideration for the purchase of alternative domestic products as a substitute when the food product ordered is prohibitively costly or sufficient quantity is not available. <p>Resources:</p> <ul style="list-style-type: none"> • USDA Memo SP-38-2017 Compliance with and Enforcement of the Buy American Provision in the National School Lunch Program: https://fns-prod.azureedge.us/sites/default/files/cn/SP38-2017os.pdf • CDE Buy American Provision website: https://www.cde.state.co.us/nutrition/source-food-supplies-and-services#buyamerican • CDE Buy American Provision Exception Worksheet: https://www.cde.state.co.us/nutrition/source-food-supplies-and-services#buyamerican