

USDA Administrative Review: Food Safety

On-Site Questions	
SFA Level Questions:	
1400.	<p>a. Does the written food safety plan contain the required elements? b. <u>Was a copy of the written food safety plan available at each school?</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"> • <u>CDE OSN Food Safety Plan Template:</u> http://www.cde.state.co.us/nutrition/osnfoodsafetyresources-0 • <u>Food-Safe Schools Action Guide:</u> http://www.cde.state.co.us/nutrition/foodsafetyfoodsafeschoolsactionguide • <u>Developing a School Food Safety Program Based on the Process Approach to HACCP Principles:</u> http://www.cde.state.co.us/nutrition/osnfoodsafetyguidanceforsfas • <u>NFSMI Sample Standard Operating Procedures:</u> http://www.cde.state.co.us/nutrition/osnfoodsafetyguidanceforsfas • <u>CDE OSN Food Safety Policy:</u> http://www.cde.state.co.us/nutrition/osnfoodsafetypolicy • <u>USDA Memo SP 37-2013: Enhancing the School Food Safety Program Frequently Asked Questions</u> http://www.fns.usda.gov/sites/default/files/SP37-2013os.pdf
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> <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"> <input type="checkbox"/> Temperature is appropriate for the applicable equipment <input type="checkbox"/> Food is stored 6 inches off the floor & 6 inches from the ceiling

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	<ul style="list-style-type: none"><input type="checkbox"/> The food storage facility is clean and neat<input type="checkbox"/> Canned goods are free from bulges, leaks, dents<input type="checkbox"/> Chemicals are clearly labeled and stored away from food and food-related supplies<input type="checkbox"/> Open bags of food are stored in containers with tight fitting lids, labeled, and dated<input type="checkbox"/> The FIFO (First In, First Out) method of inventory management is used<input type="checkbox"/> 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 harmful observations related to food safety)</i></p> <p>Resources:</p> <ul style="list-style-type: none"><input type="checkbox"/> 7 CFR 210.13(d): http://www.ecfr.gov/cgi-bin/text-idx?SID=1a8454360acd28bed6c242340c8bbc72&mc=true&node=se7.4.210_113&rgn=div8<input type="checkbox"/> <i>Rules and Regulations Governing Schools in the State of Colorado</i>(6 CCR § 1010-6): https://www.colorado.gov/pacific/sites/default/files/Rules%20and%20Regulations%20Governing%20Schools.pdf<input type="checkbox"/> Food Safety Checklist: http://www.nfsmi.org/documentlibraryfiles/PDF/20100204085529.pdf
1402:	<p>The number of agricultural food components to review will be determined based on the SFA storage facility practices used.</p> <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> <ul style="list-style-type: none"><input type="checkbox"/> As best practice, ensure solicitation and contract language includes the requirement of the purchase of domestic foods.<input type="checkbox"/> As best practice, request prior written approval of non-domestic products from vendors and suppliers.<input type="checkbox"/> As best practice, ensure SFA procurement and receiving staff are trained on receiving practices applicable to the Buy American provision. <p>Resources:</p> <ul style="list-style-type: none"><input type="checkbox"/> USDA Memo SP-24-2016 Compliance with and Enforcement of the Buy American Provision in the National School Lunch Program: http://www.fns.usda.gov/sites/default/files/cn/SP24-2016os.pdf

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1403:	<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? If yes, proceed to b, if no proceed to next question.</p> <p>b. Obtain documentation to determine if domestic alternatives were considered and if the exception was related to the domestic food as prohibitively costly or limited quantity availability. Identify any noncompliant food products and country of origin in the comments section and inform the SA staff conducting the procurement review of this finding to identify if the Buy American provision is in the SFA solicitation and contract to purchase commercial foods.</p> <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"> □ FNS Policy Memo SP 24-2016, Compliance with and Enforcement of the Buy American Provision in the National School Lunch Program: http://www.fns.usda.gov/sites/default/files/cn/SP24-2016os.pdf
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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. <i>Reference the Food-Safe Schools Action Guide, below.</i></p> <p><i>Reference question #1400 for additional information.</i></p> <p>Resources:</p> <ul style="list-style-type: none"> • CDE OSN Food Safety Plan Template: http://www.cde.state.co.us/nutrition/osnfoodsafetyresources-0 • Food-Safe Schools Action Guide: http://www.cde.state.co.us/nutrition/foodsafetyfoodsafeschoolsactionguide
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	<ul style="list-style-type: none">• Developing a School Food Safety Program Based on the Process Approach to HACCP Principles: http://www.cde.state.co.us/nutrition/osnfoodsafetyguidanceforsfas• NFSMI Sample Standard Operating Procedures: http://www.cde.state.co.us/nutrition/osnfoodsafetyguidanceforsfas• CDE OSN Food Safety Policy: http://www.cde.state.co.us/nutrition/osnfoodsafetypolicy
1405.	<p>a. In the Comments section, list the dates of the two (2) most recent food safety inspections</p> <p>b. If both inspections are from the current school year, move to Question 1403. If not, go to c.</p> <p>c. Were two inspections received in the previous school year? 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 OSN Food Safety Inspection Request Letter (Template): http://www.cde.state.co.us/nutrition/osnfoodsafetyinspections• 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 #1403 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>Resources:</p> <ul style="list-style-type: none">• §210.13 Facilities Management<ul style="list-style-type: none">○ http://www.cde.state.co.us/nutrition/osnfoodsafetyinspections

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1407.	<p>Was the SFA's written food safety plan implemented? Were HACCP principle violations 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"><input type="checkbox"/> Proper personal hygiene is evident<ul style="list-style-type: none">○ Appropriate hairnets, glove use, hand washing<input type="checkbox"/> Cross contamination is prevented<input type="checkbox"/> Food temperatures are monitored & recorded/documented<input type="checkbox"/> Refrigerator and freezer temperatures are monitored & recorded/documented<input type="checkbox"/> Thermometers are calibrated and documentation/logs are available<input type="checkbox"/> Food preparation and service areas are clean & sanitized<input type="checkbox"/> Clean utensils and equipment are used for food preparation and meal service<input type="checkbox"/> No obvious evidence of pests is present <p><i>(*Note these statements are not exhaustive and CDE OSN will use discretion regarding other potentially harmful observations related to food safety)</i></p> <p>Resources:</p> <ul style="list-style-type: none">• Rules & Regulations Governing Schools in the State of Colorado (6 CCR 1010-6)<ul style="list-style-type: none">○ https://www.colorado.gov/pacific/sites/default/files/Rules%20and%20Regulations%20Governing%20Schools.pdf• 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• USDA FNS Food Safety Resources: http://www.fns.usda.gov/food-safety/food-safety-resources• Serving it Safe- Institute of Child Nutrition<ul style="list-style-type: none">○ http://www.nfsmi.org/ResourceOverview.aspx?ID=327• Iowa State University Extension & Outreach Food Safety<ul style="list-style-type: none">○ Training Videos: http://www.extension.iastate.edu/foodsafety/content/foodservice-employee-training
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1408.	<p>Were selected relevant temperature logs available for review?</p> <p>Tips: 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 potentially hazardous foods, 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 OSN website, also available at NFSMI. 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<ul style="list-style-type: none">◦ http://www.cde.state.co.us/nutrition/osnfoodsafetyresources-0• 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: 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 (* this is now a requirement), 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"><input type="checkbox"/> 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).<input type="checkbox"/> Temperature logs are maintained for all potentially hazardous foods during storing, preparing, and serving, and food storage areas, such as refrigerator, freezer, and beverage coolers.<input type="checkbox"/> Food is stored 6” off the floor<input type="checkbox"/> All items are labeled and dated (received date, use-by date)<input type="checkbox"/> All food items are properly wrapped and stored in containers with tight fitting lids<input type="checkbox"/> Canned goods are free from bulges, leaks, and dents<input type="checkbox"/> Chemicals are clearly labeled and stored away from food and food-related supplies<input type="checkbox"/> First In, First Out inventory method is used<input type="checkbox"/> Foods are stored to prevent cross-contamination<input type="checkbox"/> All foods are from reputable sources

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	<p><input type="checkbox"/> No obvious evidence of pests is present</p> <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 OSN will use discretion regarding other potentially harmful observations related to food safety)</i></p> <p>Resources:</p> <ul style="list-style-type: none"> • 7 CFR 210.13 (d) http://www.cde.state.co.us/nutrition/osnfoodsafety policy • Manager Self- Inspection Checklist: http://www.foodsafeschools.org/FSAG_CD/Resources/FSIS/Checklist/ManagersChecklist.pdf
1410.	<p>a. Does the SFA store a majority of food products used at each school? If yes, review 2-3 items in each food category listed in the instructions at each school reviewed.</p> <p>b. Does the SFA store food products used at a combination of places to include individual schools and an off- site storage facilities? If yes, review 1-2 items per food category listed in the instructions at each school reviewed. In the comments section list any noncompliant food items that are observed.</p> <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"> <input type="checkbox"/> On-site at individual schools receiving an on-site review, the SA will review 2-3 items in each food category <input type="checkbox"/> Off-site at warehouse storage facility only, the SA will review 2-3 items in each food category <input type="checkbox"/> 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>Resources:</p>
1411.	<p>c. 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? If yes, proceed to b, if no proceed to next question.</p> <p>d. Obtain documentation to determine if domestic alternatives were considered and if the exception was related to the domestic food as prohibitively costly or limited quantity availability. Identify any noncompliant food products and country of origin in the comments section and inform the SA staff conducting the procurement review of this finding to identify if the Buy American provision is in the SFA solicitation and contract to purchase commercial foods.</p> <p>Tips:</p>

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- 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.

Resources:

- FNS Policy Memo SP 24-2016, Compliance with and Enforcement of the Buy American Provision in the National School Lunch Program:
<http://www.fns.usda.gov/sites/default/files/cn/SP24-2016os.pdf>