



# Food Safety

## Idaho School Nutrition Reference Guide

### OVERVIEW

The U.S. Department of Agriculture (USDA) has issued guidance for the implementation of Hazard Analysis and Critical Control Points (HACCP) -based food safety programs in schools participating in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP). 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 thus requiring school food authorities (SFAs) to implement a food safety program for the preparation and service of school meals served to children, effective since 2005. The Healthy Hunger-Free Kids Act of 2010 strengthened the existing food safety requirement by applying it to “any facility, or part of a facility in which food is stored, prepared or served, such as on school buses, in hallways, school courtyards, kiosks, classrooms or other locations outside the cafeteria.” (Memo Code 37-2011. May 18, 2011)

### TERMS TO KNOW

**HACCP (Hazard Analysis Critical Control Points)** - A management system in which food safety is addressed through the analysis and control of biological, chemical, and physical hazards from raw material production, procurement and handling, to manufacturing, distribution and consumption of the finished product.

**HACCP bodily fluid clean-up** – Must be in place in all kitchen / cafeteria / serving sites in order to provide a standard operating procedure to safely and properly respond to all incidents requiring cleaning and disinfecting of bodily fluid spills.

**Standard operating procedure (SOP)** – A set of written instructions that establish a procedure used to perform a job properly and facilitate consistency.

### WHAT IS FOOD SAFETY?

For the purposes of the Idaho School Nutrition Reference Guide, food safety refers to a written plan based on HACCP guidance that is implemented in individual schools to help ensure that meals served to children (who are regarded as an “at risk” population due to their immune systems not being fully developed) are safe. The food safety plan should be relevant to the school site(s) and personalized to meet the needs of the facility. A copy of the food safety plan must be located in each kitchen site and must be available to all food service staff at any time.

The food safety plan should address cleanliness and sanitation of employees, food contact surfaces, utensils, and equipment; temperature control during storage, preparation, holding, and service of food; standard operating procedures for addressing sanitation and cleanliness; staff training to properly implement standard operating procedures; process for monitoring compliance with SOPs at least once a month; corrective action when SOPs are not followed; recordkeeping to provide proof that all provisions of the plan are met; and evaluation procedures to review and update the plan on an ongoing or at least an annual basis. HACCP Bodily Fluid Clean-up must be in place in all kitchen / cafeteria / serving sites in order to provide SOP to safely and properly respond to all incidents requiring cleaning and disinfecting of body fluid spills. Body fluids, including vomit, diarrhea, and blood, are considered potentially infectious. Employees should always wear personal protective equipment when cleaning and disinfecting body fluid spills.

A sample HACCP Food Safety plan and a sample Bodily Fluid Cleanup plan are available in MyIdahoCNP under Download Forms.

### Idaho Food Code Compliance

Beginning July 1, 2018, the Idaho Food Code requires a “person in charge”, who has direct managerial duties in the kitchen (at a school district this could be the Food Service Director), to have food safety training approved by the Idaho Department of Health and Welfare (DHW). Completion of one of the approved examinations and courses will meet the demonstration of knowledge requirements in Section 2-102.11 of the Idaho Food Code. The State of Idaho does not endorse any one particular course; a list of adequate courses may be found on the Food Protection page of the Idaho DHW website.

### Professional Standards Compliance

The Food Service Director must have eight hours of Food Safety Training within the last five years to meet USDA professional standards compliance. A newly hired Food Service Director must have successfully completed food safety training within the past five years or within 30 days of start date.

### Exclusions and Restrictions

When dealing with sick staff, have an SOP in place to address employee exclusions and restrictions. Send employees home if they have vomiting, diarrhea, or jaundice. Restrict employees from working with or around food if they have a fever and sore throat. Send employees with fever and a sore throat home if they are working with vulnerable populations.

Considerations in implementing a food safety program:

- Serving sites (cafeteria, multiple locations, and classrooms)
- Equipment available (for cooking, holding, cooling, salad bar)
- Operation “food flow” (receiving through serving)
- Menu item handling (No Cook, Same Day, Complex Foods)
-

Food safety includes:

- Standard Operating Procedures such as:
  - Allergen Management
  - Bodily Fluid Clean-Up
  - Cleaning and Sanitizing Food Contact Surfaces
  - Controlling Time and Temperature During Preparation
  - Cooking Potentially Hazardous Foods
  - Cooling Potentially Hazardous Foods
  - Date Marking Ready-to-Eat, Potentially Hazardous Food
  - Handling a Food Recall
  - Holding Hot and Cold Potentially Hazardous Foods
  - Personal Hygiene / Hand Washing / Hair Restraints
  - Preventing Contamination at Food Bars
  - Preventing Cross-Contamination During Storage and Preparation
  - Receiving Deliveries
  - Reheating Potentially Hazardous Foods
  - Serving Food
  - Storing and Using Poisonous or Toxic Chemicals
  - Transporting Food to Remote Sites (such as satellite kitchens)
  - Using and Calibrating Thermometers
  - Using Suitable Utensils When Handling Ready-to-Eat Foods
  - Vendor Certification Programs
  - Washing Fruits and Vegetables
  
- Record Keeping, such as:
  - Cooking and Reheating Temperature Log
  - Cooling Temperature Log
  - Damaged or Discarded Product Log
  - Food Contact Surfaces Cleaning and Sanitizing Log
  - Production Log
  - Receiving Log
  - Refrigeration Log
  - Thermometer Calibration Log
  - Food Safety Training Agenda and Attendance
  - Temperature Logs for Food Storage (dry storage, coolers, freezers; temperatures taken and recorded daily on days when school is in operation and regularly during school breaks)
  - Dating all Food Items with Month, Day, Year (rotation of food items - “First In, First Out”)
  - Food Labels (identification in the event of a food recall or for a food allergy concern)
  - Material Safety Data Sheet (MSDS) (describes how to handle a chemical or toxic substance accident, listing ingredients in the chemical or toxic substance, and provides emergency contact information)
  - Grease Trap Inspection Records

- Rodent Inspection & Insect Control Records
- Public Health Department Inspections (two must be requested every school year; a copy of the most recent inspection report must be posted in public view in the food service area)
- Annual Inventory Form

Other considerations for a successful food safety program:

- Review the food safety plan annually and revise it accordingly.
- Train food service staff **annually and as needed** on HACCP procedures that are pertinent to their job duties. Keep an agenda and sign-in sheet of the training(s) on file for three years plus the current year to document the training.
- During the summer break, safeguard the food supply by checking food-containing freezer temperatures and recording dates and temperatures on a temperature log.
- Post a sign on freezers providing food service supervisor contact information in case utilities are disconnected.
- Place locks on food storage areas and limit access to help prevent tampering of food items and theft.

Food safety training may count toward professional standards annual training requirements. Remember to retain on file documentation of training received.

## WHY IS FOOD SAFETY IMPORTANT?

Safe food is a key aspect of a healthy school environment. A food safety plan helps ensure that safe, appealing meals are served to children.

## RESOURCES

Additional resources may be available for this topic. Please check the Idaho School Nutrition Reference Guide website for copies of manuals, user guides and helpful links to relevant subject matter.

---

### For Questions Contact

Child Nutrition Programs  
Idaho State Department of Education  
650 W State Street, Boise, ID 83702  
208 332 6820 | [www.sde.idaho.gov](http://www.sde.idaho.gov)

## USDA Nondiscrimination Statement

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**  
U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or
2. **fax:**  
(833) 256-1665 or (202) 690-7442; or
3. **email:**  
[program.intake@usda.gov](mailto:program.intake@usda.gov)

This institution is an equal opportunity provider.