

HACCP

LAKECIA LOVE, M. ED
POTENTIAL NEW NSLP SPONSOR WORKSHOP
APRIL 1, 2021

Click on the link below to access the recorded training:

<https://alsde.webex.com/alsde/lsr.php?RCID=07bc9b888b904a958d07ebee9e2937bf>

HAZARD ANALYSIS CRITICAL CONTROL POINT(HACCP)

- ▶ HACCP is a food safety plan that conforms to the principles and guidance issued by the U.S. Department of Agriculture.
- ▶ All SFAs must have fully implemented HACCP plan.
- ▶ 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 preparation process.
- ▶ SFA's overall food safety program must include a written plan that tailors to its own specific program.

HACCP REQUIREMENTS

- ▶ HACCP plans should include Standard Operating Procedures (SOPs), sanitation, time and temperature control points, food process approaches (3), and documentation logs.
- ▶ Standard Operating Procedures are instructions for procedures involved in the daily functions of the food service program.
- ▶ Standard Operating Procedures contents may include: purpose, monitoring procedures, instructions, corrective actions, and verification procedures.



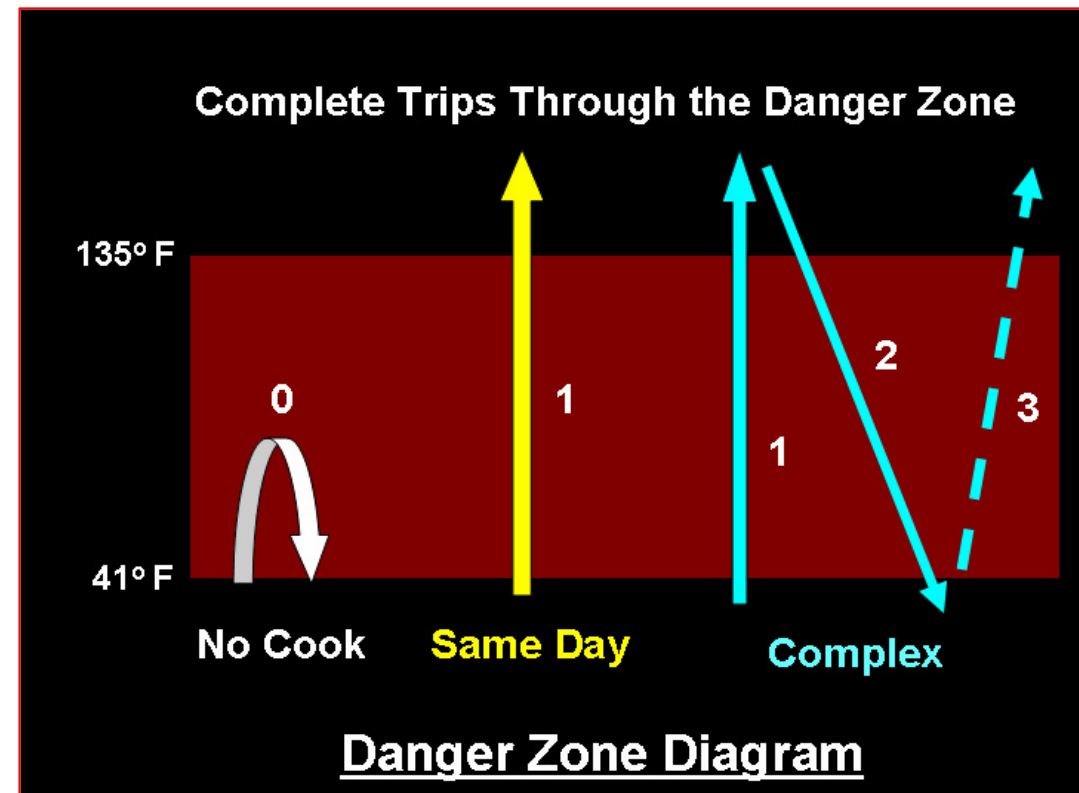
SANITATION REQUIREMENTS

A pair of hands wearing orange nitrile gloves, resting on a white cloth on a dark surface. The background is dark and slightly blurred, focusing attention on the hands and the text.

- ▶ Sanitation processes include the sanitizing of all food contact surfaces, personal hygiene, and prevention of foodborne illnesses.
- ▶ 3 Types of Food Contamination
 - ▶ 1. Food – to – Food Contamination
 - ▶ 2. Equipment or Contact Surface –to-Food Cross Contamination
 - ▶ 3. Chemical Contamination

FOOD PROCESS APPROACH

- ▶ Food process approaches consist of no cook, same day service, and complex food preparation.
- ▶ These categories are based on the number of times a menu item makes a complete trip through the temperature danger zone.



Examples of HACCP Forms

1. Hazard Analysis Table

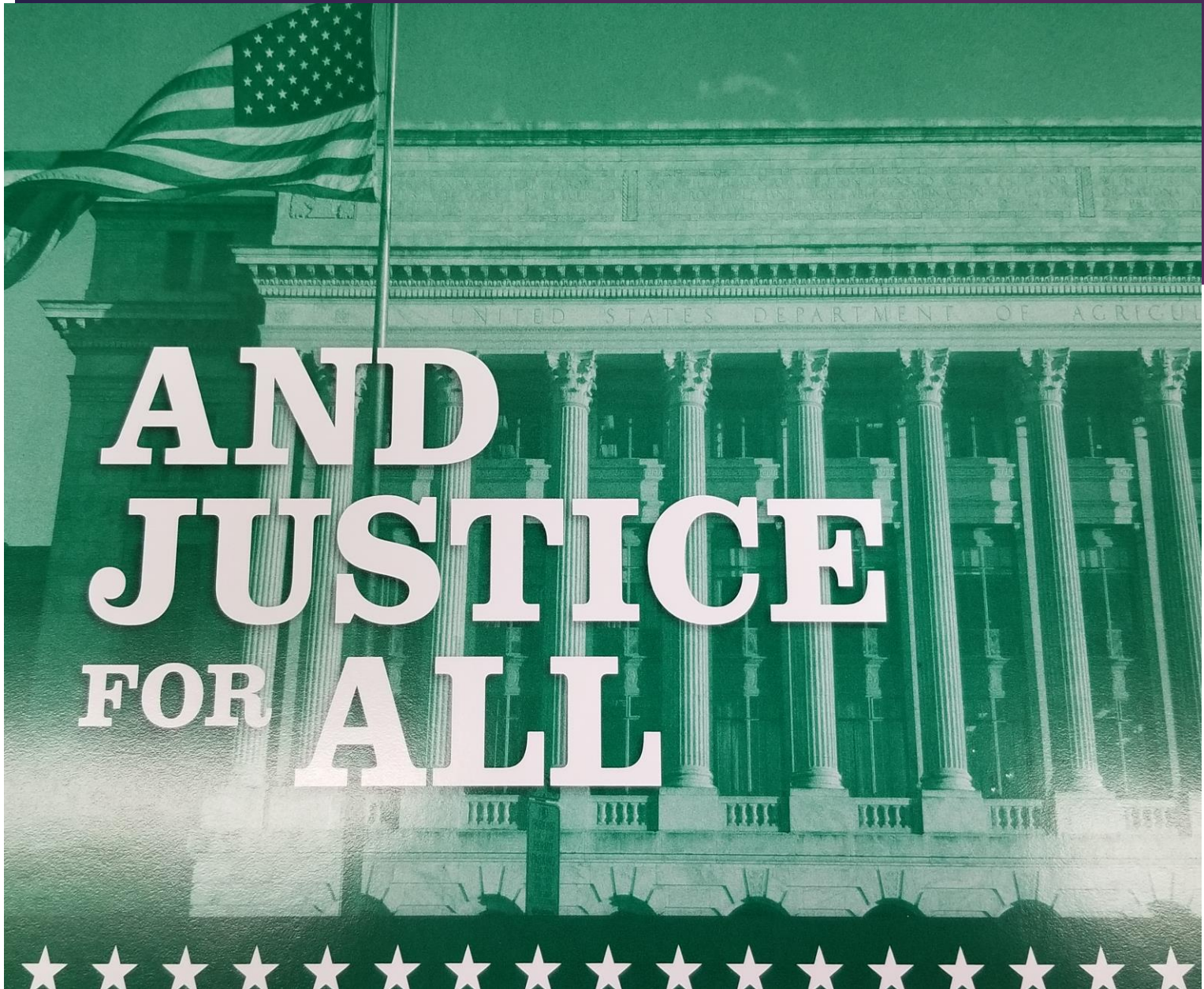
PROCESS STEP					
Processing Step	Potential Hazards (C) Chemical (P) Physical (B) Biological	Is this potential food safety hazard significant?	Justification of Decision	Preventive Measures	Is this step a CCP?

NAME OF FOOD ESTABLISHMENT: _____ BRIEF PRODUCT DESCRIPTION: _____
ADDRESS: _____
SIGNATURE: _____ DATE: _____

- ▶ **Critical Control Points:** SFAs must identify and document the critical control points (CCP) in each food process approach.

HACCP TRAINING

- ▶ HACCP training is required by all CNP employees and must be completed each year.
- ▶ HACCP plans are not set in stone and may be changed throughout the year. If the current HACCP has been changed, please distribute the new HACCP plan to all facilities or schools.
- ▶ It is critical to complete a food safety checklist and monitor each facility for verification of compliance.
- ▶ Documentation logs assist in record keeping and verification of compliance.
- ▶ HACCP food safety plans are required at each school or facility location in your district



CIVIL RIGHTS

CIVIL RIGHTS

- ▶ The mission of FNS Civil Rights Division is to provide leadership for comprehensive protection against discrimination in employment practices and delivery of programs to the public. It ensures that applicants and individuals who are eligible to participate in our programs are treated fairly and equitably, with dignity and respect.
- ▶ All CNP employees must complete civil rights training each year.
- ▶ The area of compliance consists of :
 - Assurances**
 - Disability Compliance**
 - Verification of Citizenship**
 - Racial & Ethnic Data Collection**
 - **Limited English Proficiency (LEP)**
 - **Public Notification**
 - Complaints of Discrimination**
 - **Civil Rights Training**
 - Compliance Reviews & Resolution of Noncompliance**
 - **Conflict Resolution**
 - **Customer Service**

WHY CIVIL RIGHTS TRAINING?

- ▶ Training is required so that individuals involved in all levels of administration of programs that receive Federal financial assistance understand Federal laws, regulations, instructions, policies and other guidance.
- ▶ Civil Rights Concepts:
 1. Stereotyping: preconceived beliefs or oversimplified generalizations about a particular group.
 2. Prejudice: a set of rigid & unfavorable attitudes towards a particular group that is formed without considering acts.
 3. Discrimination: the practice of treating people differently because of how we have grouped them in our minds according to our prejudices.

WHAT IS DISCRIMINATION IN CNP?

- ▶ Different treatment which makes a distinction of one person or a group of persons from others, either intentionally, by neglect, or by the actions or lack of actions based on a protected class
- ▶ Protected classes for CNP
 - Race
 - National origin
 - Color
 - Age
 - Sex
 - Disability

PROFESSIONAL STANDARDS:

HIRING AND TRAINING



PROFESSIONAL STANDARDS

- ▶ Professional Standards as required by the Healthy, Hunger-Free Kids Act of 2010 became effective beginning July 1, 2015.
- ▶ It requires a minimum amount of annual training hours for school nutrition program's personnel and minimum hiring standards for school nutrition program directors



USDA TRAINING STANDARDS

Position	Required Hours
Directors	12 Hours
Managers	10 Hours
All Other Staff	6 Hours
Part-Time Staff (work <20 hours/week)	4 Hours

- Note: If hired January 1 or later, an employee must only complete half of the above required training hours.
- ▶ Use the list of key training topics and learning objectives on the next slide to fulfill the training hours above.

https://fns-prod.azureedge.net/sites/default/files/cn/profstandards_flyer.pdf

ALSDE TRAINING STANDARDS

▶ CNP Director

- ▶ A minimum of 15 clock hours or approved professional development per year is required for State director certificate validity
 - ▶ ALSDE CNP will make final decision on approval of professional development activities

<http://www.alabamaadministrativecode.state.al.us/docs/ed/McWord290-080-030.pdf>





ALSDE Training Standards (cont.)

- ▶ 9, 10, 11 month employees
 - ▶ Local boards of education are hereby authorized to schedule two additional days of professional development/continuing education for all 9,10, and 11 month contracts of Child Nutrition Program support personnel.
- ▶ It is the intent of the Legislature that the purpose of these training sessions for all employed support personnel will be to provide occupation-specific skill training, safety training, training on school discipline, and other relevant aspects of support personnel interaction with students.

TRAINING HOUR SUMMARY

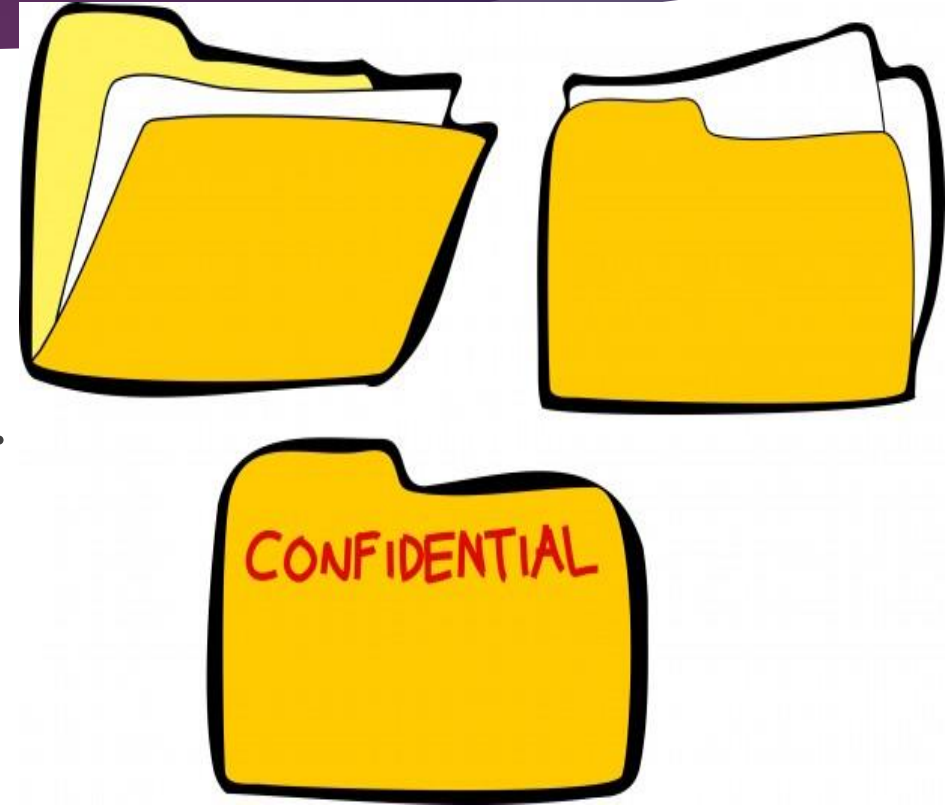
USDA	
Employee Type	Hours
Directors	12
Managers	10
Full Time Staff	6
Part-Time Staff	4

ALSDE (Public Schools Only)	
Employee Type	Hours/Days
Directors	15 hours
9, 10, 11 Month Employees	2 Professional Development Days

- A Professional Development Day is equivalent to a (9, 10, or 11 month) employee's normal daily work hours.
- Training hours are recorded on a tracking tool yearly.

DOCUMENTATION

- ▶ CNP employee list
- ▶ Certificates of completion
- ▶ Education achievement certificates (i.e.
- ▶ Training sign-in sheets
- ▶ Training agendas
- ▶ Planned/scheduled trainings



TRAINING REQUIRED

- Contract employees that are involved in the management or operation of the CNP.
- Substitute staff working throughout the school district on a regular basis

TRAINING NOT REQUIRED

- Staff that provide support to, but not specifically involved in the operation of the CNP (i.e. custodian).
- Office staff that process free/reduced-priced meal applications or that provide other support for the CNP for only a short period of time during the school year
- “Temporary” employees
- Vended meal providers
- Volunteers

USDA FAQs (SP 38-2016)

- Assistant directors must at least complete the annual training required for program managers (10 hours annually).
- Back to school training on security procedures, building operations, etc. do not count towards USDA annual training requirements.
These hours could count toward ALSDE training hours.
- Civil rights training **does** count towards annual training requirements.
All applicable topics must be covered during this training in order to count.
 - Job duties in the CNP are used to determine if training

USDA CNP Director Hiring Standards



Minimum Requirements for Directors	Student Enrollment 2,499 or less	Student Enrollment 2,500-9,999	Student Enrollment 10,000 or more
<p>Minimum Education Standards</p> <p>See the final rule for additional preferred educational standards for new directors</p>	<p>Bachelor's degree, or equivalent educational experience, with academic major in specific areas;*</p> <p>OR</p> <p>Bachelor's degree in any academic major, and State-recognized certificate for school nutrition directors;</p> <p>OR</p> <p>Bachelor's degree in any academic major, and at least 1 year year of relevant school nutrition programs experience;</p> <p>OR</p> <p>Associate's degree or equivalent educational experience, with academic major in specific areas,* and at least 1 year of relevant school nutrition programs experience;</p> <p>OR</p> <p>High school diploma (or GED) and at least 3 years of relevant experience in school nutrition programs.</p> <p>(For an LEA with less than 500 students, the State agency may approve a candidate who meets the educational standards but has less than the required 3 years experience.)</p>	<p>Bachelor's degree, or equivalent educational experience, with academic major in specific areas;*</p> <p>OR</p> <p>Bachelor's degree in any academic major, and State-recognized certificate for school nutrition directors;</p> <p>OR</p> <p>Bachelor's degree in any academic major and at least 2 years of relevant school nutrition programs experience;</p> <p>OR</p> <p>Associate's degree or equivalent educational experience, with academic major in specific areas,* and at least 2 years of relevant school nutrition programs experience.</p>	<p>Bachelor's degree, or equivalent educational experience, with academic major in specific areas;*</p> <p>OR</p> <p>Bachelor's degree in any academic major, and State-recognized certificate for school nutrition directors;</p> <p>OR</p> <p>Bachelor's degree in any academic major and at least 5 years experience in management of school nutrition programs.</p> <p>* Specific majors/areas of concentration: food and nutrition, food service management, dietetics, family and consumer sciences, nutrition education, culinary arts, business, or a related field.</p>
<p>Minimum Prior Training Standards</p>	<p>At least 8 hours of food safety training is required either not more than 5 years prior to their starting date or completed within 30 days of the employee's start date.</p>		

https://fns-prod.azureedge.net/sites/default/files/cn/profstandards_flyer.pdf



ALSDE DNP DIRECTOR HIRING STANDARDS

- A minimum of a bachelor's degree from a accredited institute in Foods and Nutrition, Food Service Management, or Home Economics/Family and Consumer Sciences (with a minimum of four courses in foods and nutrition)
- Verify a minimum of 1400 clock hours of compensated food service management.

OR

<http://www.alabamaadministrativecode.state.al.us/docs/ed/McWord290-080-030.pdf>



ALSDE CNP Director Provisional Requirements

A bachelor's degree from a accredited institute in any subject area other than the one identified above and completion of the following education requirements for certification within three years from the date of employment

- ✓ A minimum of nine semester hours in food and nutrition
- ✓ A minimum of three semester hours in Quantity Food Production and three semester hours in Quantity Purchasing
- ✓ A minimum of three semester hours in personnel management and three semester hours in accounting

A CNP director employed prior to July 1, 1994, shall be exempt from the ALSDE Hiring Standards

PAID LUNCH EQUITY & NON-PROGRAM FOODS

- ▶ 2 financial provisions that are associated with the Healthy, Hunger-Free Kids Act of 2010.
- ▶ Please note that both of these provisions apply to all facilities that participate in the NSLP which includes Public Schools, and RCCIs (Residential Child Care Institutions).
- ▶ HHFKA directs SFAs to:
 - Compare the average price charged for paid lunches to the difference between the higher federal reimbursement provided for free lunches & the lower federal reimbursement for paid lunches.
 - If the average paid lunch price is less than the difference, an SFA must either gradually adjust average prices or provide non-federal funding to cover the difference.

PAID LUNCH EQUITY (PLE)

- **Intent**

- Ensure that sufficient funds are provided to the nonprofit food service account for paid lunches.
- For SFAs to provide the same level of support for lunches served to students who are not eligible for free or reduced-price lunches.

- **Why is this Provision important?**

Average prices charged for paid lunches are less than the cost of producing those lunches and these federal funds intended for free and reduced-price lunches are used to help support the difference between the paid lunch costs and what the school receives for it.

- ❖ **Requires annual evaluation of paid lunch prices.**
- ❖ The price of lunch meals is determined by the consumer price index and the USDA percentage

This version of the PLE Tool applies only to SY 2020-2021. A new version of the PLE Tool will be issued for SY 2021-2022.

The SY 2020-21 PLE Tool consists of 8 tabs:

Hyperlinks are also placed throughout the tool to navigate to the different tabs. Only the tabs for the method selected to meet the PLE requirement have to be completed.

- Tab 1: [Instructions](#)
- Tab 2: [Annual Unrounded Requirement Finder](#)
- Tab 3: [SY 2020-21 Price Calculator](#)
- Tab 4: [SY 2020-21 Non-Federal Calculator](#)
- Tab 5: [SY 2020-21 Split Calculator](#)
- Tab 6: [SY 2020-21 REPORT](#)
- Tab 7: [SY 19-20 Price Calculator](#)
- Tab 8: [SY 10-11 Price Calculator](#)
- Tab 9: [PLE Guidance](#)

** The tabs (SY 19-20 and SY 10-11 Price Calculators) are for use as needed*

Cells shaded this color designate data entry cells. The SFA must enter the applicable data in these cells for the tool to calculate requirements

Only complete the tabs for the method used for meeting the requirement (raising prices, contributing non-Federal sources, or the split calculator).

SFAs need the following data to calculate the Weighted Average Price for SY 2020-21:

- 1.) SY 2019-20 Weighted Average Price
- 2.) SY 2010-11 Weighted Average Price, if the SY 2019-20 Weighted Average Price is unknown
- 3.) All student paid lunch prices for October 2019
- 4.) Number of paid lunches served associated with each student paid lunch price in October 2019

SFAs that opted to contribute non-Federal sources for SY 2020-21 need:

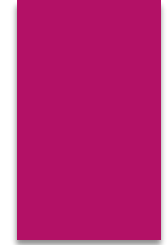
- 1.) SY 2010-11 Weighted Average Price, as needed
- 2.) SY 2019-20 Weighted Average Price (if different from SY 2010-11 Weighted Average Price)
- 3.) Total number of student paid lunches served in SY 2018-19
- 4.) The total dollar amount of non-Federal contributions through SY 2019-20

SY 2020-21 WEIGHTED AVERAGE PAID LUNCH PRICE CALCULATION

These instructions are for SFAs increasing their weighted average prices to meet the SY 2020-21 paid lunch price requirement

NON-PROGRAM FOODS

- ▶ All revenue from the sale of non-program foods accrues to the non-profit school food service account.
- ▶ Revenue available to support the production of reimbursable school meals does not subsidize the sale of non-program foods.
- ▶ A non-program food is a food sold in a participating school other than a reimbursable meal and is purchased using funds from the school food service account.
- ▶ SFAs are required to determine if the percent of total revenue that is generated from their non-program food sales is equal to or greater than the percent of total food costs that are attributable to the SFA's purchase of non-program foods.



Nonprogram Revenue Calculator		
Enter the cost for reimbursable meal, cost of nonprogram food and total revenue		
Cost for Reimbursable Meal Food		
Cost of Nonprogram Food		
Total Food Costs	\$	-
Total Nonprogram Food Revenue		
Total Revenue		
Minimum portion of revenue from nonprogram funds		0%
Minimum Revenue Required from the Sale of Nonprogram Foods	\$	-
Additional Revenue Needed to Comply	\$	-

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To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [How to File a Complaint](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter 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;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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