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=07bc9b888b904a958d07eb9e9e2937bf
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

- 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 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.
**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.
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
- Color
- Sex
- National origin
- Age
- Disability
PROFESSIONAL STANDARDS:
HIRING AND TRAINING
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**

- **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.

<table>
<thead>
<tr>
<th>Position</th>
<th>Required Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Directors</td>
<td>12 Hours</td>
</tr>
<tr>
<td>Managers</td>
<td>10 Hours</td>
</tr>
<tr>
<td>All Other Staff</td>
<td>6 Hours</td>
</tr>
<tr>
<td>Part-Time Staff (work &lt;20 hours/week)</td>
<td>4 Hours</td>
</tr>
</tbody>
</table>

[https://fns-prod.azureedge.net/sites/default/files/cn/profstandards_flyer.pdf](https://fns-prod.azureedge.net/sites/default/files/cn/profstandards_flyer.pdf)
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
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.

http://arc-sos.state.al.us/cgi/actdetail.mbr/detail?page=act&year=1999&act=434&x=0&y=0
## Training Hour Summary

### USDA

<table>
<thead>
<tr>
<th>Employee Type</th>
<th>Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Directors</td>
<td>12</td>
</tr>
<tr>
<td>Managers</td>
<td>10</td>
</tr>
<tr>
<td>Full Time Staff</td>
<td>6</td>
</tr>
<tr>
<td>Part-Time Staff</td>
<td>4</td>
</tr>
</tbody>
</table>

### ALSDE (Public Schools Only)

<table>
<thead>
<tr>
<th>Employee Type</th>
<th>Hours/Days</th>
</tr>
</thead>
<tbody>
<tr>
<td>Directors</td>
<td>15 hours</td>
</tr>
<tr>
<td>9, 10, 11 Month Employees</td>
<td>2 Professional Development Days</td>
</tr>
</tbody>
</table>

- 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.
CNP employee list

Certificates of completion

Education achievement certificates (i.e. diplomas)

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

<table>
<thead>
<tr>
<th>Minimum Requirements for Directors</th>
<th>Student Enrollment</th>
<th>Student Enrollment</th>
<th>Student Enrollment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2,499 or less</td>
<td>2,500-9,999</td>
<td>10,000 or more</td>
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<tr>
<td><strong>Minimum Education Standards</strong></td>
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<tr>
<td>Bachelor’s degree, or equivalent</td>
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<tr>
<td>educational experience, with</td>
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<tr>
<td>academic major in specific areas;</td>
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<td>OR</td>
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<tr>
<td>Bachelor’s degree in any academic</td>
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<tr>
<td>major, and State-recognized</td>
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<tr>
<td>certificate for school nutrition</td>
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<tr>
<td>directors;</td>
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<tr>
<td>OR</td>
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<tr>
<td>Bachelor’s degree in any academic</td>
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<tr>
<td>major, and at least 1 year of</td>
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<tr>
<td>relevant school nutrition programs</td>
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<td>experience;</td>
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<td>OR</td>
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<tr>
<td>Associate’s degree or equivalent</td>
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<tr>
<td>educational experience, with</td>
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<tr>
<td>academic major in specific areas;</td>
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<tr>
<td>and at least 1 year of relevant</td>
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<tr>
<td>school nutrition programs</td>
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<td>experience;</td>
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<td>OR</td>
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<tr>
<td>High school diploma (or GED) and</td>
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<tr>
<td>at least 3 years of relevant</td>
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<tr>
<td>experience in school nutrition</td>
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<td>programs.</td>
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<tr>
<td>(For an LEA with less than 500</td>
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<td>students, the State agency may</td>
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<tr>
<td>approve a candidate who meets</td>
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<td>the educational standards but has</td>
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<td>less than the required 3 years</td>
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<td>experience.)</td>
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<tr>
<td><strong>Minimum Prior Training Standards</strong></td>
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<td>At least 8 hours of food safety</td>
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<td>training is required either not</td>
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<td>more than 5 years prior to their</td>
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<td>starting date or completed within</td>
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<td>30 days of the employee’s start</td>
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<tr>
<td>date.</td>
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</tbody>
</table>

*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.

[https://fns-prod.azureedge.net/sites/default/files/cn/profstandards_flyer.pdf](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 an 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
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.
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
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

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cost for Reimbursable Meal Food</td>
<td></td>
</tr>
<tr>
<td>Cost of Nonprogram Food</td>
<td></td>
</tr>
<tr>
<td><strong>Total Food Costs</strong></td>
<td>$ -</td>
</tr>
<tr>
<td><strong>Total Nonprogram Food Revenue</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Total Revenue</strong></td>
<td></td>
</tr>
<tr>
<td>Minimum portion of revenue from nonprogram funds</td>
<td>0%</td>
</tr>
<tr>
<td>Minimum Revenue Required from the Sale of Nonprogram Foods</td>
<td>$ -</td>
</tr>
<tr>
<td>Additional Revenue Needed to Comply</td>
<td>$ -</td>
</tr>
</tbody>
</table>
USDA NONDISCRIMINATION STATEMENT

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

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) 690-7042; or
(3) email: program.intake@usda.gov.

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