

HACCP Q&A – April 2006

(updated 1/09)

Implementation

- 1. I know the law states that our food safety (HACCP) plan must be fully implemented by the end of this school year. Can I still have one of your trainers provide an in-service on HACCP for my staff over the summer?**

If you feel that additional training would be helpful, we strongly encourage you to utilize our trainers and all of our resources on www.kn-eat.org over the summer or when school starts again. Keep in mind that many of our HACCP trainers are school food service directors and they will be very busy in August.

- 2. Do I need to submit my HACCP plan or any part of it to KSDE?**

No. However, if you designed your own monitoring form (for section 4 of your plan) and it is **significantly different** from the version provided by KSDE, we suggest that you submit the form to your area KSDE Child Nutrition Consultant to assure that it is acceptable.

- 3. Who is going to look at my HACCP plan?**

Your area KSDE Child Nutrition Consultant is responsible for evaluating your written HACCP plan and they will do this as part of regular program reviews. Also, the law requires the Kansas State Department of Agriculture to conduct two inspections per year at every site that participates in the National School Lunch Program and/or School Breakfast Program. Their inspectors will ask to see your written plans and they will more fully evaluate how well food safety procedures are being implemented in your food service areas.

Foods

- 4. Are condiments such as catsup, mustard, pickles and margarine in the Process 1 category or are they “other” foods?**

They are “other” foods. Most condiments do not need to be put into a process category because they do not meet the definition of “potentially hazardous” and are not commonly associated with food borne illnesses. Potentially hazardous foods support the **rapid** growth of harmful microorganisms and can make a person sick if left in the temperature danger zone for more than four hours.

- 5. Are salad dressings in the Process 1 category or are they “other” foods?**

Commercially prepared salad dressings (including those that are cream based) are considered “other” foods because they do not meet the definition of ‘potentially hazardous’ due to their pH value and water activity/ a_w content.

Dressings made from scratch or containing dairy products (such as milk added to dry seasonings), are considered potentially hazardous (unless the site has documentation to prove otherwise). These dressings are Process 1 foods and must be held cold (below 41 degrees F) during service **or** all procedures for ‘time as a control’ must be used. (See our March HACCP Help newsletter for a list of the required procedures.)

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- 6. Do we need to record the temperatures of fresh fruits and vegetables (e.g. on a salad bar or on the serving line)? Is it a problem if these foods are not kept under 41 degrees F?** USDA's guidance says that fresh fruits and vegetables should be classified as 'Process 1' foods. This is because food borne illnesses can be transferred to the consumer on the surfaces of fresh fruits and vegetables. Therefore, we will very strictly enforce the 'no bare hand contact' rule. We recommend you use the Standard Operating Procedure (SOP) provided on washing fresh fruits and vegetables as it is written or with very few modifications.

Holding some fresh fruits and vegetables below 41 degrees F deteriorates the quality (e.g. lettuce), taking the temperature of some is difficult (e.g. baby carrots in a bag), and these are not the foods most likely to make your customers sick. Therefore, we will not require that temperatures of fresh produce be recorded and we will not be overly concerned if these items are not held under 41 degrees F **except for cut melons and cut tomatoes** which are potentially hazardous foods and must be kept at 41 degrees or below.

- 7. How do we handle canned fruit? Is it a Process 1 or "other" food?** USDA's guidance says that canned fruits should be classified as 'Process 1' foods. Canned fruit is not potentially hazardous and it is not commonly associated with food borne illness. As with fresh fruits and vegetables, KSDE will not strictly enforce taking temperatures of canned fruit in Kansas schools.
- 8. If we pre-chill canned fruit and then serve it unchilled (so it warms up slightly during service), can we refrigerate it and serve the leftovers the next day?** Yes. Canned fruit is not a potentially hazardous food. It is a food that you choose to refrigerate because it makes it more pleasant to eat and because it extends its shelf life. Allowing it to warm up and then cooling it down does not violate any Kansas Food Code rules.

Temperatures

- 9. I attended a conference recently and heard that the temperature danger zone is now 41 to 135 degrees F. Is that true for schools too?** The 2005 Kansas Food code has been published and the upper limit of the temperature danger zone has dropped from 140 to 135 degrees F.
- 10. How often do I have to record the temperature of my dish machine?** USDA's guidance does not require temperatures of dish machines to be recorded, so you do not have to record them at all. However, HACCP experts all recommend that dish machine temperatures be recorded daily. Child Nutrition & Wellness, KSDE recommends (but does not require) that Kansas schools take dish machine temperatures weekly or monthly depending on the age of the machine and number and type of problems normally experienced with it. Explain your procedures in an SOP and/or in the recordkeeping section (Section 6) of your food safety (HACCP) plan. See next question and answer for additional information.

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11. Can I use the temperature shown on the gauge on my dish machine or should I use an independent temperature device?

As explained in the previous answer, you are not required to record any temperature from the dish machine so using the temperature gauge is acceptable. However, it is not the most accurate. HACCP experts recommend using an independent temperature device such as a t-stick (disposable, plastic thermometer which can be held between the tines of a fork) or waterproof digital thermometer. Child Nutrition & Wellness, KSDE recommends a combination of methods (i.e. **looking at** the temperature gauge on a daily basis but **recording** the temperature from an independent temperature device once a week or month, depending on the age of the machine and number and type of problems normally experienced with it.

12. We prepare and set out enough salad bar items (e.g. diced ham, chopped eggs and shredded cheese) for two days. Our salad bar is not temperature controlled but our service period only lasts 2 hours. We take chilled items to the salad bar just before service and return them to the cooler immediately after the serving period. The next day we use the same procedure with the Day 1 leftovers and discard any Day 2 leftovers. The ‘time as a control’ rules allow food to be in the temperature danger zone for up to 4 hours so our procedures are safe, right?

Wrong. During the Day 1 service period, the potentially hazardous foods reach temperatures well into the temperature danger zone (probably 60-70 degrees F after 2 hours). When they are returned to the cooler, they do not instantly return to 41 degrees F, so they remain in the danger zone (while harmful microorganisms continue to grow) for longer than 2 hours (the 2 hour serving period plus the time required to return to 41 degrees F). This means you have less than 2 hours the next day. Unless you take and record the temperatures at regular intervals as the food cools on Day 1, you have no way of knowing how long the food can safely be out for service on Day 2. Therefore, both KSDE and KSDA recommend that ‘time as a control’ only be used for service of food on one day and that leftovers be discarded at the end of that day (specifically four hours after being removed from a hot or cold cooking or storage unit on that day). A solution to the salad bar scenario would be to prepare enough for two days but only set out enough for one day (getting more from the cooler if needed on Day 1 for service) or setting the potentially hazardous items (such as ham, eggs and cheese) in containers with ice to keep them below 41 degrees F.

Receiving

13. Do we need to record the temperatures of a specific number of foods received?

No, you need to record the temperature of a sample of items received. School food service staff (not the vendor or delivery person) determine the size of the sample. It should be enough to ensure that the food being received is safe. Select a few types of products and/or foods stored in a variety of locations on the truck. You do **not** need to check the temperature of one of each type of food, one from each box or follow any other magical formula. Do what you feel is best based on your situation (the supplier, size of shipment, type of food, etc.).

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14. Can the delivery person lend you their thermometer at the time of delivery?

No. You must be 100% sure the thermometer used is accurate and the only way to know that is if the thermometer has been in your possession (and if applicable, has been calibrated correctly and recently).

15. On the SOP for receiving deliveries, it states that the delivery driver's name should be known and verified at the time of each delivery. We're in a big district and it's very difficult to keep up with all of our drivers. Do we really have to do this?

No. The only parts of the SOPs that you absolutely have to do are those from the Kansas Food Code. The other things are strong **recommendations** in order to prepare and serve safe food. Identifying your drivers is strongly recommended by the bioterrorism department at the Kansas State Department of Agriculture as a way to ensure that the food received has not been tampered with between the warehouse and your school. If you choose not to implement this part of the SOP (or any part of any other SOP), be sure that you modify the SOP so that your written plan accurately reflects what you do at each of your sites.

16. Do temperatures of frozen foods have to be taken?

No. The Kansas Food Code only requires that frozen foods be received 'in a frozen state' so you only need to touch them to be sure they are solid to the touch. If you choose to take their temperature for some reason, keep in mind that 32 degrees F is the freezing point of **water**. Most foods require colder temperatures (-10 to 0 degrees F) to remain in a frozen state.

17. Can we accept a delivery of frozen items (such as ground beef) that is not received 'in a frozen state?'

Yes, you may accept the delivery if it shows only slight signs of thawing, **and** the food is something that will be thawed before cooking anyway, **and** you can continue to immediately thaw it, **and** you can use it within a safe period of time. Never refreeze something that has begun to thaw.

18. At what temperature should cold (refrigerated) foods be received?

Cold (refrigerated) foods must be received at or below 41 degrees F (or 45 degrees F for milk or shell eggs). If above this temperature, take additional temperatures to determine if food is safe and delivery should be accepted (i.e. maybe it was just one or a few items in a particular location in the box or truck). Accept the delivery if other temperatures are at or below 41 degrees F (or 45 degrees F for milk and shell eggs). Reject the delivery if other temperatures are above 41 degrees F (or 45 degrees F for milk and shell eggs).

19. At what temperature should hot foods be received?

Hot foods must be received (e.g. from a production kitchen) at or above 135 degrees F.