

EMERGENCY PLAN FOR FOOD DEFENSE

**FOR
MARIN COUNTY**

SCHOOL DISTRICT

**Model Annex
to
Marin Schools Emergency Management Plan**

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Marin County Schools Emergency Plan for Food Defense

Marin Schools Model Emergency Management Plan

The Marin Schools Emergency Management Plan consists of several components including the Model Plan, Appendices with Checklists, Forms, Sample Memos and Agreements, and Annexes. The Emergency Annex for Food Defense is an incident management strategy that serves to augment the Marin Schools Emergency Management Plan. In order to ensure efficient and effective emergency management, the Model Plan must be implemented in its entirety.

I. OVERVIEW

Children are a high risk population for foodborne illness. Both natural disasters and human-caused mistakes have the potential to contaminate the food supply, debilitate food service facilities and cause disease. These incidents include weather-related emergencies (e.g., flood, earthquakes, drought, heat wave, extended power outages), processing errors, and intentional contamination.

Food safety addresses the accidental contamination of food products during processing or storage by biological, chemical or physical hazards. The main types of food safety hazards are microbes, chemicals and foreign objects. This unintentional contamination of food products can be reasonably anticipated based on the type of processing.

Food defense is defined as the protection of food products from intentional adulteration by the introduction of chemical, biological, physical or radiological agents into the food, water or facilities by individuals seeking to endanger the public health of students and school staff. Protecting food from intentional contamination is a relatively new concern. School foodservice facilities have multiple vulnerabilities and present an attractive target for those seeking to inflict widespread harm.

Food defense is a collective term used by the Food and Drug Administration (FDA), United States Department of Agriculture (USDA), and Department of Homeland Security (DHS) to encompass activities associated with protecting the nation's food supply from deliberate or intentional acts of contamination or tampering. Intentional contamination of food services could cause far reaching emergency throughout the

school community. Food defense addresses ways to limit the opportunity for someone to intentionally contaminate food for the purpose of causing harm or death.

A. Purpose of the Plan

The purpose of this annex is to provide a comprehensive guide on how to identify and respond to deliberate or intentional acts of tampering with or contamination of the school's food supply. This annex includes information on hazard detection, measures to minimize the risk of intentional contamination, contingency planning, response initiation and maintenance of a safe environment for the students, food service volunteers and staff.

This plan will:

- Supply effective strategies to assess the risk of an attack and identify control measures to minimize the threats;
- Provide a National Incident Management System (NIMS) framework for school planning and response to an incident that jeopardizes food safety and public health;
- Define triggers to implement the plan, and
- Identify the appropriate level of response.

This plan does not address:

- Disruptions affecting food service operations due to equipment failure;
- Outbreak of sporadic food-borne illness and isolated occurrences which constitute normal and expected background levels of disease in a community;
- Failure in sanitation or temperature control;
- Critical limits of time and temperature ranges for food preparation and service (either cold or hot) to assure food safety;
- Failures to follow standard operation procedures (SOPs) or temperature controls, expiry dates of stored food, personal hygiene, proper storage of food to help keep food safe;
- Food recall and spoilage;
- Natural, weather-related disasters (e.g., floods, blizzards, earthquakes, wildfires)
- Rolling blackouts, gas or electrical outages, kitchen fires, interruption of computer or utility services
- Break in the water line
- Interruption of food or supply delivery.

B. Planning Assumptions

Local health departments have the legal authority and primary responsibility for verifying the safety of food and water in their jurisdictions. These duties include the identification and control of human disease outbreaks, environmental health inspections of food service establishments, and determining response capacity and capabilities.

Response to all emergency events will be National Incident Management System (NIMS) compliant.

In the case of intentional contamination, communication between federal agencies and public health personnel will be maintained. Federal agencies will have primary responsibility for all criminal investigations, while state and local public health personnel maintain control over epidemiological response.

A deliberate act of contaminating the food pathway may have grave consequences, and encompasses a variety of response actions at all levels of government, industry, producers and the private sector.

- Depending on the causative substance of the contamination, contaminated foodstuffs may need to be considered and handled as hazardous waste.
- Suspected infected facilities and transport vehicles may need to be cleaned, disinfected and re-evaluated for contamination.

School has developed and implemented Standard Operating Procedures (SOPs), the written instructions for routine food service tasks that affect the safety of food. Control measures (means taken to reduce, prevent or eliminate hazards) and critical control points (CCPs) have been identified.

III. MITIGATION AND PREVENTION

A. Vulnerability Assessment

A vulnerability assessment is necessary to developing a food defense strategy. It is first step in preventing attack and helps close gaps to minimize risks.

“CARVERS” is an acronym for attributes used by the U.S. Food and Drug Administration (USFDA) to provide guidance in identifying areas vulnerable for attack. If the facility meets the following criteria, strengthen prevention strategies:

Critical	- Measure of public health or economic impact of an attack;
Accessible	- Simplicity of physical access to target area;
Recuperable	- Ability of system to recover;
Vulnerable	- Ease by which attack can be accomplished;
Effect	- Amount of direct loss in production;
Recognizable	- Effortlessness in identifying target;
Shock	- Measure of psychological and economic effects

The seven attributes can be ranked on a scale from one to ten. Conditions that are associated with lower vulnerability are assigned values at the low end of the scale (e.g., 1 or 2). Conditions associated with higher vulnerability as a target are assigned higher values (e.g., 9 or 10).

B. Prevention Strategies

“ALERT” is an acronym for a food defense initiative of the USFDA, developed to communicate how to make food defense part of the school operation. ALERT identifies five key points that facilities can use to protect the food supply and decrease the risk of intentional food contamination.

1. **ASSURE that supplies and ingredients are from safe and secure sources.**

- Know your suppliers, particularly those from whom you acquire fresh produce. Purchase all food ingredients, food products, packaging materials, and other foodservice supplies only from reputable suppliers who have appropriate permits or licenses as applicable.

The USFDA ALERT Initiative

- A** - ASSURE that supplies and ingredients are from safe sources.
- L** - LOOK after the security of the products in the facility.
- E** - ESTABLISH an identification system for staff..
- R** - REPORT on the security of products in the facility.
- T** - Notify authorities of any THREAT to the food service.

- Encourage suppliers to practice food defense precautions. Audit suppliers, where practical, for compliance with food defense measures that are included in purchasing and shipping contracts or letters of credit; use a vendor approval program.
- Require all food suppliers, including central kitchens, to use locked and/or sealed tamper-proof containers for foods they ship to your school.
- Maintain a list of phone numbers of alternate suppliers for situations when regular suppliers are unable to provide readily available products. Tell staff where the list is kept.
- Supervise the offloading of incoming materials. The first place to stop contaminated foods from entering the facility is at the time of delivery.

2. LOOK after the security of the products and ingredients in the facility.

- Implement a system for receiving, storing and handling distressed, damaged and returned products. Minimize their potential for being compromised or compromising the safety of other products. Destroy products that are unfit for human consumption, products of questionable origin, and those with illegible codes.
- Track incoming materials and those in use, including ingredients, compressed gas, packaging, labels, salvage products and product returns.
- Store product labels in a secure location and destroy outdated or discarded labels.
- Limit access to storage and handling facilities and controls for airflow, water, electricity and refrigeration.
- Conduct random inspections of storage and handling facilities, vehicles, access to refrigeration water and airflow systems.
- Keep track of finished products.
- Encourage warehousing operations to comply with food security measures.

3. ESTABLISH an identification system for staff.

- Conduct background checks of all staff, including seasonal, temporary, contract and volunteer staff.
- Keep work assignment information updated and know who should be on the premises.
- Provide an appropriate level of supervision to all staff, including maintenance and contract workers, and especially new staff.

- Provide a system of identification for all foodservice staff – uniforms, name tags or badges with individual control numbers for authorized access. Collect all identifiers when an employee is no longer associated with the facility.
- Limit access by staff to areas necessary for their job function and only during appropriate hours. Use key cards or locks for entry to sensitive areas.
- Prevent public access to critical food service areas including receiving, preparation, storage and dishwashing areas.

4. REPORT on the security of products under control of the facility.

- Annually review and verify the effectiveness of the security management system.
- Perform random food defense inspections of all areas of the facility.
- Maintain records to identify the source and subsequent recipients of food.
- Review lessons learned from prior tampering or other malicious, criminal or terrorist actions and threats.

5. Notify authorities of any THREAT to the food service or suspicious behavior.

- Post FDA Alert placards in appropriate place.
- Hold any product that may have been tampered with in a secure area and notify law enforcement officials.
- Contact the Food and Drug Administration or the USDA/Food Safety and Inspection Service. For FDA regulated products, call the FDA 24-hour emergency number at 301-443-1240
- Alternatively, contact the local FDA District Office:
Pacific Region, San Francisco
1301 Clay Street, Suite 1180-N
Oakland, CA 94512-5217
Phone: 510-637-3960
Fax: 510-637-3976

IV.

PREPAREDNESS

Effective preparedness includes establishing policies to regulate access, keeping records current, performing periodic inspections and regular maintenance and training for staff. Reduce the risk of insider compromise by an appropriate level of supervision of staff and volunteers.

A. Security

Outside Facility

- Clearly define the boundaries of school property.
- Ensure proper lighting to monitor the facility at night and early morning.
- Locate parking areas for visitors or guests at a safe distance from the food service facility.
- Clearly mark vehicles of authorized visitors, guest and staff (e.g. placards or decals on display).
- Install self-locking doors and/or alarms on emergency exits.
- Install and monitor security cameras.
- Monitor school property including vehicles (both private and commercial), the air-intake system, loading docks, and school grounds.
- Secure (lock, seal, equip with sensor device) all doors, gates, windows, roof openings, vent openings, and outside refrigeration/storage units at all times when unattended (e.g. after hours/weekends).

Shipping/Receiving

- Assign authorized personnel to verify and receive shipments both during and after business hours.
- Require advance notification from suppliers for all deliveries.
- Inspect all deliveries against a roster of scheduled deliveries.

Preparedness Goals

- Prevent unauthorized access to the facility by individuals or unapproved materials.
- Protect product from intentional contamination throughout the production process.
- Ensure that only authorized personnel are in the facility at any time.
- Respond quickly to a product contamination threat or event using planned actions.

- Refuse or question unscheduled or unexplained deliveries.
- Inspect incoming shipments for potential tampering.
- Inspect the package condition of all ingredients, products and hazardous chemicals prior to accepting shipment. Check for signs of tampering and counterfeiting to assure they are not
- Require photo Identification of delivery drivers.
- Limit access to shipping/receiving areas only to authorized personnel.

Storage Areas

- Secure access to all storage areas. Lock doors or install an alarm.
- Maintain an access log of who has entered the storage area and when.
- Keep accurate inventories of all supplies, food and chemicals to detect and investigate unexplained additions to or withdrawals from recorded stock.
- Inventory packaging materials to prevent theft and misuse.
- Periodically examine material in storage for evidence of tampering.
- Control access to labels and packaging materials to prevent theft and misuse.

Data Systems

- Control access to computers
- Eliminate access immediately when staff employment ends
- Install adequate firewalls and virus protection systems
- Maintain frequent back-up procedures
- Validate computer security system
- Establish traceable computer transactions

Food Production and Service Areas

- Identify areas critical to the food production process that may be particularly sensitive to potential adulteration. Examples include bulk storage containers, blenders/mixers or large batch operations. Security measures for these areas include:
 - restrict access only to authorized staff;
 - conduct staff background investigations;
 - implement operational controls, such as monitoring sensitive operations/ equipment, or locking bulk storage containers.

- Create a diagram or map that defines the boundaries of all foodservice areas as well as locations of specific activities within each area. This should include self-service snack bars and vending machines, if applicable.
- Determine which foodservice areas should be restricted , e.g.:
 - food storage areas
 - chemical storage rooms
 - critical production areas where products are mixed or produced in large batches
- Mark the restricted foodservice areas clearly.
- Define who is allowed within restricted areas and when.
- Develop procedures for controlling entry and access by all non-foodservice staff such as school administrator, principals, teachers, maintenance staff, parents, students, and visitors.
- Prohibit use of foodservice areas for special or public events unless operated by the regular foodservice staff. Allowing unknown and untrained people to use the area decreases the security of the foodservice operation.
- Restrict and control access to central controls for airflow, heating, ventilating and air conditioning systems (HVAC), water supply, electricity, and gas within foodservice areas.
- Alarm emergency exits and self-locking doors that can be opened only from the inside per local and state fire and building codes.
- Ensure that at least one authorized staff member is present in the foodservice area at all times when the area is not secure.
- Lock the school cafeteria when not in use.

B. Supervision

Foodservice Personnel

- Maintain a daily roster of foodservice personnel and distribute it to school and foodservice supervisors.
- Issue to all authorized foodservice personnel, whether paid or volunteer, identification tags, colored aprons or hats, to be worn whenever working in the food facility.
- Require color-coded aprons/uniforms for work areas.

- Maintain dual control – always have two people present.
- Establish a system of identification of visitors and other personnel.
- Be alert to unusual or suspicious behavior of all staff and foodservice volunteers.
- Encourage reporting of unusual activities.
- Track unusual absenteeism trends and be alert for changes in staff health condition.
- Account for all keys provided to current staff.
- Account for all keys, uniforms and identification badges provided to former staff.
- Promptly restrict access of terminated staff.

Best Practices

- Prohibit bare hand contact with ready-to-eat (RTE) foods.
- Require hand washing after restroom use, sneezing, coughing or after performing any cleaning activity;
- Exclude ill personnel by policy from food production or preparation areas.
- Develop procedures for providing safe and secure substitute meals, including procedures for feeding students at alternate sites.
- Chaperone any non-staff in the food preparation area. Must have valid reason for visit. Restrict what they can bring in or remove from the facility.
- Prohibit use of the food assembly counters for non food-related activities to inhibit potential for contamination.
- Prohibit personal food in the schools refrigerator. Discourage food brought from home for distribution to students in the classroom.
- Track complaints/comments for trends.

Awareness Initiative of USFDA: Employees are the FIRST Line of Food Defense

- F** - FOLLOW schools food defense plans and procedures.
- I** - INSPECT your work area and surrounding areas.
- R** - RECOGNIZE anything out of the ordinary.
- S** - SECURE all ingredients, supplies, and finished product
- T** - TELL management about anything unusual or suspicious.

Procedures to inhibit intentional contamination of the food supply:

- Do not open or handle mail in the foodservice area.
- Inspect ingredient packages prior to use for evidence of tampering. Examples of evidence are a broken seal (for unopened packages) or discoloration of food inside package (for leftover and resealed packages).
- Prohibit outside food and medications in foodservice areas (for example, “personal” foods or food brought in for storage or reheating by students and staff. That includes celebratory birthday cakes.) Provide an alternate storage location outside the food service area for celebratory cakes and other personal food items.
- Prohibit the use of foodservice areas for “special events” such as parent/teachers dinners or public events unless operated by the regular foodservice staff. Allowing the foodservice facility to be used by unknown and untrained people decreases the security of the whole foodservice operation.
- Document where ingredients and foods are stored and prepared in the foodservice operation. If an ingredient or food is determined to be contaminated, you need to be able to trace where that item is, where that item was, and where it came from. Use an inventory record/log to track this.
- Monitor all foodservice areas for signs of suspicious activity or unauthorized entry. This includes self-service areas such as buffers and salad bars, receiving, outside storage, and solid waste disposal.
- Monitor large batch process operations in the cafeteria.
- Closely supervise personnel working in critical production areas , i.e., near steam-jacketed kettles, bulk mixers, and dry ingredients.
- Secure potential sources of contamination from other areas of the school building. For example, ensure strict control over access to cleaning chemicals used by custodians or reagents in school chemical laboratories.
- Store cooled leftover food items in tightly sealed, clearly labeled, dated containers.
- Establish policy and procedures to discard food or ingredients that are not properly sealed and labeled.
- Implement stock rotation (first in, first out).
- Identify how and where to isolate suspected contaminated food. Designate an area for holding distressed food and food items held for testing. Do not disturb a possible “crime scene”, as evidence may be destroyed.

C. Safety

Standard Operating Procedures (SOPs)

Facility-wide food service SOPs have been developed and are conformed to including but not limited to the following activities:

- cleaning and sanitizing food contact surfaces
- controlling time and temperature during food preparation
- date marking
- employee health policy
- handling a food recall
- personal hygiene
- receiving food deliveries
- labeling, storing, serving and transporting food
- using and calibrating thermometers
- washing fruits and vegetables

Hazardous Chemicals

- Follow manufacturer's instructions for use of hazardous chemicals.
- Store hazardous chemicals in restricted area outside of food preparation areas.
- Maintain a daily inventory of hazardous chemicals; investigate discrepancies immediately.
- Train staff in proper use and disposal of chemicals to prevent accidental food contamination and human exposure.
- Ensure strict control over access to cleaning chemicals used by custodians or to classroom laboratories that may contain reagents, hazardous materials, and microorganisms.

Water and Ice Supply

- Secure (fence or lock) outside access to all water supply and ice-making equipment..
- Control access to the in-house ice-making equipment and ice storage facilities.
- Develop policy and procedures for actions to take if a breach in the water supply security occurs. Identify alternate source(s) of potable water.
- Monitor the drains and water lines in the food production areas periodically.

- Test water and Ice regularly to make sure it is safe to drink. Check with Marin Municipal Water District for assistance.
- Establish a policy or procedures for notifying the local officials responsible for drinking water and the Environmental Protection Agency (EPA) immediately if the water supply might be unsafe to drink or use.

D. Maintenance

Foodservice Equipment:

- Instruct staff to look for signs of wear, tear, and tampering before operating equipment.
- Establish procedures to monitor the operation of foodservice equipment (such as steam-jacketed kettles, steamers, choppers, hot/cold storage systems, or mixers).
- Monitor temperature fluctuation.
- Secure bulk storage containers, particularly those that hold fluid products where a contaminant can be easily added and mixed.
- Keep an emergency supply of disposables for foodservice in case utensils, trays, etc. are contaminated or items cannot be decontaminated.

E. Recordkeeping

- Keep all pertinent information on critical control points, time, temperature, and corrective actions on clip boards in the kitchen for ease of use.
- Develop procedures for tracking all food and ingredients from manufacturer to table. Keep detailed purchase and food production records.
- Replace all applicable forms for daily records on a weekly basis or sooner, if necessary.
- In the case of weekly records, replace forms on a monthly basis.
- Assure that all forms are updated, available for use, and filed properly after completion.
- Archive all completed forms.

NOTE: All recordkeeping logs used in the facility should be filed in an accessible location for foodservice staff to get extra copies when necessary.

F. Training

- Require new staff, including substitutes and volunteers, to complete initial food safety and sanitation training before handling food.
- Provide refresher awareness training for all staff.

Review food safety principles, including SOP guidelines, for all staff on an annual basis.

Train staff to use chemicals properly to prevent accidental food contamination and human exposure.

- Provide training on identifying packaging that could be exposed to adulteration or contaminants.
- Educate foodservice personnel on the process and importance of recording critical information.
- Train staff to recognize and report suspicious activities or unusual observations:
 - Co-workers are not immune to persuasion.
 - It CAN happen here.
 - Those who would do harm are tenacious.
 - Disgruntled, financially struggling personnel could be compromised.
 - Staff may be too trusting.
 - Any changes to the normal working environment may provide opportunity for mischief or harm.
- Maintain training and attendance records on all staff (paid and volunteer) at each facility.

G. Emergency Contacts

- Compile an emergency contact list of authorities. Include the names and phone numbers for specific personnel from each agency or authority.
- Determine which agency or authority would serve as first responder(s). The first responder represents the most important authority that needs to be involved in response to an intentional threat to food safety.
- Establish a relationship with local authorities to contact in relation to biosecurity concerns. Include law enforcement officials, hazardous material (HAZMAT) representatives, environmental health specialists/sanitarians, health officials,

fire and rescue department representatives, or federal food safety regulatory agency representatives (FDA or FSIS) and Homeland Security officials.

- Distribute the emergency contact list to appropriate school staff.
- Post the emergency contact list in a secure yet prominent place; make it available in hard copies, wallet cards, and on an intranet system.
- Ask key staff to program the emergency contact numbers into their telephones.
- Verify and update emergency contact information often. Note dates of revisions to prevent confusion.
- Establish procedures for communicating with students, parents, and the media when necessary (for example, notices of incidents or a press release). Follow an established plan as designated by the school board.

IV. RESPONSE

Response is the immediate reaction to a disaster. Certain aspects of the response may take place before the event if it is anticipated. Response yields to recovery.

A. Detection

Indicators of an intentional foodborne outbreak at school:

- Observation of suspicious behavior or activity by a foodservice worker or volunteer;
- A significant security breach in a food-system facility, storage tank or shipping vehicle, or receipt of a threat (via a telephone call or piece of mail) indicating that an agricultural or food product has been or will be contaminated;
- Discovery of foreign items in food during routine inspection and /or laboratory analysis of food supplies.
- Discovery of a physical characteristic of a food item that suggests possible contamination with a biological or chemical agent (e.g., presence of an unidentified and unexpected powder, a bad odor or an abnormal taste);
- Reports of unusual clusters of illness among students and staff, possibly related to a food product. Symptoms include: diarrhea, vomiting, stomach cramps, blurred vision and headache.

Central kitchens have the main characteristics of a vulnerable target:

- large batches
- thorough mixing
- short shelf-life
- wide distribution
- access to facility

VULNERABLE FOODS*

- | | | |
|------------------|---------------|-----------------|
| • Baby food | • Deli salad | • Milk |
| • Bottled water | • Flour | • Peanut butter |
| • Breaded food | • Fruit juice | • Produce |
| • Canned food | • Honey | • Soft drinks |
| • Cooked seafood | • Ice cream | • Yogurt |

* Food Defense: FDA's Role in Protecting America's Food Supply; International Symposium on Agroterrorism (May 2005)

B. Contamination Response

Expedite response to contamination to prevent unnecessary panic:

- Suspend operations until all products and/or agents have been identified.
- Direct anyone affected with health issues to the school nurse or appropriate medical personnel.

- Account for the contaminated food. Take accurate inventory by location of affected food and food products.
- Identify number and scope of potential and probable exposures.
- Isolate and secure the contaminated food.
- Notify administrative authorities and local health department. Follow reporting protocols.
- Do not destroy contaminated products until advised to do so by the local Public Health Department, FDA or FSIS. Hold some samples for analysis.
- If the food product is to be destroyed on-site, determine the procedures for on-site destruction of food products, who should be present, and who must be notified of the process.
- Identify spokesperson for the incident.
- Identify key messages.
- Collect health-related information needed for public communications to parents and the community.
- Communicate information about the contamination to the school community and any other stakeholders:
 - Whether any contaminated food was served;
 - Where and to whom it was served;
 - Date food was served;
 - Possibly physical symptoms;
 - Medical response – only health professionals should provide medical advice;
 - Actions being taken.
- Clean and sanitize facilities and equipment.
- Document actions, submit data and appropriate forms.

VI.

RECOVERY

Recovery includes the process to review where the vulnerability breach occurred and implement corrective actions

A. After Action Review

- Implement sanitization and disinfection procedures
- Deploy solid waste disposal plans
- Review processes and incident communication protocols
- Identify where the vulnerability occurred
- Review impact on the school and community
- Evaluate lessons learned
- Review and revise procedures, as needed
- Consider how to restore confidence in the school's food and nutrition program
- Retrain staff
- Determine immediate and long-term changes needed
- Identify funding sources for the changes
- Refit and upgrade facilities, as needed

B. Document Archive

Maintain all information for the current year and the three prior years:

- Reports provided to the local Public Health Department or other government agencies
- Inventory of contaminated food
- Reports showing to when food was served and to whom
- How food was secured to prevent further use
- How food was destroyed
- Reports from students and staff with symptoms of physical illness
- Actions taken

APPENDIX A

School Food Defense Risk Assessment Checklist

	YES	NO	Not Applicable
OUTSIDE FACILITY			
1. Facility boundaries clearly identified to indicate limited access areas?			
2. Measures in place (e.g. fencing, other barriers) to prevent unauthorized access?			
3. Outside lighting adequate to monitor the facility at night?			
4. Access to restricted areas secured and controlled (locks, sensors, access cards)?			
5. Security cameras installed outside the facility?			
6. Staff parking area secured and monitored?			
OTHER NOTES and ASSESSMENTS			
SHIPPING AND RECEIVING			
1. All suppliers have a permit or license?			
2. File of reputable suppliers maintained?			
3. Drivers/delivery personnel trained in security procedures?			
4. Advance notification required from suppliers for all deliveries			
5. Roster of scheduled deliveries maintained?			
6. Transport vehicles secured to prevent deliberate contamination of food products/supplies?			
7. Transport vehicles and procedures routinely monitored to ensure security procedures are being followed?			
8. Access to shipping/receiving areas limited only to authorized personnel?			
9. Procedures in place for verifying deliveries during and after business hours?			
10. Procedures in place for delivery personnel entering the facility?			
11. Documented procedures in place for inspecting deliveries to assure they are tamperproof and intact prior to entry?			
12. Incoming products and supplies inspected for signs of tampering, contamination or damage prior to entry?			
13. Products, supplies re-inspected after opening and prior to use?			
14. Open doors monitored during production and hours of operation?			
15. A system in place for segregating, handling and returning distressed and damaged products?			
16. Incoming materials tracked?			
OTHER NOTES and ASSESSMENTS			
STORAGE AREAS			
1. Access to all storage areas secured with locks or alarms?			
2. Access log kept for all personnel who enter the storage area?			
3. Inventories maintained of all supplies, food and chemicals?			
4. Access to labels and packaging materials controlled to prevent theft and misuse?			
5. Materials in storage periodically examined for evidence of tampering?			
6. Personal use of food storage area prohibited by written policy?			
7. Hazardous chemicals stored in a restricted area away from food preparation?			
8. A daily inventory of hazardous chemicals maintained?			

9. Cleaning compounds, hazardous and restricted materials kept in secured / locked areas only accessible to authorized personnel?			
10. An emergency plan identifying off site areas where products and ingredients are stored such as coolers, freezers and warehouses?			
OTHER NOTES and ASSESSMENTS			
DATA SYSTEMS			
1. Access to computer systems controlled?			
2. Firewalls and virus protection software installed?			
3. Transaction and inventory data backed up regularly?			
4. Computer transactions traceable and trackable?			
OTHER NOTES and ASSESSMENTS			
FOOD PRODUCTION & SERVICE AREAS			
1. Access to food production area controlled and restricted to authorized staff?			
2. Restricted food service areas identified by signage?			
3. Policies and procedures for controlling access by non-foodservice staff established and distributed?			
4. Non-staff always chaperoned when they enter the food preparation area?			
5. Access to central controls for HVAC systems restricted and controlled?			
6. All water, ice supplies identified, tested for potability?			
7. Emergency procedures in place if the water supply is cut off?			
8. Use of foodservice area for special events prohibited unless operated by regular foodservice staff?			
9. Areas where large amounts of product are exposed (including kettles, tanks and coolers) restricted to only production personnel?			
10. Presence of an authorized staff member required in the foodservice area when the area is not secure?			
11. School cafeteria locked when not in use?			
12. Procedures in place to restrict access by contract service providers such as sanitation crews, pest control operators, building maintenance staff or facility repair contractors?			
13. Emergency exits have self-locking doors with automatic alarms?			
OTHER NOTES and ASSESSMENTS			
PERSONNEL			
1. Procedures in place for screening new foodservice applicants and volunteers, including reference and background checks?			
2. Authorized foodservice personnel (paid and volunteer) issued identification tags, badges, aprons or uniforms?			
3. Aprons or uniforms required for work areas?			
4. Orientation training provided to new staff (paid and volunteer), including emergency procedures such as evacuation and response protocols for bomb threats, chemical spills, suspected product tampering or other security threats?			
5. A daily roster maintained of staff (paid and volunteer) work schedules?			
6. All staff been trained in proper use and disposal of chemicals to prevent accidental food contamination or human exposure?			
7. Employees required to work in pairs when preparing products without supervision present?			
8. A system in place for identification of visitors and other personnel?			
9. All keys provided to staff accounted for?			

10. Staff members have a designated and secure storage area for personal items?			
11. Procedures outlined for investigating reported food security incidents?			
12. Procedures in place for employee termination including turning in badges, IDs, keys, and restricting access?			
OTHER NOTES and ASSESSMENTS			
COMMUNICATION			
1. A procedure established for reporting unusual activities?			
2. A procedure in place for submitting and tracking complaints and comments?			
3. Procedures developed for communicating with staff and the media?			
4. Notification procedures developed for students and school families?			
5. FDA Alert placards posted in appropriate places?			
6. All completed forms, reports, complaints, alerts, notifications, reports and other records archived?			
7. An emergency contact list of authorities maintained and updated annually?			
OTHER NOTES and ASSESSMENTS			

APPENDIX B Online Resources

California Department of Public Health: Food Defense and Security – Food and Drug Branch

<http://www.cdph.ca.gov/pubsforms/Guidelines/Pages/FDB%20FoodSecurity.aspx>

FDA: Food Defense and Emergency Response

<http://www.fda.gov/Food/FoodDefense/default.htm>

FDA: Reportable Food Registry

<http://www.fda.gov/ReportableFoodRegistry>

Food Biosecurity Checklist (Bergen County Technical Schools)

http://rems.ed.gov/docs/repository/REMS_000073_0001.doc

National Coalition for Food Safe Schools: Creating Food Safe Schools: A How To Guide

http://www.foodsafeschools.org/FSAG_CD/Summary_Book_Final_5-5-05.pdf

National Food Service Management Institute: Emergency Readiness Plan: Guide and Forms for School Foodservice Operations

<http://www.nfsmi.org/ResourceOverview.aspx?ID=61>

National Food Service Management Institute: Responding to a Food Recall

<http://www.olemiss.edu/depts/nfsmi/Information/RespondingFoodRecall.html>

National Food Service Management Institute: Resources

<http://foodbiosecurity.nfsmi.org/Resources.php>

RTI International and USDA FSIS: Food Defense Plan – Security Measures for Food Defense

http://www.fsis.usda.gov/PDF/General-Food-Defense-Plan-9-3-09%20_2_.pdf

USDA: A Biosecurity Checklist for School Foodsafe Plans

<http://healthymeals.nal.usda.gov/hsmrs/biosecurity.pdf>

USDA: Food and Nutrition Service - Food Safety

http://www.fns.usda.gov/fns/food_safety.htm

USDA: Food Defense and Emergency Response

http://www.fsis.usda.gov/Food_Defense_&Emergency_Response/index.asp

USDA: Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles (June 2005)
<http://www.fns.usda.gov/cnd/CNlabeling/Food-Safety/HACCPGuidance.pdf>

USDA FSIS: Developing a Food Defense Plan for Meat and Poultry Slaughter and Processing Plants (updated June 2008)
http://www.fsis.usda.gov/pdf/food_defense_plan.pdf

USDA School Food Service: Food Security and Emergency Preparedness
http://healthymeals.nal.usda.gov/nal_display/index.php?info_center=14&tax_level=2&tax_subject=231&topic_id=1194

APPENDIX C ACRONYMS

CDC	Centers for Disease Control and Prevention
DHS	Department of Homeland Security
DHHS	Department of Health and Human Services
EPA	Environmental Protection Agency
FDA	Food and Drug Administration (an agency of the U.S. Department of Health and Human Services, DHHS)
FNS	Food and Nutrition Service (an agency of USDA responsible for administering the National School Lunch Program; School Breakfast Program; Summer Food Service Program; Child and Adult Care Food Program; Food Stamp Program; Food Distribution Program; and Women, Infants, and Children Program)
FSIS	Food Safety and Inspection Service (UDDA)
HACCP	Hazard Analysis and Critical Control Point – a systematic approach to the identification, evaluation and control of food safety hazards, based on hazard analysis, determination of critical limits, monitoring and verification procedures, corrective actions and recordkeeping
HVAC	Heating, ventilating and air conditioning system
NFSMI	National Food Service Management Institute
NIMS	National Incident Management System
NSLP	National School Lunch Program
OPHS	Office of Public Health and Safety (DHHS)
RTE	Ready-to-eat (e.g. prepared foods)
SOPS	Standard Operating Procedures- written step-by-step instructions for a food service task to reduce food safety hazards
USDA	United States Department of Agriculture
USFDA	United States Food and Drug Administration