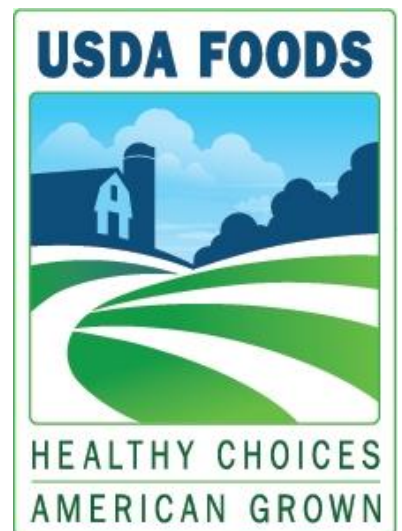


Responding to a Food Recall

Procedures for Recalls of USDA Foods



Responding to a Food Recall

This project has been funded at least in part with Federal funds from the U.S. Department of Agriculture, Food and Nutrition Service through an agreement with the National Food Service Management Institute at The University of Mississippi. The contents of this publication do not necessarily reflect the views or policies of the U.S. Department of Agriculture, nor does mention of trade names, commercial products, or organizations imply endorsement by the U.S. government.

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INTRODUCTION

A large volume and variety of foods are used for school meals programs. These foods may come from two sources: USDA Foods (formerly called commodity foods) and commercially purchased foods. USDA Foods account for approximately 20% of the food used in schools; the remaining 80% is purchased by State Agencies and local Recipient Agencies from the commercial market. Although the United States food supply is among the safest in the world, sometimes food may be unsafe or mislabeled. When there is reason to believe food is unsafe, or mislabeled, the food is recalled, or otherwise removed, from commerce.

The food recall process for school meals programs differs depending on whether the recall affects USDA Foods or commercially purchased foods. This manual was developed to provide an overview of the recall process for USDA Foods with a focus on school meals programs. Particular attention is given to the roles of various entities in communicating information to ensure that recalls are handled in a timely and effective manner.

THE FOOD RECALL PROCESS

Types of Recalls

A recall occurs when action is taken to remove a food from the market because there is evidence that it is unsafe, adulterated, or mislabeled. Food recalls are classified according to the level of risk that would be posed to the health of those who might consume the food. Table 1 defines and provides examples of the food recall classifications.

Table 1. Food Recall Classes

Class	Definition	Examples
Class I	A health hazard situation where there is a reasonable probability that eating the food will cause serious, adverse health consequences, or death.	<i>E. coli</i> O157:H7 in ground beef; <i>Salmonella</i> in peanut butter; Food with an undeclared allergen
Class II	A health hazard situation where there is a remote probability of adverse health consequences from eating the food.	Product containing a foreign material
Class III	A situation where eating the food will not cause adverse health consequences.	Minor labeling problems, such as improper format or undeclared ingredients that are not allergens

The Role of Federal Regulatory Agencies

In the United States, two federal agencies are responsible for regulating the food supply: the Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA), and the Food and Drug Administration (FDA) of the United States Department of Health and Human Services (DHHS). These two agencies, FSIS and FDA, are responsible for ensuring the safety of food. FSIS regulates meat, poultry, and egg products. FDA regulates all other food, including fruits, vegetables, and dairy products.

A food recall almost always is a voluntary action initiated by a food manufacturer to remove food from commerce that may cause health problems, or death. The regulatory agency oversees the recall process to assist the company in ensuring that appropriate actions are taken to protect public health. Both FSIS and FDA conduct effectiveness checks, or audit checks, respectively, to verify that the recalling company was diligent in notifying its consignees (customers) of the need to retrieve and control recalled product, and that the consignees responded accordingly. As part of an effectiveness or audit check, FSIS or FDA may choose to contact State Distributing Agencies, School Food Authorities, and/or schools to verify that these entities received recall information and took appropriate action.

Both FSIS and FDA are authorized to take administrative actions that can require a recall. Such actions are rare, but may be necessary if, for example, a company refuses to recall a food that may pose a health hazard.

Determining the Need for a Recall

Food that is adulterated, or mislabeled, is subject to recall. When food is adulterated, it may be impure, unsafe, or unwholesome; contain a pathogen (for example, *Salmonella*), a foreign material (for example, plastic), or an undeclared allergen; or there may have been a packaging failure. Food may be recalled as a result of hazards detected through:

- Manufacturers' tests or observations
- Test results from product sampling by the regulatory agency
- Field inspections, or investigations, by regulatory agencies
- Epidemiologic data (data on the occurrence of disease in a population) collected by local or state public health departments or federal agencies, such as the Centers for Disease Control and Prevention (CDC), that are linked back to a particular food

If a regulatory agency finds that food has microbiological or chemical adulteration, or has statutory violations, such as mislabeling, it presents the evidence to the manufacturer and asks the manufacturer to recall the product. Once a food recall is announced by the manufacturer,

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typically through a press release, the manufacturer is required to notify all of its affected consignees. FSIS and FDA alert consumers about food recalls through press releases, notices posted on their respective websites, and notices posted on www.foodsafety.gov/recalls.

Communication of Food Recalls

Typically, a manufacturer will notify all of its consignees about a recall as part of the recall process; however, if necessary, the regulatory agency can require a manufacturer to do so. If a manufacturer's customer further distributed the recalled product, then that customer is responsible for notifying all entities that subsequently received the product directly from them. They are responsible because the original manufacturer would not know to whom the product was sent subsequent to the first customer.

For example, a manufacturer of tomato paste recalls a batch of product. That manufacturer notifies companies that purchased the tomato paste. Several of those companies used the tomato paste as an ingredient in soup, spaghetti sauce, pizza, and other food products that were distributed nationally. Each company that used the tomato paste as an ingredient in another product must notify all entities that subsequently purchased those products. This example illustrates the complexity of food distribution and the importance of communication during food recalls.

RECALLS OF USDA FOODS

The USDA Food and Nutrition Service (FNS) administers the nutrition assistance programs through which USDA Foods are distributed. FNS works with State Distributing Agencies (SDAs), also referred to as State Agencies, that administer the programs at the state level. The SDAs work with Recipient Agencies (RAs), including School Food Authorities (SFAs), that may further distribute the food to other RAs, such as individual schools.

Purchasing Agencies

USDA Foods are purchased on the commercial market by the USDA Agricultural Marketing Service (AMS) and the USDA Farm Service Agency (FSA), and in some cases, by the United States Department of Defense (DOD).

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Examples of USDA Foods purchased by AMS and FSA for school meals programs include:

Agricultural Marketing Service	Farm Service Agency
<ul style="list-style-type: none">• Fruits and Vegetables• Beans• Poultry• Egg Products• Beef and Pork• Fish• Fruit and Nut Mix	<ul style="list-style-type: none">• Cheese• Rice and Pasta• Cereal and Crackers• Peanut Butter• Peanut Products• Wheat Flour Products• Vegetable Oil

AMS and FSA develop product specifications (or use existing commercial specifications), and enter into contracts with manufacturers to purchase food for school meals programs. As the purchasing agencies, AMS and FSA monitor processing and packaging operations to verify that contract terms and product specifications are met. These agencies also are in direct contact with the federal regulatory agencies in the event of food safety problems. When AMS or FSA learns about a food safety problem, or a food recall, that affects USDA Foods, each notifies FNS.

DOD purchases fresh fruits and vegetables for distribution in USDA school meals programs and manages the distribution of these products to SFAs. If a food safety issue is associated with these products, DOD can trace the products from the producer to the customer.

Rapid Notification for Recalls of USDA Foods

Administrative and Specification Recalls

In an administrative recall, the USDA may decide to remove products from distribution when it decides safety is a concern, even though the products technically meet purchase specification requirements and are free to move in commercial distribution channels. FNS notifies the SDAs of these administrative recalls, and the USDA coordinates product removal, replacement, and expense reimbursement.

USDA Foods that do not meet product specifications may voluntarily, or at the USDA's request, be recalled. If the recall is at the direction of the USDA, FNS will notify the affected SDAs. The vendor, working with AMS or FSA, is responsible for retrieving and promptly replacing the identified USDA Foods, and reimbursing SDAs/RAs for transportation and storage expenses.

FNS uses the Rapid Alert System (RAS) in the Web-Based Supply Chain Management (WBSCM) system to notify SDAs rapidly about recalls involving USDA Foods. When USDA Foods are recalled, FNS develops a notification message for SDAs in WBSCM that is delivered through the

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RAS. The notification message includes specific product identification information to help SDAs track the food.

In addition, FNS established the USDA State Emergency Notification System (SENS) for the SDAs to use when communicating to the RAs about recalls that affect USDA Foods. SENS is designed to provide a rapid notice between the SDA and its RAs.

Communication through the RAS in WBSCM

The RAS is part of WBSCM and is used to notify SDAs about recalls of USDA Foods. In accordance with the FNS Commodity Hold and Recall Procedures, each SDA must assign at least one food safety contact (State Food Safety Coordinator), and alternate, who will be contacted in the event of a recall. When a recall occurs, the following procedures are initiated:

- FNS creates a case in WBSCM. The case includes specific information about the recalled food. This information may include the vendor name, contract number, sales order number, purchase order number, ship-to city, and quantity. General instructions on how affected product should be handled also may be included. This information is linked to the RAS.
- The RAS sends the FNS recall notification, with the case information, directly to all food safety contacts in each affected state. Food safety contacts are notified by telephone, e-mail, or fax until the list of contact options is expended.
- The food safety contact at the SDA checks WBSCM to determine the details of the recall.
- The SDA modifies the FNS message so that it meets the situation in that state and sends the message to the RAs.
- The SDA uses WBSCM to report information to the USDA on the amount of affected product they received that already had been served, and how much of the product remains in inventory.

Communication through USDA SENS

The USDA SENS allows SDAs to notify RAs rapidly through phone, email, text message, or BlackBerry PIN about recalls and other food safety emergencies. This system can be used only by SDAs to send notifications about USDA Foods to RAs. SDA participation is voluntary; features in the system can be customized for each SDA. SDAs can modify FNS messages to meet the needs of their specific situation. For more information about USDA SENS, contact the FNS Office of Food Safety at foodsafety@fns.usda.gov.

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FNS Recall Communication Methods

FNS uses a variety of methods to communicate information about recalls of USDA Foods. It also provides information about recalls of commercial foods that may have been purchased locally by RAs, but are not USDA Foods.

The following lists illustrate the various methods of communication that FNS uses to notify SDAs and the general public about food recalls that may affect RAs, such as SFAs and schools. The difference between the two lists depends on whether the recall affects USDA Foods or commercial foods that might have been purchased locally by RAs.

To communicate recall information about USDA Foods, FNS:

- Activates the RAS in WBSCM and notifies SDAs that received the recalled product.
- Sends an email to FNS Regional Office food safety contacts and asks them to forward the information to their respective SDA contacts.
- Posts an announcement in the recalls forum on the WBSCM homepage.
- Posts an announcement to the FNS Food Safety website at <https://www.fns.usda.gov/ofs/food-safety>. The FNS Food Safety website also features the FoodSafety.gov widget, which displays the latest recall and alert notifications from FSIS and FDA.
- May use social media, such as Twitter and USDA Blogs.
- May send an email notification through the public Commodity Alert System. *This system is designed for the general public. To register to receive notices about recalls through the Commodity Alert System, visit www.envoyprofiles.com/USDA-ALERTS/*
- May send an email to GovDelivery subscribers. *This system is designed for the general public. To register for food safety email updates through GovDelivery, visit <https://public.govdelivery.com/accounts/USFNS/subscriber/new>.*
- May provide partner organizations, such as the School Nutrition Association and the American Commodity Distribution Association, with information to share with their membership.
- May contact the Department of Education and request that recall information be posted to their Crisis Communication System, or website. This approach is reserved for crises of significant public health proportions.

To communicate recall information about a commercial food (i.e., non-USDA Foods), FNS **may**:

- Send an email to FNS Regional Office food safety contacts with information to send to SDA contacts.
- Post an announcement in the recalls forum on the WBSCM homepage.

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- Post an announcement to the FNS Food Safety website at <https://www.fns.usda.gov/ofs/food-safety>.
- Use social media, such as Twitter and USDA Blogs.
- Send an email to GovDelivery subscribers.

On an ongoing basis, FNS encourages all SDAs and RAs to sign-up for food safety recall alerts from FSIS and FDA through www.foodsafety.gov/recalls.

Reporting Complaints about USDA Foods

It is important to send complaints about USDA Foods to your State Agency, so that the State Agency may, in turn, report them to USDA FNS. Sometimes, a complaint involves a food safety concern and sometimes the complaint reflects a quality issue. It is important to have a good feedback system in order to respond quickly to food safety concerns and improve product quality. All complaints reported to the State Agency should include as much detail as possible. Photographs also may be submitted. Information to be provided in a complaint includes:

- Product name and number
- Description of the problem
- Date your agency received the product
- Quantity of product involved
- Quantity and physical address of product remaining
- Purchase Order Number
- Sales Order Number, including Sales Order Line Item Number
- Advance Shipping Notification Number
- Any lot numbers or can codes printed on the packaging
- Establishment number of the plant processing any meat, poultry, or egg product
- Your name, address, and phone number
- If complaint comes from someone else, report their name and contact information
- Report of any illness or injury (ask if a doctor was seen, or if the health department conducted an investigation)
- Photograph of foreign object or problem
- Measurements of the foreign object

Until further directed by the State Agency, the following items should be retained:

- Original container or packaging
- Foreign object
- Any uneaten portion of the food. (Confer with the State Agency to determine if food should be kept refrigerated or frozen).

Recall Communication Process for USDA Foods

Recalls of USDA Foods almost always are part of a bigger recall of commercial food products because USDA Foods are produced by the same manufacturers that sell to the commercial market. Because a number of federal agencies work together to regulate, procure, and distribute USDA Foods, the recall communication process can be very complex. Rapid, accurate communication among all entities - federal agencies, SDAs, RAs, processors, and distributors - is critical. The exact flow of information may vary depending on how the recall evolves, but FNS follows these general steps when a food recall is announced that affects USDA Foods (the steps also are summarized in Figure 1 on page 14):

1. FSIS or FDA, after working with the manufacturer of the recalled product, issues a press release.
2. FNS confers with the regulatory agency, and AMS or FSA, depending on the food recalled, to determine whether any USDA Foods are involved.

When **USDA Foods are involved in the recall**, FNS does the following:

- Obtains purchase information for the affected USDA Foods from AMS or FSA.
- Uses the RAS in WBSCM to notify SDAs that received affected USDA Foods. Notices are sent, as soon as possible, but within 24 hours of the recall notification, and include the recall notice, press release, and product identification information needed to track the product.
- Contacts all processors that received bulk USDA Foods for further processing directly from the USDA and alerts them to the recall (for example, a processor that received USDA-purchased cheese that will be used for making pizza for schools). Only the processor knows where those end products are in the

Product Identification

Specific product identification information must be provided by the manufacturer so that recalled product can be identified accurately. Specific product information may include:

- Company name
- Brand name
- Case markings
- Establishment number (for meat, poultry, or egg products)
- Product markings
 - Can codes
 - Lot numbers
 - Product dating, such as sell-by date or use-by date

NOTE: The UPC code is not adequate for identification because it only gives the product name and not lot or code numbers.

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distribution system; therefore, the processor is responsible for notifying all of their customers who purchased end products containing the recalled food. These notices must be sent as quickly as possible, ideally in 24 hours or less. The recall communication process for foods diverted for processing is described in the next section.

3. After receiving a RAS alert from FNS, SDAs must notify all RAs, in-state processors, and state contracted distributors that received the recalled USDA Foods as soon as possible, but no later than 24 hours after receiving the recall notification. Because FNS order and delivery records track USDA Foods only to the SDA, it is important that the SDAs notify all RAs. SDAs should initiate their own communication to the RAs using USDA SENS, or some other communication tool.
4. RAs must notify all entities as soon as possible, but ideally within 24 hours of receiving the SDA notice, when those entities received recalled USDA Foods directly from them, including contracted distributors. For example, a school district may have distributed the USDA Foods to individual schools, transferred it to another agency, or redirected it for further processing. In any case, the RA must notify each recipient of the recall.
5. RAs, immediately upon receiving notification of the recall, must isolate and label the recalled product so that it is not used. RAs should conduct an inventory to determine the amount of product:
 - Served
 - Remaining in inventory at schools, warehouses, and with their distributors
 - Further distributed to program participants
 - Redirected for further processing

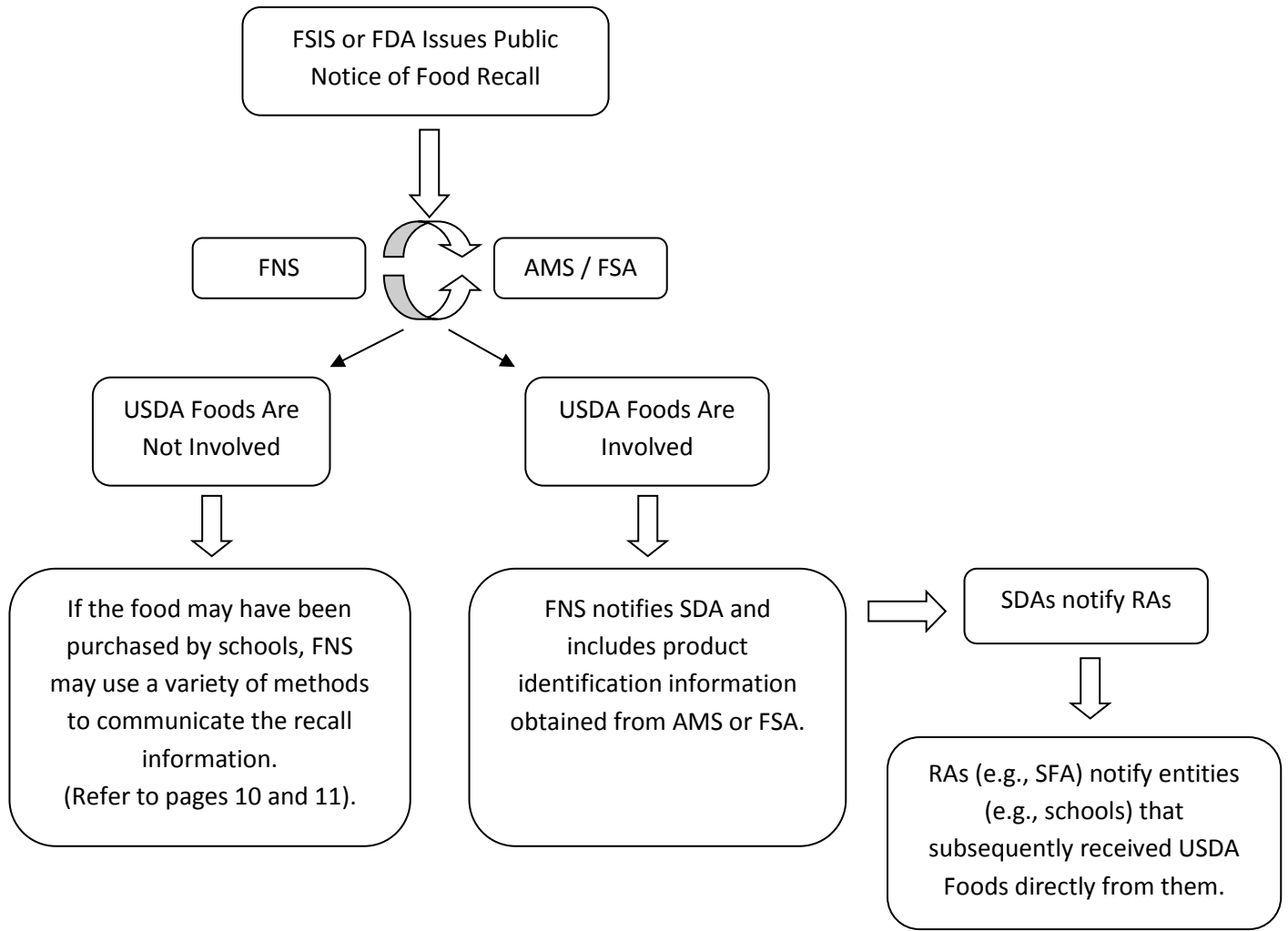
RAs should return inventory information to SDAs as soon as possible, ideally in 48 hours or less.

6. SDAs compile inventory information from all entities – RAs, processors, and state contracted distributors, and report it to FNS in accordance with FNS instructions. This information is used for reimbursement of eligible costs associated with the recall.

When a food recall is announced that does not affect USDA Foods, but FNS determines that the affected food may have been purchased by SDAs, SFAs, or schools through commercial channels, FNS may use a variety of methods to communicate the recall information. These methods are described on pages 10 and 11. Additional action is not taken by FNS because only SFAs, themselves, know what commercial foods were purchased.

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Figure 1. Flowchart of FNS Food Recall Notification Events for USDA Foods and Commercially Purchased Food



Recall Communication Process for USDA Foods Diverted for Processing

Many USDA Foods are sent to processors to be made into finished products used in school meals programs. For example, chicken might be sent to a processor to make chicken nuggets or patties, or ground beef might be sent to a processor to make hamburger patties. The decision to send USDA Foods to a processor may be made at the federal, state, or school district level.

Processors may substitute USDA Foods with like quantities of domestically produced, commercially purchased food. The commercially purchased food must be of the same generic identity (i.e., cheddar cheese for cheddar cheese) and of equal or better quality as the USDA

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Foods. Substitution regulations can be found in 7 CFR Part 250 (Part 250 of Title 7 of the Code of Federal Regulations).

When USDA Foods diverted for processing are involved in a recall, the recall communication process becomes more complex. Processors are the only ones who know whether recalled USDA Foods were produced for RAs, or substituted with commercially purchased food, and where they were sent. Processors are responsible for maintaining records of all consignees in order to trace the further distribution of their products. They also are responsible for notifying their consignees about the recall and should do so quickly. As with any recall, timely communication is critical, and when processors are involved, they play an important role in the communication process.

The following sections outline the general communication steps that are followed when USDA Foods that were diverted for processing are recalled. Each communication step between entities should occur immediately, ideally in 24 hours or less. It is important to remember that the recall communication process for USDA Foods includes inventory reporting. SDAs are responsible for accurately collecting and reporting to FNS all inventory information about processed and finished USDA Foods. This reporting system is summarized in Figure 2. This information is used for reimbursement of eligible costs associated with the recall. Eligible costs are subsequently outlined in the Reimbursement of Costs Incurred by State and Recipient Agencies section on page 22.

Recall Communication Steps for USDA Foods Shipped to Processors with USDA National Processing Agreements

Under a USDA National Processing Agreement (NPA), FNS holds an agreement with the processor and approves all end products that will be manufactured under the agreement. Communication steps may vary depending on how the recall evolves, but NPA processors follow these general steps:

1. NPA processors are contacted directly by FNS about the USDA Foods recall and provided with product identification information to help identify the recalled food.
 - FNS also notifies SDAs that ordered the affected food about the recall using the RAS in WBSCM. SDAs are made aware that because processors may have substituted the recalled USDA Foods with commercially purchased food, or a different lot of food from another SDA, they may not have actually received finished products affected by the recall.
2. The NPA processor determines whether the recalled product was used to produce finished products for RAs, or was substituted with commercially purchased food.
3. The NPA processor notifies FNS of the findings.

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4. If recalled USDA Foods were substituted with commercially purchased food, the recall is considered a commercial recall and FNS does not track the finished products.
5. If recalled USDA Foods were used to make finished product for RAs, these procedures are followed:
 - The NPA processor notifies all SDAs, RAs, and distributors that received the affected product directly from them. If the processor does business with SDAs that did not receive the affected product, the processor also contacts those SDAs to alert them about the recall and confirm that they did not receive recalled product.
 - Distributors immediately notify RAs about the recall.
 - Distributors provide information to the NPA processor, and the entity that contracted with them to distribute the food (i.e., processor, SDA, or RA), about the quantity of product remaining in their inventory, and the quantity of product delivered to each RA.
 - RAs are responsible for providing information about the quantity of product in their inventories directly to the SDA.
 - The NPA processor compiles information received from each distributor regarding the quantity of product remaining in the distributor's inventory, and the quantity of product shipped to each RA.
 - The NPA processor reports all quantity information to the SDA.
 - The SDA is responsible for reporting to FNS all quantity information received from processors and RAs.
 - Often, during a recall of USDA Foods, the USDA will request that the NPA processor also report quantity information directly to FNS.

Recall Communication Steps for USDA Foods Shipped to In-State Processors

Under a state agreement, the SDA negotiates bids and/or prices, selects the processor and the end products which will be produced, and enters into an agreement with the processor. Communication steps may vary depending on how the recall evolves, but in-state processors follow these general steps:

1. In-state processors are notified by the SDA about the USDA Foods recall (SDAs are notified by the USDA FNS). In-state processors will be provided with product identification information to help identify the recalled food.
2. The in-state processor determines whether the recalled food was used to make finished products for RAs, or if it was substituted with commercially purchased food.
3. The in-state processor notifies the SDA of their findings, and the SDA provides this information to FNS.

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4. If the recalled food was substituted with commercially purchased food, the recall is considered a commercial recall and FNS does not track finished product.
5. If the recalled food was used to make finished products for RAs, these procedures are followed:
 - The in-state processor notifies the SDA, RAs, and distributors that received the affected product directly from them.
 - Distributors immediately notify RAs about the recall.
 - Distributors provide information to the in-state processor, and the entity that contracted with them to distribute the food (i.e., processor, SDA, or RA), about the quantity of product remaining in their inventory, and the quantity of product delivered to each RA.
 - RAs are responsible for providing information about the quantity of product in their inventories directly to the SDA.
 - The in-state processor compiles information received from each distributor regarding the quantity of product remaining in the distributor's inventory, and the quantity of product shipped to each RA.
 - The in-state processor reports all quantity information to the SDA.
 - The SDA is responsible for reporting to FNS all quantity information received from in-state processors, and RAs.

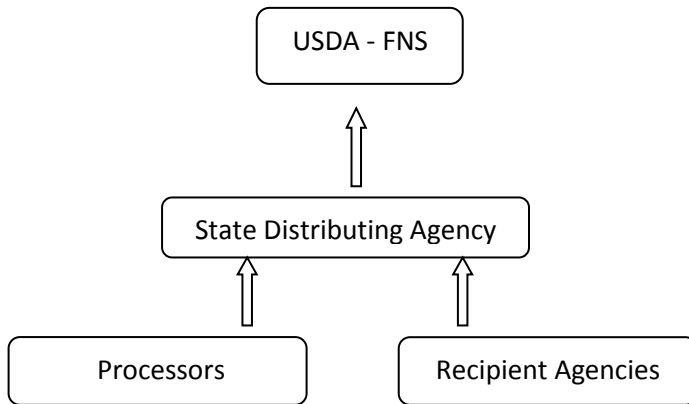
Recall Communication Steps for USDA Foods Shipped to RAs and Redirected for Further Processing

Under a recipient agency agreement, the RA (e.g., an SFA or school) enters into an agreement with the processor and purchases end products from that processor. Communication steps may vary depending on how the recall evolves, but RA processors follow these general steps:

1. The RA is notified by the SDA about the USDA Foods recall.
2. RAs that have redirected recalled USDA Foods for further processing are responsible for contacting all further processors.
3. The RA is responsible for reporting to the SDA the identity and quantity of the product that was redirected and produced, the amount remaining in their inventory, and the quantity of end-product served.
 - The SDA is responsible for reporting to FNS all quantity information received from RAs.

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Figure 2. Flowchart for USDA Foods Recall Reporting to FNS*



* This is a basic illustration of the flow of communication in USDA Foods recall reporting. As previously noted, USDA NPA processors report information directly to SDAs, and often simultaneously report information to FNS. Additionally, distributors report inventory information directly to processors as well as to the entity that contracted with them to distribute the food.

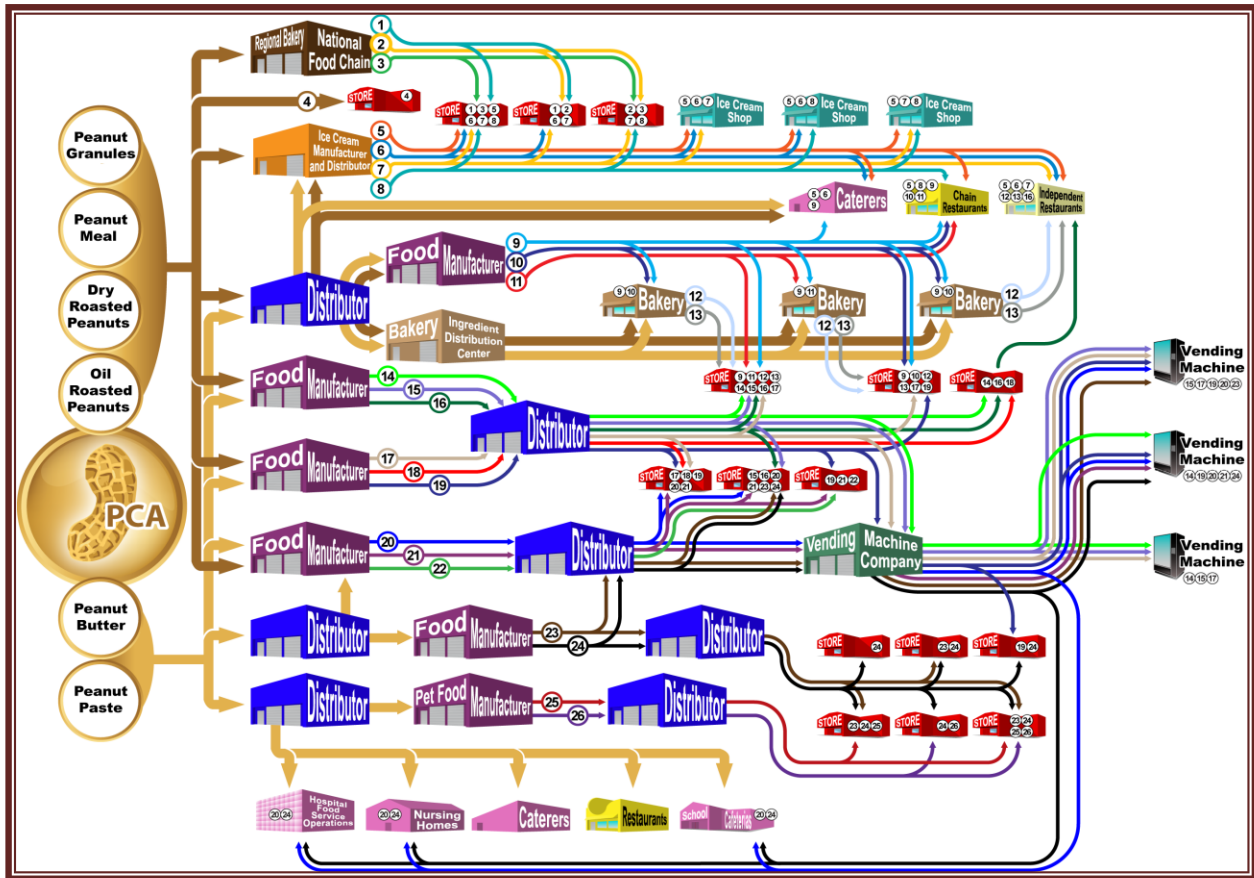
A Food Recall Case Study

It is important to understand that recalls are complex and may proceed in a slightly different way depending on the type of product being recalled and the course of the regulatory agency's investigation. The 2009 recall of Peanut Corporation of America (PCA) products illustrates how complex a food recall can be.

In November 2008, the CDC identified multistate clusters of *Salmonella* Typhimurium infections. In January 2009, an FDA investigation determined that the infections were caused by contaminated peanut products produced by PCA. Ultimately, the investigation resulted in the voluntary recall of more than 2,100 commercial foods, made with PCA products, by more than 200 companies.

Exhibit 1. Peanut Corporation of America: A Case Study outlines the many products and entities involved in the PCA recall, and illustrates the complexity of a recall.

Exhibit 1. Peanut Corporation of America: A Case Study



Source: FDA/CFSAN, David Weingaertner

Inventory Management as a Recall Tool

Inventory management is critical to determining, quickly and accurately, the location of recalled food. An inventory management system must be in place at the SDA and RA levels to know:

- what food is in inventory,
- when it was received,
- where it is stored, and
- when and where it was distributed.

In accordance with 7 CFR Part 250, SDAs, or the storage facilities with which they have contracts, must have inventory systems that separate USDA Foods from commercially purchased foods in order to comply with distribution requirements and regulations. Alternatively, SFAs are allowed to use a single inventory management system, which allows them to store and inventory USDA Foods and commercially purchased foods together. A single

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inventory management system can make product identification more difficult for an SFA during a recall.

For example, an SFA may have an inventory of commercially purchased canned green beans and USDA Foods canned green beans. The USDA Foods and commercially purchased canned green beans may look identical, or similar (i.e., they may have the same company or brand name). In the event of a recall of the USDA Foods canned green beans, the SFA must be able to identify the schools to which the cans were distributed, or whether the cans are still located in a district warehouse. If the SFA uses a single inventory management system, it may be challenging to distinguish which cans of green beans are affected by the recall. It therefore is important for the SFA to review carefully the recall notification sent by the SDA. The recall notification will have specific product identification information (i.e., product markings, such as can codes, lot numbers, and product dating) to help the SFA determine which cans of green beans are affected. While it may seem effective to dispose of all cans of green beans that appear to be involved in the recall, this action is not advised. The SFA will be reimbursed only for USDA Foods received originally.

The Inventory Management and Tracking Reference Guide, developed by FNS and the National Food Service Management Institute (NFSMI), aims to help school nutrition programs incorporate food product tracking into standard inventory management practices that address cost efficiencies, food safety, and effective responses to recalls, foodborne illness, and bioterrorism. This guide may be viewed online at <https://www.fns.usda.gov/responding-food-recall-procedures-recalls-usda-foods>

Other Inventory Management Challenges

RA operational practices may affect inventory management and subsequently affect the RA, SFA, and SDA's abilities to effectively respond to a recall. For example, a school may receive a box containing thirty packages of the same product. The product identification information may be on the box itself, but not on the individual product packages. If the individual packages are removed from the box prior to storage, and the box is discarded, the school may not be able to accurately identify the product in the event of a recall, which may prevent the school, SFA, and SDA from accurately reporting quantities of affected USDA Foods remaining under their control.

Responsibilities of Operators of State-Owned or Contracted Facilities

To manage inventory accurately, state-owned or contracted storage facilities (i.e., warehouses) must:

- Identify USDA Foods
- Document to whom USDA Foods were distributed
- Identify who picked up USDA Foods
- Submit inventory information to the state or owner of the facility (i.e., state or district)
- Conduct an annual review of facilities and document compliance with requirements

Recordkeeping

Accurate and complete records must be maintained by everyone – SDAs, RAs, processors, distributors, and storage facility operators – in order to identify properly USDA Foods that are subject to a recall. The following records should be kept by each entity, as applicable to their operations, with respect to USDA Foods:

- Inventory
- Distribution
- Storage
- Disposal

Processors are responsible for keeping accurate production records in order to identify commingled products, and substituted products. For example, a processor must be able to report if USDA Foods were substituted with commercially purchased foods.

All records must be retained for three years following the end of the federal fiscal year (September 30th). In the event of a USDA Foods recall, if a reimbursement claim has not been resolved by the end of the three year period, records must be retained until the claim is resolved. Reimbursement procedures for costs associated with recalls of USDA Foods are outlined in the next section on page 22.

Destruction and Disposal of Recalled USDA Foods

Through the WBSCM RAS notification, FNS will provide SDAs with general information on how to destroy or dispose of the recalled food. Destruction refers to the process of purposely adulterating the recalled food to render it useless, or inedible. Disposal refers to the process of discarding the recalled food.

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According to the Resource Conservation and Recovery Act (RCRA), the management of solid waste is under the jurisdiction of state and local governments. Requirements for solid waste disposal differ among jurisdictions; therefore, information on proper methods of disposal must be obtained from state or local agencies responsible for environmental protection and/or solid waste regulations. State contacts for programs related to solid waste disposal can be obtained at <https://www.epa.gov/smm/contact-information-regional-wastewise-representatives>.

Verification of destruction is often required to provide accountability to the manufacturer, or to establish the need for product replacement or cost reimbursement. An example of the information needed to verify destruction of USDA Foods is shown in Appendix A.

Reimbursement of Costs Incurred by State and Recipient Agencies

On October 31, 1998, Congress enacted Public Law 105-336, the William F. Goodling Child Nutrition Reauthorization Act of 1998 (the Act). Section 15 of the Act authorizes the Secretary of Agriculture to reimburse SDAs and RAs for costs associated with USDA Foods, if the Secretary determines that the USDA Foods pose a health or safety risk. The law stipulates that reimbursable costs for USDA Foods are limited to:

- Storage
- Transportation
- Processing
- Distribution

It is important to note that no two recalls are alike; therefore, reimbursement costs may vary for different recalls. In the event of a recall of USDA Foods, it is important for the SDA to work closely with the USDA to determine allowable costs for reimbursement.

When USDA Foods are recalled, in most cases, the vendor/processor is responsible for replacing the affected product and reimbursing federal, state, and local agencies for allowable costs incurred as a result of the recall. The USDA will request that vendors compensate those SDAs that have submitted timely documentation (preferably within 20 working days from the recall announcement). Should payment from the vendor not occur, the USDA may reimburse the state and local agencies for specified costs and seek reimbursement of those expenditures from the vendor/processor.

Described below are the types of USDA Foods that may be affected by a recall and a discussion about corresponding replacement and reimbursement instructions:

1. USDA Foods Delivered as Purchased by USDA
(e.g., frozen ground beef purchased and delivered to the SDA as frozen ground beef)

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- The vendor assumes responsibility for replacement and costs incurred by the SDA/RA. If the vendor defaults or delays compensation to the SDA/RA beyond 20 days of the recall notification, the USDA may initiate action to replace the product and reimburse SDA/RAs for certain costs (see page 23) while seeking reimbursement from the vendor.

2. Processed USDA Foods Delivered to SDA/RA

(e.g., bulk chicken processed and made into breaded, cooked chicken nuggets prior to delivery to SDA)

- The USDA may purchase raw product that is diverted for further processing (refer to pages 14-17 for information on types of processing agreements). In some cases, the raw product may be the source of contamination resulting in a health or safety risk and in other situations the source of contamination may be the processing plant. In addition, in some cases the processor may be substituting equivalent commercially purchased food for USDA Foods. Each scenario is unique, and resolution will proceed in the following manner:

Bulk/Raw Product with No Substitution

- When raw product that has already been further processed (end product) is determined to pose a health or safety risk, the USDA Foods vendor is responsible for all costs incurred by the USDA, the SDA and/or RAs, including processing costs pursuant to the terms of the processing contract. Should the vendor default or delay compensation beyond 20 days of the recall notification, the USDA may initiate action to replace the raw product and reimburse SDAs/RAs for processing costs while seeking reimbursement from the vendor.
- The USDA cannot make payments directly to processors – only to an SDA who in turn can pay processors. SDAs should submit copies of paid processor bills, or invoices, with their reimbursement request. In situations where a state has not paid a processor, but the processor has incurred processing expenses, the SDA must work closely with the USDA and the processor to come to an acceptable solution.

Bulk/Raw Product with Substitution

- With USDA approval, processors may substitute commercial product for donated USDA Foods to produce finished end products for SDA/RAs. The processor then may use the USDA Foods to produce commercial product for sale to commercial outlets. In this situation, the recall is deemed commercial and the USDA will not assume

Responding to a Food Recall

responsibility for costs incurred beyond replacement of the implicated USDA Foods. USDA will seek reimbursement from the vendor as in other cases.

End Product (Commercial Recall)

- When the bulk (USDA Foods) product delivered to the processor is safe, but the end product is determined to be a health or safety risk, normally due to a problem at the processing plant, it will be treated as a commercial recall. The processor assumes responsibility for all costs incurred by the USDA, the SDA and/or RAs, pursuant to the terms of the processing contract. USDA will not assume responsibility for costs incurred under these circumstances.

The procedures above were established in 2001 for the reimbursement of processing costs following a recall of USDA Foods. Below are the general procedures for the reimbursement of costs incurred by SDAs and RAs following a recall of USDA Foods. SDAs and RAs must remember that each recall is complex and that reimbursement procedures may vary slightly for each recall.

1. In order to begin the accounting process required for reimbursement, RAs must send original receipts/invoices and a request for reimbursement to the SDA.

Reimbursable expenses may include:

- a. Delivery fees
- b. Storage fees, if the RA contracts with a local storage facility to store USDA Foods and storage is not beyond a time period set by the SDA
- c. Processing fees
- d. Destruction costs (e.g., bleach, plastic garbage bags, dump fees, transportation to the disposal site, and/or landfill charges)

Non-reimbursable expenses include, but are not limited to:

- a. Storage at the school level
- b. Overtime compensation for employees in conducting the recall
- c. Long-distance telephone calls and other associated administrative expenses
- d. Reimbursement for commercially purchased food used in place of the recalled product

2. The SDA combines all individual RA reimbursement requests into one public voucher for that state. SDAs should submit copies of paid processor bills or invoices with their reimbursement request. Only one payment will be issued per state.

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- a. SDAs report data through WBSCM on the amount of recalled food:
 - Served
 - Held or returned to vendor
 - Re-donated
 - Destroyed
 - Unaccounted for
 - b. SDAs will be advised as to any cost reimbursement that will be allowed for processing. In situations where a state has not paid a processor, but the processor has incurred processing expenses, the SDA must work closely with the USDA and the processor to come to an acceptable solution.
3. The SDA submits the public voucher (FSA-21), all supporting original receipts/invoices, and signed destruction forms to the FNS Regional Office. The public voucher must include the SDA's Tax Identification Number (TIN).
(<https://fns-prod.azureedge.net/sites/default/files/fdd/fsa-21.pdf>)
 4. The FNS Regional Office reviews the public voucher claims and documentation for completeness and submits it to the FNS National Office. The Regional Office works with the SDA if any documents are missing, or incomplete.
 5. The FNS National Office reviews the public voucher claims and forwards the information to the AMS.
 6. AMS reviews and **approves the expenses**. Some expenses may be disallowed by AMS.
 7. AMS approves the public vouchers and submits them for payment. As noted in step 2 above, only one payment will be issued per state.
 8. Upon receipt of payment from the USDA, the state reimburses its component RAs (e.g., school districts, distributors, warehouses, and processors) for their specific costs. The USDA cannot make payments directly to processors - only to an SDA who can in turn pay processors or SFAs.
 9. The Food Distribution Division at the FNS National Office coordinates replacement of product or reimbursement of entitlement credit based on amounts reported by the SDA in WBSCM.

QUICK REFERENCE: ROLES AND RESPONSIBILITIES

Purchasing and distributing USDA Foods is a collaborative partnership among federal agencies, SDAs, and RAs, such as local school districts, as well as processors and distributors; all have important roles and responsibilities for USDA Foods in accordance with 7 CFR Part 250, and FNS regulations and policies. Each group's communication responsibilities related to recalls of USDA Foods are summarized below.

Federal Agency Responsibilities

Many federal agencies are involved in the recall process. Players in the process vary, depending on the product involved in the recall. Federal agencies must have recall procedures in place and implement these procedures when necessary. Additional responsibilities at the federal level are listed below.

- The responsible regulatory agency, FDA or FSIS, investigates a food safety problem and works with the food manufacturer in the recall process. The regulatory agency issues a press release and posts recall information to their respective websites and to the www.foodsafety.gov/recalls website.
- FSIS or FDA alerts FNS and the appropriate procurement agency (AMS or FSA) when a recall potentially affects USDA Foods.
- The procurement agency (AMS or FSA) determines whether any of the recalled product was purchased by USDA, the amount of product involved, and the delivery date and location of shipments to SDAs. They also work with the manufacturer to decide whether it will pick up the product, or if SDAs and RAs may destroy small quantities on-site. All information is communicated to FNS.
- FNS notifies SDAs about the USDA Foods recall as quickly as possible, usually within a few hours of receiving the recall alert. SDAs are provided with product identification information needed to help track the affected product. Product identification information may include the vendor name, contract number, sales order number, purchase order number, ship-to city, and quantity.
- FNS contacts processors that received recalled bulk product directly from the USDA and alerts them to the recall.
- FNS, in consultation with the responsible regulatory agency, procurement agency, and vendor, provides general instructions to SDAs on product disposition and the reimbursement process for expenses related to the recall.

State Agency Responsibilities

Each State Agency has the responsibility to:

- Have recall procedures in place.
- Implement the recall procedures upon notification of a recall of USDA Foods.
- Assign a State Food Safety Coordinator and an alternate, and submit the names, titles, email addresses, and telephone and fax numbers of the coordinator and alternate to FNS through WBSCM. To speed the notification process, contact information should be provided for 24 hour access.
- Establish a notification system for food safety contacts at each of its RAs. This system should have two contacts per RA and be verified annually. SDAs may use the USDA SENS, or some other communication system, to notify RAs about recalls.
- Contact RAs as soon as possible, but within 24 hours or less, after receiving a recall notification. To the extent possible, SDAs should confirm receipt of the notification by the RAs to ensure that the message was received and understood. SDAs will provide product identification information needed by RAs to track the product, and instructions on removing and isolating the affected food.
- Provide specific product disposal instructions to RAs. Requirements for solid waste disposal differ among jurisdictions. Information on proper methods of disposal must be obtained from state or local agencies responsible for environmental protection and/or solid waste regulations. State contacts for programs related to solid waste disposal can be obtained at www.epa.gov/epawaste/wyl/stateprograms.htm.
- Contact the in-state processors and state-contracted distributors, directing them to isolate the affected USDA Foods and to determine:
 - the amount of recalled product still in storage for the SDA, and
 - the location and amount of product delivered to RAs.
- Compile inventory data from RAs, processors, and distributors, and submit data to FNS on the WBSCM recall response form in accordance with FNS instructions.
- Complete recall reimbursement claims paperwork, including the destruction verification form (see Appendix A) and the FSA-21 public voucher form with a Tax Identification Number (TIN) (<https://fns-prod.azureedge.net/sites/default/files/fdd/fsa-21.pdf>), and submit paperwork to the FNS Regional Office.

Recipient Agency Responsibilities

Each RA has the responsibility to:

- Have recall procedures in place.
- Implement the recall procedures upon notification of a recall of USDA Foods.
- Assign a food safety coordinator and alternate, and provide the names, titles, email addresses, and telephone and fax numbers of the coordinator and alternate to the SDA.
- Maintain a contact list for RA serving sites, distributors, and other recipients. This list should have two recall contacts per site and be verified annually.
- Notify all sites about the recall immediately, ideally in 24 hours or less, and ensure that the affected products are isolated and labeled “Do Not Use” to avoid accidental use.
- Identify the locations of the affected products, and verify that the products have the correct product identification codes.
- Contact further processors to track redirected food affected by the recall.
- Conduct an inventory assessment, ideally in 48 hours or less, of affected product:
 - Served
 - Remaining in-stock at schools, warehouses, and distributors
 - Further distributed to program participants
 - Redirected for further processing
- Submit the inventory assessment information to the SDA.
- Follow applicable destruction/disposal instructions provided by the SDA.

Processor Responsibilities

Each processor has the responsibility to:

- Have recall procedures in place.
- Implement the recall procedures upon notification of a recall of USDA Foods.
- Identify and isolate all food products produced from the affected USDA Foods immediately upon notification of a recall.
- Contact all SDAs, RAs, and distributors that received affected product directly from them, immediately, ideally in 24 hours or less. Provide specific product identification information to these entities to help them identify affected products. Maintain documentation confirming that entities received the recall message.
- Compile information received from distributors regarding quantity of product remaining at the distributor site, and the quantity of product shipped to each RA. Report information to SDA. USDA NPA processors also will report findings directly to FNS.

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- Notify SDAs with whom they have agreements, but who did not receive affected products, about the recall and confirm that those SDAs are not affected.

Distributor Responsibilities

Each distributor has the responsibility to:

- Have recall procedures in place.
- Implement the recall procedures upon notification of a recall of USDA Foods.
- Identify and isolate affected products still under their control immediately upon notification of a recall.
- Contact entities that received affected product directly from them, immediately, ideally in 24 hours or less. Maintain documentation confirming that entities received the recall message.
- Provide information to the processor and vendor (i.e., the entity that contracted with them to distribute the food) on the quantity of products in storage, and the amount shipped to individual RAs and other entities.
- Dispose of recalled foods under their control in accordance with federal, state, and local regulations and procedures, and in consultation with the processor or vendor. Requirements for solid waste disposal differ among jurisdictions. Information on proper methods of disposal must be obtained from state or local agencies responsible for environmental protection and/or solid waste regulations. State contacts for programs related to solid waste disposal can be obtained at www.epa.gov/epawaste/wyl/stateprograms.htm.

To Get More Information

For more information about recalls of both USDA Foods and commercial foods, sign-up for free recall alert notifications.

USDA Commodity Alert System

Self register for a free email notification of recalls that affect USDA Foods at www.envoyprofiles.com/USDA-ALERTS/

FoodSafety.gov

To find the latest information about food recalls and to sign-up for free email notification of all FSIS and FDA food recalls, visit www.foodsafety.gov/recalls.

GLOSSARY

Agricultural Marketing Service (AMS). USDA agency responsible for procuring some USDA Foods used in domestic nutrition assistance programs.

Adulterated Food. Food of an impure, unsafe, or unwholesome nature. Contaminants may include pathogens, foreign materials, or undeclared allergens.

Centers for Disease Control and Prevention (CDC). Agency of the U.S. Department of Health and Human Services dedicated to the protection of public health. CDC monitors foodborne illness outbreaks, studies the causes of outbreaks, and provides epidemiological data related to outbreaks.

Farm Service Agency (FSA). USDA agency responsible for procuring some USDA Foods used in domestic nutrition assistance programs.

Food and Drug Administration (FDA). U.S. Department of Health and Human Services agency that has regulatory responsibility for foods, except for meat, poultry, and egg products. FDA's Center for Food Safety and Applied Nutrition (CFSAN) works to assure that the food supply is safe, sanitary, wholesome, and honestly labeled.

Food and Nutrition Service (FNS). USDA agency that administers domestic nutrition assistance programs, including the National School Lunch Program (NSLP).

Food Safety and Inspection Service (FSIS). USDA agency responsible for ensuring that the nation's commercial supply of meat, poultry, and egg products is safe, wholesome, and correctly labeled and packaged.

Isolation. The process of removing a food product to a separate area of storage to segregate it from other foods.

Rapid Alert System (RAS). A feature in the Web-Based Supply Chain Management system used by USDA FNS to notify State Distributing Agency contacts about USDA Foods recalls.

Recall. An action by a manufacturer or distributor to remove a food product from the market because it may cause health problems, or death.

Recall Notification Report. Report used by FSIS to release recall information for meat, poultry, and egg products.

Recipient Agencies. Agencies authorized to receive USDA Foods for distribution to eligible recipients, for use in meals served to eligible recipients, or for distribution to other recipient

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agencies in accordance with an agreement with a State Distributing Agency. A School Food Authority is an example of a recipient agency.

Redirect. The process by which a recipient agency receives a food product and subsequently sends that product directly to another entity for further processing. This process also may be referred to as backhauling.

State Distributing Agency (SDA). Agency that administers one or more USDA nutrition assistance programs in a state. Also referred to as the State Agency.

School Food Authority (SFA). Entity at the local level that administers the National School Lunch Program (NSLP) for one or more schools. SFAs receive USDA Foods for use in the NSLP.

USDA State Emergency Notification System (SENS). An emergency notification system provided by USDA FNS for State Distributing Agencies to use voluntarily to notify Recipient Agencies about recalls of USDA Foods and other food safety emergencies. Features in the system can be customized for each State Agency.

Web-Based Supply Chain Management (WBSCM). A web-based system used for ordering USDA Foods and for communicating product information during recalls of USDA Foods.

ADDITIONAL RESOURCES

1. [USDA Commodity Hold and Recall Procedures](http://www.fns.usda.gov/fdd/foodsafety/hold-recallpros.pdf)
(www.fns.usda.gov/fdd/foodsafety/hold-recallpros.pdf)
The commodity hold and recall process is used when a food safety issue is raised about USDA Foods. The process pertains exclusively to USDA Foods delivered to approved entities (recipient agencies and processors).
2. [MOU 225-12-0007: Memorandum of Understanding between USDA and DHHS](http://www.fsis.usda.gov/PDF/USDA_FDA_Info_Sharing_MOU.pdf)
(www.fsis.usda.gov/PDF/USDA_FDA_Info_Sharing_MOU.pdf) or
(www.fda.gov/AboutFDA/PartnershipsCollaborations/MemorandaofUnderstandingMOUs/DomesticMOUs/ucm294512.htm)
This Memorandum of Understanding establishes policies and procedures to enhance the exchange of information between participating agencies of the USDA and the FDA related to food safety, public health, and associated regulatory, marketing, trade, and research activities substantially affecting public health.
3. [MOU 225-11-0012: Memorandum of Understanding between USDA and DHHS](http://www.fsis.usda.gov/PDF/USDA_FDA_Info_Sharing_MOU.pdf)
(www.fsis.usda.gov/PDF/USDA_FDA_Info_Sharing_MOU.pdf - Page 37)
This Memorandum of Understanding establishes a framework for participating agencies of the USDA and the FDA to communicate and cooperate in the timely and full exchange of information to optimize controls essential to minimizing potential for the distribution or use of USDA Foods which may be unsafe.
4. [Poultry Products Inspection Act](http://www.fsis.usda.gov/regulations/Poultry_Products_Inspection_Act/index.asp)
(www.fsis.usda.gov/regulations/Poultry_Products_Inspection_Act/index.asp)
This legislation (public law) outlines the USDA FSIS's regulatory authority related to poultry recalls.
5. [Federal Meat Inspection Act](http://www.fsis.usda.gov/regulations/Federal_meat_inspection_act/index.asp)
(www.fsis.usda.gov/regulations/Federal_meat_inspection_act/index.asp)
This legislation (public law) outlines the USDA FSIS's regulatory authority related to meat recalls.
6. [Egg Products Inspection Act](http://www.fsis.usda.gov/Regulations_&Policies/Egg_Products_Inspection_Act/index.asp)
(www.fsis.usda.gov/Regulations_&Policies/Egg_Products_Inspection_Act/index.asp)
This legislation (public law) outlines the USDA FSIS's regulatory authority related to egg product recalls.

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7. [FSIS Directive 8080.1 – Recall of Meat and Poultry Products](http://www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/8080.1.pdf)
(www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/8080.1.pdf)
This directive provides procedures regarding the voluntary recall of FSIS-inspected meat and poultry products.
8. [FSIS Directive 8410.1 – Detention and Seizure](http://www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/8410.1Rev5.pdf)
(www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/8410.1Rev5.pdf)
This directive provides procedures for FSIS personnel to follow when detaining, or preparing to seize, meat, poultry, or egg products found in commerce that may pose a risk or be in violation with the FMIA, PPIA, or EPIA.
9. [Food Safety Modernization Act](http://www.fda.gov/Food/FoodSafety/FSMA/ucm247548.htm)
(www.fda.gov/Food/FoodSafety/FSMA/ucm247548.htm)
This legislation (public law) outlines the FDA’s regulatory authority related to food recalls.
10. [FSA-21 - Public Voucher](https://fns-prod.azureedge.net/sites/default/files/FSA-0021.pdf)
(<https://fns-prod.azureedge.net/sites/default/files/FSA-0021.pdf>)
The public voucher for commodity programs that States must complete and submit to the USDA for reimbursement of recall expenses.

Appendix A

Sample Form of Information Needed to Verify Destruction of Recalled USDA Foods

Name of State Agency _____

Recipient Agency _____

Commodity	# of Cases Destroyed	Contract #	Destruction Method

Witnesses	Print Name	Signature	Date Destruction Observed:
Witness 1			
Witness 2			

School District Contact Information:

Name and Title _____

Address _____

Phone Number: _____

To document costs associated with the destruction of this recalled product, State Distributing Agencies must complete a Public Voucher (FSA-21) form and attach all original bills/receipts for costs incurred to the assigned FNS Regional Office along with verification of destruction signed by two witnesses, if needed.

Note: This is a sample form. Please modify it to meet your program's needs.

Appendix B

Preparing for a Food Recall

(Sample Standard Operating Procedure (SOP) for School Districts)

PURPOSE: To prepare district- and site-level school nutrition employees to respond to a food recall.

PROCEDURES:

1. Develop and implement an SOP for responding to a food recall at the district-level.
2. Develop and implement an SOP for handling a food recall at the site-level (school-site).
3. Develop a procedure for handling unidentified foods during a recall (i.e., foods that may be removed from original packaging, no longer labeled).
4. Determine which state and local regulations apply to solid waste disposal, specifically disposal of large quantities of food, including open containers of food that may be encountered during a food recall. State contacts for programs related to solid waste disposal can be obtained at www.epa.gov/epawaste/wyl/stateprograms.htm.
5. Train district-level school nutrition employees to use the district-level SOP for responding to a food recall. This training should include instructions on state and local requirements for solid waste disposal.
6. Train site-level school nutrition employees to use the site-level SOP for handling a food recall. This training should include instructions on state and local requirements for solid waste disposal.

Appendix C
Responding to a Food Recall
(Sample Standard Operating Procedure (SOP) for School Districts)

PURPOSE: To prevent foodborne illness or injury by quickly identifying and isolating food products in the event of a food recall.

PROCEDURES:

1. Ensure that an SOP has been developed and implemented to prepare for a food recall that includes training on this SOP (Responding to a Food Recall), and proper food disposal methods (refer to sample SOP for Preparing for a Food Recall). If necessary, re-train or train district-level school nutrition employees on this SOP.
2. Review the food recall notice and specific instructions identified in the notice. Notify the SDA that the notice was received and understood.
3. Check purchasing specifications and receiving documents to identify products matching the product code and lot numbers identified in the recall notice.
4. Prepare instructions for site-level school nutrition employees to follow for handling the recalled product, including:
 - Isolate the product, including any open containers, leftover product, and food items in current production that contain the recalled product.
 - Follow the district's procedure for disposal if an item is suspected to contain the recalled product, but label information is not available.
 - Mark affected product "Do Not Use" and "Do Not Discard." Inform the entire staff not to use the product.
5. Notify all entities that received the affected food (e.g., schools, warehouses, etc.) about the recall as soon as possible, ideally in 24 hours or less.
 - Provide information about procedures, dates, and other specific instructions to be followed for the inventory and collection or disposal of the recalled product.
 - Confirm and document that the message was received and understood (e.g., e-mail with read receipt) by each entity.
6. Inform the school district's public relations coordinator about the recall, and the steps being taken to isolate and dispose of the affected product.
7. Inventory and record:
 - The amount of affected product received by the district.
 - The locations of the affected product, and quantity shipped to each location. When possible, verify that affected items bear the product identification code(s) and production date(s) listed in the recall notice.
 - The status of the affected product (e.g., amount used, amount isolated) at each location.
8. Account for all recalled product by verifying inventory counts against records of food received by the district, and at each feeding site.
9. Report information on recalled USDA Foods to the SDA as soon as possible, ideally in 48 hours or less.
 - Report quantity and location of all recalled product received, and isolated.

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- Submit documentation requested by SDA for recall reimbursement claims.
10. Determine if the recalled product is to be returned and to whom; or destroyed, by whom, and with what documentation.
 11. Do not destroy any USDA Foods without written notification from the State Distributing Agency (SDA), or the state or local health department.
 12. Arrange for food to be collected and disposed of as soon as possible, and within the timeframe identified in the recall notice instructions.
 13. Document reimbursable costs associated with the recall of USDA Foods, and submit to the SDA.

MONITORING:

Visually observe that school-sites have isolated all recalled products, and review all reports returned from each school-site.

CORRECTIVE ACTION:

Retrain any foodservice employee found not following the procedures in this SOP.

VERIFICATION AND RECORD KEEPING

1. Employees will:
 - Record the name, product code, lot number and quantity of the recalled food.
 - Record the date and time of destruction/disposal of the recalled food.
2. The foodservice manager will:
 - Verify that appropriate corrective actions are taken by reviewing, initialing, and dating recall records.
 - Maintain the recall records for a minimum of three years.
3. A school district representative will complete and maintain all required documentation related to the recall including:
 - Recall notice
 - Inventory records
 - Records of how food product was returned or destroyed
 - Reimbursable costs
 - Public notice and media communication.
 - Correspondence to and from the public health department and SDA

DATE IMPLEMENTED: _____ **BY:** _____

DATE REVIEWED: _____ **BY:** _____

DATE REVISED: _____ **BY:** _____

Appendix D

Handling a Food Recall

(Sample Standard Operating Procedure (SOP) for School-Sites)

PURPOSE: To prevent foodborne illness or injury by quickly identifying and containing products in the event of a food recall.

PROCEDURES:

1. Ensure that an SOP has been developed and implemented to prepare for a food recall that includes training on this SOP (Handling a Food Recall), and proper food disposal methods (refer to sample SOP for Preparing for a Food Recall). If necessary, re-train or train site-level school nutrition employees in this SOP.
2. Review the food recall notice and specific instructions identified in the notice. Notify the district office that the notice was received and understood.
3. Check receiving documents, perpetual inventory, requisitions, production records, and shipping records to identify products matching the product code and lot numbers identified in recall notice.
4. Isolate the affected product using the following steps:
 - Isolate the product, including any open containers, leftover product, and food items in current production that contain the affected product.
 - Follow the district's procedure if an item is suspected to contain the recalled product, but label information is not available.
 - Mark affected product "Do Not Use" and "Do Not Discard." Inform the entire staff not to use the product.
5. Inventory and record:
 - The amount of affected product received at the school-site. When possible, verify that affected items bear the product identification code(s) and production date(s) listed in the recall notice.
 - The status of the affected product (e.g., amount used, amount isolated).
6. Report quantity of the affected food used, and isolated, to the district office as soon as possible, ideally in 24 hours or less.
7. Do not destroy any products until directed to do so by a district office official (e.g., School Nutrition Director). If directed to dispose of a product, follow the disposal instructions provided by the district office.
8. Consult with the district office if recalled food was further distributed to additional serving sites to coordinate recall notification and response at these sites. Provide the district office with the serving site locations, quantity of affected food distributed to each location, and dates affected food was distributed.

THE SITE-LEVEL SUPERVISOR (SCHOOL FOODSERVICE MANAGER) WILL:

1. Implement this SOP to respond to a food recall
2. Train site-level employees on using the procedures in this SOP.

Responding to a Food Recall

MONITORING:

Visually observe that employees have isolated and labeled all recalled products.

CORRECTIVE ACTION:

Retrain any employee found not following the procedures in this SOP.

VERIFICATION AND RECORD KEEPING

1. Employees will:
 - Record the name, product code, lot number and quantity of the recalled food received.
 - Record the quantity of affected food used and quantity isolated.
 - Record the date and time of destruction/disposal of the affected food.
2. The foodservice manager will:
 - Verify that appropriate corrective actions are taken by reviewing, initialing, and dating recall records.
 - Maintain the recall records for a minimum of 1 year.
3. A school district representative will update the perpetual inventory record with adjustment for the recalled product.

DATE IMPLEMENTED: _____ **BY:** _____

DATE REVIEWED: _____ **BY:** _____

DATE REVISED: _____ **BY:** _____



National Food Service Management Institute

The University of Mississippi

www.nfsmi.org

Headquarters

Administration Division

Education and Training Division

Information Services Division

The University of Mississippi

6 Jeanette Phillips Drive

P.O. Drawer 188

University, MS 38677-0188

Applied Research Division

The University of Southern Mississippi

118 College Drive #5060

Hattiesburg, MS 39406

Phone: 601-266-5773

Fax: 888-262-9631

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ET116-12