

Responding to a Food Recall

Instructor's Manual

Time: 4 hours



National Food Service Management Institute
The University of Mississippi

2013

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Lesson 1: Introduction to the Basics of the Food Recall Process for USDA Foods

Objectives

At the end of this lesson, participants will be able to accomplish the following:

Objective 1: Differentiate between USDA Foods and foods commercially purchased for use in the School Nutrition Program.

Objective 2: Define a food recall.

Objective 3: List three reasons why a food recall may be initiated.

Objective 4: Name the agencies responsible for purchasing USDA Foods for the School Nutrition Program.

Lesson 2: In-Depth: Food Recalls of USDA Foods

Objectives

At the end of this lesson, participants will be able to accomplish the following:

Objective 1: Describe how it might be determined that a recall of USDA Foods is necessary.

Objective 2: Interpret the differences between the three classes of food recalls.

Objective 3: Explain how schools are notified when there is a recall of USDA Foods.

Lesson 3: Roles and Responsibilities of Agencies during a Recall of USDA Foods

Objectives

At the end of this lesson, participants will be able to accomplish the following:

Objective 1: Name two Federal agencies responsible for ensuring the safety of food and regulating the food supply.

Objective 2: Explain how the two Federal agencies verify that the food recall was implemented effectively.

Objective 3: Differentiate between the responsibilities of the Federal agency, the State agency, the recipient agency, the processor and the distributor during a recall of USDA Foods.

Lesson 4: Standard Operating Procedures during a Recall of USDA Foods

Objectives

At the end of this lesson, participants will be able to accomplish the following:

Objective 1 : Locate the website to use for sign up to receive food safety recalls.

Objective 2: Describe how the communication process is affected when USDA Foods have been diverted for processing or when foods have been shipped to a processor with a national processing agreement.

Objective 3: Evaluate standard operating procedures of a school district to determine acceptability for responding to a food recall.

Lesson 5: Reporting Complaints about USDA Foods

Objectives

At the end of this lesson, participants will be able to accomplish the following:

Objective 1: Describe two reasons why a complaint might be reported regarding USDA Foods provided for the School Nutrition Program.

Objective 2: List information that should be provided if a complaint is filed about USDA Foods used by the School Nutrition Program.

Objective 3: Explain how food should be retained while a food complaint is filed and processed.

Lesson 6: The Role of Inventory Management and Recordkeeping in Food Recalls

Objectives

At the end of this lesson, participants will be able to accomplish the following:

Objective 1: Explain why an inventory management system is important when handling a recall of USDA Foods.

Objective 2: Recognize the impact of the single inventory management system on a recall of USDA Foods.

Objective 3: Describe how food product tracking can be incorporated into an inventory management system.

Objective 4: List four types of records that must be kept regarding USDA Foods.

Objective 5: Recall how long USDA requires that records for recalls of USDA Foods be retained.

Lesson 7: Destroying and Disposing of Foods Involved in a Recall of USDA Foods

Objectives

At the end of this lesson, participants will be able to accomplish the following:

Objective 1: Differentiate between the destruction of and disposal of USDA Foods.

Objective2: Explain why and how destruction of USDA Foods can be verified.

Objective3: Examine a given case study to determine if USDA Foods have been destroyed in accordance with procedures.

Lesson 8: Reimbursement of Costs for Foods Included in a Recall of USDA Foods

Objectives

At the end of this lesson, participants will be able to accomplish the following:

Objective 1: List four types of costs associated with USDA Foods that are reimbursable.

Objective 2: Given a specific situation, identify which agency is most likely to be responsible for replacing affected products and reimbursing local agencies for foods in a recall of USDA Foods.

Objective 3: Explain the procedures that the Federal and State agencies will use to obtain reimbursement for the costs incurred due to a recall of USDA Foods.

Lesson 1-at-a-Glance

Time Allowed	Topic	Activity	Materials
5 minutes	Introduction to Course <ul style="list-style-type: none"> • Welcome • Ground Rules • Course Pre-Assessment • Objectives • Introduce Glossary 	<ul style="list-style-type: none"> • Opening Activity: Customized License Plates 	<ul style="list-style-type: none"> • Slides • Participant's Workbook • PowerPoint Handout • Pre-Assessment • Card Stock for Table Tents • Markers • Glossary • Acronyms List
Objective 1: Differentiate between USDA Foods and foods commercially purchased for use in the School Nutrition Program.			
5 minutes	<ul style="list-style-type: none"> • USDA Foods Definition • 20% of Foods Used in Schools are USDA Foods • 80% Purchased Products 	Small Group Discussion: <ul style="list-style-type: none"> • Discuss USDA Foods Available • How Can You Tell the Difference between Purchased and USDA Foods? 	<ul style="list-style-type: none"> • Slides • Flip Chart Paper • Painters' Tape • Markers
Objective 2: Define a food recall.			
5 minutes	<ul style="list-style-type: none"> • Food Recall Definition • Voluntary Action • Initiation • Purpose 	<ul style="list-style-type: none"> • Discuss Participants' Experience with Food Recalls 	<ul style="list-style-type: none"> • Handout: Notes and Activity Sheet
Objective 3: List three reasons why a food recall may be initiated.			
5 minutes	<ul style="list-style-type: none"> • Unsafe Food • Adulteration • Mislabeling 		<ul style="list-style-type: none"> • Slides
Objective 4: Name the three agencies responsible for purchasing USDA Foods for the School Nutrition Program.			
5 minutes	<ul style="list-style-type: none"> • USDA Agricultural Marketing Service (AMS) • USDA Farm 	<ul style="list-style-type: none"> • Question on Note and Activity Sheet: Who Purchased this Food Item? 	<ul style="list-style-type: none"> • Slides

	<p>Service Agency (FSA)</p> <ul style="list-style-type: none"> • US Department of Defense (DOD) • Functions of Agencies • Examples of Foods Purchased by Each Agency 		
5 minutes	<ul style="list-style-type: none"> • Revisit Lesson Objectives • Lesson Summary 	<ul style="list-style-type: none"> • Check Answers on Notes and Activity Sheet Using the Answer Key Provided 	<ul style="list-style-type: none"> • Handout : Answer Key to Notes and Activity Sheet

Lesson 1 Activity Descriptions:

- Activity 1: Customized License Plates
- Activity 2: Small Group Discussions about USDA Foods in Schools
- Activity 3: Who Purchased this Food Item? Question on Notes and Activity Sheet

Lesson 2-at-a-Glance

Time Allowed	Topic	Activity	Materials
5 minutes		<ul style="list-style-type: none"> Review Objectives 	<ul style="list-style-type: none"> Slides Participant's Workbook PowerPoint Handout
Objective 1: Describe how it might be determined that a recall of USDA Foods is necessary.			
5 minutes	<ul style="list-style-type: none"> Manufacturers' Tests Product Sampling Test Results Field Inspections Epidemiologic Data Administrative Recalls 	<ul style="list-style-type: none"> Question on Notes and Activity Sheet: Analyze Scenarios to Determine which Method Might Be the Basis of the Food Recall. 	<ul style="list-style-type: none"> Notes and Activity Sheet
Objective 2: Interpret the differences between the three classes of food recalls.			
5 minutes	<ul style="list-style-type: none"> Classes Definition of Each Class Examples 	<ul style="list-style-type: none"> Question on Notes and Activity Sheet: Classify Scenarios into the Appropriate Classes of Food Recalls 	<ul style="list-style-type: none"> Handout: Food Recall Classes Notes and Activity Sheet
Objective 3: Explain how schools are notified when there is a recall of USDA Foods.			
10 minutes	<ul style="list-style-type: none"> Rapid Alert System (RAS) in the Web-Based Supply Chain Management (WBSCM) USDA State Emergency Notification System (SENS) What the Message Includes Other Methods of Communication Recalls of Commercial Foods 	<ul style="list-style-type: none"> Small Group Activity: Diagram Flow Chart to Illustrate a Pattern of Normal Communication During a Food Recall 	<ul style="list-style-type: none"> Slides

	Purchased by Schools.		
5 minutes	<ul style="list-style-type: none">• Revisit Lesson Objectives• Lesson Summary	<ul style="list-style-type: none">• Review the Answers on the Notes and Activity Sheet using the Answer Key Provided	<ul style="list-style-type: none">• Slide• Handout: Answer Key to Notes and Activity Sheet

Lesson 2 Activity Descriptions:

- Activity 1: Questions on Notes and Activity Sheet
- Activity 2: Illustration of Communication Patterns During a Food Recall

Lesson 3-at-a-Glance

Time Allowed	Topic	Activity	Materials
5 minutes		<ul style="list-style-type: none"> Review Objectives 	<ul style="list-style-type: none"> Slides Participant's Workbook PowerPoint Handout
Objective 1: Name two Federal agencies responsible for ensuring the safety of food and regulating the food supply.			
5 minutes	<ul style="list-style-type: none"> Regulatory Agencies Food Safety and Inspection Service (FSIS) of USDA Food and Drug Administration (FDA) of the US Health and Human Services (HHS) 	<ul style="list-style-type: none"> Functions of Federal and State Agencies handout 	<ul style="list-style-type: none"> Notes and Activity Sheet
Objective 2: Explain how the two Federal agencies verify that the food recall was implemented effectively.			
5 minutes	<ul style="list-style-type: none"> Oversee the Recall Process Can Take Administrative Action to Require Recall Conduct Effectiveness Checks or Audit Checks 		<ul style="list-style-type: none"> Slides
Objective 3: Differentiate between the responsibilities of the Federal agency, the State agency, the recipient agency, the processor, and the distributor during a recall of USDA Foods.			
10minutes	<ul style="list-style-type: none"> USDA Recall Part of Commercial Recall General Steps in Recall of USDA Foods <ul style="list-style-type: none"> Role of FNS StateDistributing Agency Recipient Agencies 	<ul style="list-style-type: none"> Small Group Activity: Whose Responsibility? 	<ul style="list-style-type: none"> Slides Handout: Roles and Responsibilities Fact Sheet on General Steps in Recall of USDA Foods Fact Sheet on How to Identify Products

			Involved in a Recall of USDA Foods
5 minutes	<ul style="list-style-type: none">• Revisit Lesson Objectives• Lesson Summary	<ul style="list-style-type: none">• Review Notes and Activity Sheet Using the Answer Key Provided	<ul style="list-style-type: none">• Handout: Answer Key to Notes and Activity Sheet

Lesson 3 Activity Descriptions:

- Activity 1: Whose Responsibility? Activity

Lesson 4-at-a-Glance

Time Allowed	Topic	Activity	Materials
5 minutes		<ul style="list-style-type: none"> • Review Objectives 	<ul style="list-style-type: none"> • Slides • Participant's Workbook • PowerPoint Handout • Notes and Activity Sheet
Objective 1: Locate the website to sign up to receive food safety recalls.			
5 minutes	<ul style="list-style-type: none"> • Website • Information Available • Navigation 		<ul style="list-style-type: none"> • Internet Access • Slides
Objective 2: Describe how the communication process is affected when USDA Foods have been diverted for processing or when foods have been shipped to a processor with a national processing agreement.			
5 minutes	<ul style="list-style-type: none"> • Foods Diverted by USDA for Processing <ul style="list-style-type: none"> ○ Who Makes Decision • National Processing Agreements <ul style="list-style-type: none"> ○ Substitutions ○ Examples ○ Distributors ○ NPA Reporting • In-State Processors <ul style="list-style-type: none"> ○ Substitutions ○ Distributors ○ Responsibilities • USDA Foods Redirected by RAs <ul style="list-style-type: none"> ○ RA Responsibilities 	<ul style="list-style-type: none"> • Small Groups Work to Answer Question 16 on Notes and Activity Sheet 	
Objective 3: Evaluate standard operating procedures of a school district to determine acceptability for responding to a food recall.			
10 minutes	<ul style="list-style-type: none"> • USDA Recommended Standard Operating Procedures <ul style="list-style-type: none"> ○ Preparing for a 	<ul style="list-style-type: none"> • Large Group Discussion: Compare Procedures for 	State/district/school recall procedures

	<p>Food Recall</p> <ul style="list-style-type: none"> ○ Responding to a Food Recall ○ Handling a Food Recall ● Sample Standard Operating Procedures for a School District and a School Site 	<p>Mountain Springs School District Case Study to Recommended Procedures Handouts</p>	
5 minutes	<ul style="list-style-type: none"> ● Revisit Lesson Objectives ● Lesson Summary 	<ul style="list-style-type: none"> ● Review Answers to the Notes and Activity Sheet Using the Answer Key Provided 	<ul style="list-style-type: none"> ● Handout: Answer Key to Notes and Activity Sheet

Lesson 4 Activity Descriptions:

- Activity 1: Small Group Discussion: Notes and Activity Sheet Question
- Activity 2: Large Group Discussion: Mountain School District Case Study

Lesson 5-at-a-Glance

Time Allowed	Topic	Activity	Materials
10 minutes		<ul style="list-style-type: none"> • Review Objectives 	<ul style="list-style-type: none"> • Participant's Workbook • PowerPoint Handout • Slides • Notes and Activity Sheet
Objective 1: Describe two reasons why a complaint might be reported regarding USDA Foods provided for the School Nutrition Program.			
5 minutes	<ul style="list-style-type: none"> • Reasons for Complaints <ul style="list-style-type: none"> ○ Food Safety Issue ○ Food Quality Issue • Whom to Tell About Complaint 		<ul style="list-style-type: none"> • Slides • Handout: Fact Sheet on How to Report a Complaint about a USDA Food
Objective 2: List information that should be provided if a complaint is filed about a USDA Foods used by the School Nutrition Program.			
5 minutes	<ul style="list-style-type: none"> • Information to Include with a Complaint about USDA Foods • Photographs • Sample Form 		<ul style="list-style-type: none"> • Slides
Objective 3: Explain how food should be retained while a food complaint is filed and Processed.			
5 minutes	<ul style="list-style-type: none"> • Items to be Retained 		<ul style="list-style-type: none"> • Slides
5 minutes	<ul style="list-style-type: none"> • Revisit Lesson Objectives • Lesson Summary 	<ul style="list-style-type: none"> • Review the Answers to the Notes and Activity Sheet Using the Answer Key Provided 	<ul style="list-style-type: none"> • Handout: Answer Key to Notes and Activity Sheet

Lesson 5 Activity Descriptions:

- Activity 1: Questions on Notes Activity Sheet

Lesson 6-at-a-Glance

Time Allowed	Topic	Activity	Materials
5 minutes		<ul style="list-style-type: none"> • Review Objectives • Activity: Relate Quotes to Topic 	<ul style="list-style-type: none"> • Participant's Workbook • PowerPoint Handout • Slides • Index Cards with Motivational Quotes • Notes and Activity Sheet
Objective 1: Explain why an inventory management system is important when handling a recall of USDA Foods.			
5 minutes	<ul style="list-style-type: none"> • Accurate, Timely Response • Records Needed • Examples of Poor Practices • Suggested Practices 		
Objective 2: Recognize the impact of the single inventory management system on a recall of USDA Foods.			
3 minutes	<ul style="list-style-type: none"> • Single Inventory System • Definition • Impact • Examples • Information Needed 	<ul style="list-style-type: none"> • Class Discussion 	<ul style="list-style-type: none"> • Slides
Objective 3: Describe how food product tracking can be incorporated into an inventory management system.			
5 minutes	<ul style="list-style-type: none"> • Critical Tracking Events • Responsibilities of Operators of State-owned or Contracted Facilities 		<ul style="list-style-type: none"> • Slides

Objective 4: List four types of records that must be kept regarding USDA Foods.			
5 minutes	<ul style="list-style-type: none"> Who Needs to Keep Records Types of Records to Keep 		<ul style="list-style-type: none"> Slides
Objective 5: Recall how long USDA requires that records for recalls of USDA Foods be retained.			
2 minutes	<ul style="list-style-type: none"> Retention Period Unresolved Claims 		<ul style="list-style-type: none"> Slides
5 minutes	<ul style="list-style-type: none"> Revisit Lesson Objectives Lesson Summary 	<ul style="list-style-type: none"> Check the Answers to Notes and Activity Sheet Using the Answer Key Provided 	<ul style="list-style-type: none"> Handout: Answer Key to Notes and Activity Sheet

Lesson 6 Activity Descriptions:

- Activity 1: Motivational Quotes Activity

Lesson 7-at-a-Glance

Time Allowed	Topic	Activity	Materials
5 minutes		<ul style="list-style-type: none"> • Review Objectives • Activity: Relate Household Items to Topic of Lesson 	<ul style="list-style-type: none"> • Participant's Workbook • Slides • PowerPoint Handout • Notes and Activity Sheet
Objective 1: Differentiate between the destruction and disposal of USDA Foods.			
5 minutes	<ul style="list-style-type: none"> • Definitions • Source of Instructions • Examples • Management of Solid Waste 	<ul style="list-style-type: none"> • Class Discussion 	<ul style="list-style-type: none"> • Slides
Objective 2: Explain why and how destruction of USDA Foods can be verified.			
5 minutes	<ul style="list-style-type: none"> • Rationale for Verification • Sample Form 		<ul style="list-style-type: none"> • Slides • Observation Form Handout
Objective 3: Examine a given case study to determine if the USDA Foods have been destroyed in accordance with procedures.			
5 minutes		<ul style="list-style-type: none"> • Case Study 	<ul style="list-style-type: none"> • Destruction and Disposal of Recalled USDA Foods Handout
10 minutes	<ul style="list-style-type: none"> • Revisit Lesson Objectives • Lesson Summary 	<ul style="list-style-type: none"> • Activity: Teach a Partner About Destruction and Disposal of USDA Foods • Review the Answers to the Notes and Activity Sheet Using the Answer Key Provided 	<ul style="list-style-type: none"> • Handout: Answer Key to Notes and Activity Sheet

Lesson 7 Activity Descriptions:

- Activity 1: Household Items Activity
- Activity 2: Destruction and Disposal of Recalled USDA Foods Case Study
- Activity 3: Teach a Partner Activity About Destruction of and Disposal of USDA Foods. (*Optional, if time permits.*)

Lesson 8-at-a-Glance

Time Allowed	Topic	Activity	Materials
5 minutes		<ul style="list-style-type: none"> Review Objectives 	<ul style="list-style-type: none"> Participant's Workbook Slides PowerPoint Handout Notes and Activity Sheet
Objective 1: List four types of costs associated with USDA Foods that are reimbursable.			
5 minutes	<ul style="list-style-type: none"> Federal Authority Types of Reimbursable Costs Need for Working with USDA 		<ul style="list-style-type: none"> Slides
Objective 2: Given a specific situation, identify which agency is most likely to be responsible for replacing affected products and reimbursing local agencies for foods in a recall of USDA Foods.			
5 minutes	<ul style="list-style-type: none"> Vendor/processor Will Replace Affected Product and Reimburse Costs 		
Objective 3: Explain the procedures that the Federal and State agencies will use to obtain reimbursement for the costs incurred due to a recall of USDA Foods.			
5 minutes	<ul style="list-style-type: none"> Replacement and Reimbursement of Processing Costs Instructions for: <ul style="list-style-type: none"> USDA Foods Delivered as Purchased Processed USDA Foods Delivered to SDA/RA General Reimbursement Procedures: 		<ul style="list-style-type: none"> Slides Handout: Fact Sheet on Reimbursement for Recalled USDA Foods

	<ul style="list-style-type: none"> ○ RA's Request for Reimbursement ○ Reimbursable Expenses ○ Non-reimbursable Expenses ○ SDA's Request for State ○ FNS Regional Office Role ○ Office of Food Safety at FNS Headquarters Role ○ AMS Procurement Office Role ○ Farm Service Agency Role ○ Food Distribution Division at FNS Headquarters Role 		
10 minutes	<ul style="list-style-type: none"> ● Revisit Lesson Objectives ● Lesson Summary 	<ul style="list-style-type: none"> ● Closing Activity: Toolbox Activity to Capture "Take Always" ● Review Answers to Notes and Activity Sheet Using the Answer Key Provided ● Complete the Post-assessment. Review the Answers Using the Answer Key ● Course Evaluation 	<ul style="list-style-type: none"> ● Toolbox Activity Sheet ● Handout: Answer Key to Notes and Activity Sheet ● Post-Assessment ● Handout: Answer Key to Post Assessment ● Course Evaluation

Lesson 8 Activity Descriptions:

- Activity 1: Toolbox Activity

Preparation Checklist

Instructions: The following tasks are necessary for presenting this lesson. Assign each task to a specific person and determine the date that each task must be completed. Keep track of the progress by recording information on the tracking form and checking off tasks as they are completed.

Task	Person Responsible	Completion Date	√
Reserve equipment and gather supplies as needed for use on the day of class (6 weeks prior). Instructor's Manual Roster of participants attending for instructor Participants' sign-in sheets List of equipment and supplies needed Microphone (preferably wireless) Computer to present slides LCD Projector and screen Internet access (if available) Laser pointer Reference Documents (for Instructor's use only) Flip chart paper (self-adhesive strip sheets) Painters' tape (do not use masking tape) Markers (including a minimum of 5 colors that are permanent) Pen, pencils, note paper, highlighters, self-adhesive notes, page markers, index cards (each table) Card stock paper for table tents Timer Assortment of small prizes (optional) Misc. materials for dividing class into groups (see p. xxiii-xxv)	Instructor		
Participant's Workbook Agenda Roster of presenters/participants Handouts			
Evaluation (lessons and/or overall for each participant)			

Recommended Ways to Divide the Class into Small Groups

Directions: In order to engage the participants in the course, use a variety of these techniques during the course.

Nuts and Bolts

Decide how many groups you want to have in the class. Choose different sizes or types of nuts and bolts for each group. Ask participants to match up hardware to form a group.

Know Your Sign

Group participants by personality traits. Place the number of posters around the room to equal the number of groups that you would like to form in the class. Ask participants to go to the poster that most reflects their personality. Also tell them you would like an equal number of people in each group, so that if they get to a group late, they might move on to another trait that they also possess. Some suggested traits for you to consider include:

Cautious

Adventuresome

Practical

Dramatic

Independent

Team player

Number Off

Decide how many groups you want in the class. Ask participants to number off. For example, if you want six groups, they will count off 1-6, and then begin again. Group participants by their number.

Favorite Animal/Color

Decide how many groups you want in the class. For example, if you want six groups, identify six animals or six colors and write their names on an equal number of index cards. Each member of the class should receive an index card. If there are 30

participants in the class, you would have five cards with the same animal's name or the same color. Group participants by the animal's name or the color. Suggestions include:

<u>Animals</u>	<u>Colors</u>
Monkeys	Orange
Zebras	Black
Elephants	Red
Dogs	Blue
Cats	Brown
Snakes	Purple

Body Parts

Give participants a picture of a body part (arms, legs, head, torso, etc.) If you can't draw them, cut up magazine pictures to create body parts. Instruct participants to find the rest of their "body" so that they can be whole and complete the group activities. You could also group all of the arms together in one group, all of the legs in another group, etc. The number of body parts that are needed will be dependent upon the number of groups that you wish to form.

Stickers

Place stickers on index cards. Determine how many groups and how many people that you want in each group. For example, if you want six groups of five people, then you would need six different types of stickers (stars, balloons, apples, etc.) and five cards of each type.

Comics

Use panels of comics to divide participants into groups. Select comic strips based upon number of participants you want in each group. For example, if you wanted five people in each group, you would need five panels from Nancy, Beetle Bailey, or the Dagwood comics. If you wanted six groups, you would need six different types of comics.

Birthday Month/Zodiac Sign

Group participants by birthday month or zodiac sign. Be prepared to tell trainees what sign they are if they don't know. After they have formed groups, be prepared to move people from one group to another to make the size of the groups more equal.

Current Events

Make a list of principal players of a current event or TV show and ask them to sign up to be a specific person. Later you can reveal how the people will be grouped together. The number of events or shows would equal the number of groups that need to be formed and the names of the players would equal the number that you wanted in each group. For example, you might have Good Morning America as one of the events. People would sign up to be Robin Roberts, Lara Spencer, Josh, Sam or George, if you wanted five people in the group. The next group might be Congress and you would include five Senators or Representatives. You could have Past Presidents or Past First Ladies, as additional groups. Another group might be Country Music Artists or Winners of American Idol. Choose the events based on the interests of your participants.

Positive Descriptors

Use a small post-it pad to write positive descriptors, such as “happy,” “empathic,” or “enthusiastic.” Decide how many groups and how many people you would like in each group. If you would like six groups, choose to use six different words. If you want five people in each group, write the word five times randomly throughout the pad. Pass the pad around and instruct each participant to take one of the slips of paper. Group participants with the same descriptors together.

Recommended Ways to Choose Recorder or Reporter for Groups

Directions: Use a variety of these techniques throughout the course. They will help participants engage in the class and get better acquainted.

The person with the greatest/least number of years of experience in school nutrition.

The person with the most/least number of children or grandchildren.

The person with the longest/shortest hair.

The person with the newest/oldest pair of shoes.

The person with the most/least number of keys in their pocket or purse.

The person who most recently ate a slice of pizza.

The person who came the greatest distance to attend the class or who lives the closest to the class site.

The person who likes green bananas.

The person who drinks eight glasses of water daily.

The person who has most recently completed volunteer work for the community or the church.

The person who most recently enjoyed a vacation away from home.

The person who watches the most shows on the Food Channel.

Add up the digits of their social security number. The recorder/reporter is the one with the lowest or highest total number.

Lesson 1: Introduction to the Basics of the Food Recall Process for USDA Foods

DO:

(In advance) Post flip chart sheets for the activity under Objective 3 around room.

SAY:

Welcome to *Responding to a Food Recall of USDA Foods*, a course designed to highlight procedures to be used during a recall of USDA Foods. The course is based on a USDA/NFSMI document, *Responding to a Food Recall: Procedures for Recalls of USDA Foods*. The entire document can be downloaded from the National Food Service Management Institute's website, www.nfsmi.org/foodrecall. These procedures may not apply to commercially purchased food.

Responding to a Food Recall of USDA Foods is targeted to school nutrition managers, directors, and State agency staff. This four-hour course consists of eight lessons, each 30 minutes in length. Each participant should have a Participant's Workbook. Locate the PowerPoint handout. This handout contains a copy of each slide used throughout the eight lessons of the course. Use it to make additional notes about the slides, if necessary. Our first lesson will introduce the basics of the food recall process for USDA Foods.

Before we begin the first lesson, we need to review some ground rules which will pertain to how we will conduct the course. I have listed some rules on this slide.

SHOW SLIDE: Ground Rules

SHOW SLIDE: Responding to a Recall of USDA Foods

SAY:

Let's see what you know about food recalls. Take the next five minutes to answer the questions on the pre-assessment. We will discuss the answers to the questions after we complete the course.

SHOW SLIDE: Sample Customized License Plate

DO:

Divide the class into small groups of five to six participants. Give each participant a piece of cardstock to be used as a table tent. Ask participants to fold the sheets of card stock so they can write their names on the front of the table tent and place it on their work area. You may need to demonstrate how to fold the paper to make a table tent. On the back of the table tent, the participants will design a customized license plate for themselves. Project the slide with a sample license plate.

Remind them of the limited space available on the tag. Participants should use a maximum of eight letters or numbers to design a personal tag. Allow three minutes to complete the assignment. Ask them to introduce themselves to each other and share the information they placed on their customized license plate.

DO:

Remind participants to locate the **Notes and Activity Sheet** for Lesson 1 to record important concepts as we go through the lesson. We will review the answers at the end of this lesson.

SAY:

Throughout the course we will be using terminology associated with USDA Foods and food recalls.

DO:

Refer participants to the **Glossary** and the **Acronyms List** in the back of the Participant's Workbook.

SAY:

As you can see, the glossary contains a comprehensive list of terms and definitions and may be a useful resource for future reference. We will not cover all of these terms in Lesson 1, but you should refer to the **Glossary** if you are unsure of the meaning of a term being used in the discussion. The **Acronyms List** will be a useful reference in case you locate an acronym and are not sure of what the acronym stands for.

SHOW SLIDE: Lesson 1 Objectives

DO:

Read objectives for Lesson 1.

SAY:

Objective 1: Differentiate between USDA Foods and foods commercially purchased for use in the School Nutrition Program.

SAY:

In order to respond to a recall of USDA Foods, you must know which foods in your school, school system, or State are USDA Foods.

SHOW SLIDE: Answer These Questions

DO:

Ask the group to answer the questions projected on the slide within the next two minutes:

1. What USDA Foods are currently available in your school or school district?
2. How can you tell the difference between the USDA Foods and purchased foods?

Ask each group to post the flip chart sheet with their answers.

Refer to the answers on their flip charts and incorporate their answers into the following information about USDA Foods. If the school site is using a single inventory process, there may be no way to distinguish between the two types of products unless the cases are coded upon delivery or dated so that the dates can be traced back to the receipt of delivery.

SAY:

Through Food Distribution Programs, USDA purchases foods using appropriations from Congress under the surplus removal program and price support activities. The foods are distributed to State agencies for use by eligible outlets, including schools. Products available through the USDA Foods program are items such as meats, vegetables, fruits, grains, and dairy products. Some States and school systems have contracted with commercial food processors to convert bulk or raw USDA Foods into more convenient, ready-to-use products. USDA Foods may be packaged exactly like the commercial products that you purchase.

SHOW SLIDE: USDA Foods and Purchased Commercial Products May Look Identical

SAY:

USDA Foods represent about 20% of the foods used in school meals. The other 80% of foods are purchased by the school or school system.

Sometimes USDA Foods are stored and inventoried separately. If so, it is easy to differentiate between the two types of food. Many schools are using a single inventory system to track food items that are received and used in the preparation of school meals. If the USDA Foods are not stored and inventoried separately or coded in some fashion, you may need to refer to the delivery sheets to determine which distributor shipped them to you. If a single inventory system is in place, there will be no way to determine whether the item is commercial or USDA by looking at the cases in stock or the inventory sheet. Both purchased and USDA Foods are among the safest foods in the world. Sometimes, though, it might be necessary to recall, or remove from commerce, a food that is unsafe or mislabeled. Throughout this course, we will focus on procedures to follow during recalls of USDA Foods.

SAY:

Objective 2: Define a food recall.

DO:

Refer participants to glossary.

SAY:

A food recall is an action by a manufacturer or distributor to remove a food product from the market because it may cause health problems or death. When there is a reason to believe food is unsafe or mislabeled, the food is recalled or removed from the market. A food recall is typically voluntarily initiated by the food manufacturer. 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 of Health and Human

Services (DHHS) oversee the commercial recall process. These two regulatory agencies make recommendations and are both authorized to take administrative actions to require a recall, if necessary. They also conduct effectiveness checks throughout the recall process, or audit checks, to verify that the company was diligent in notifying its customers of the need to retrieve and control the recalled product.

ASK:

How many have experienced a recall of USDA Foods in your school? (*Discuss their experiences with the class.*)

How did you know that the recall involved USDA Foods and not just commercial products? (*During a recall of USDA Foods, the notification would come from FNS to the SDA, and from the SDA to the RA.*)

SAY:

Objective 3: List three reasons why a food recall may be initiated.

SHOW SLIDE: Reasons Why a Food May Be Recalled

SAY:

Foods may be recalled because they are unsafe, adulterated, or mislabeled. Adulterated food may be impure, unsafe, or unwholesome. It may contain a pathogen (e.g., *Salmonella*), a foreign material (e.g. plastic), or an undeclared allergen. There might have been a packaging failure.

SAY:

Objective 4: Name the three agencies responsible for purchasing USDA Foods for the School Nutrition Program.

SHOW SLIDE: Agencies Responsible for Purchasing USDA Foods

SAY:

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

AMS purchases:

- fruits and vegetables,
- beans,
- poultry,
- egg products,
- beef and pork,
- fish, and
- fruit and nut mix.

FSA purchases:

- cheese,
- rice and pasta,
- cereal and crackers,
- peanut butter,
- peanut products,
- flour, and
- vegetable oil.

SAY:

Both AMS and FSA develop product specifications or use existing commercial specifications and enter into contracts with manufacturers to purchase food for school meals. The AMS and FSA monitor contract terms to determine if product specifications have been met. If either of these agencies detects food safety problems, they are in

direct contact with the Federal regulatory agencies (FSIS and FDA) as well as the Food and Nutrition Service (FNS) of USDA that administers the National School Lunch Program (NSLP) nationwide.

The DOD purchases fresh fruits and vegetables for distribution in the USDA School Meals Programs. If food safety becomes an issue, DOD can trace the products from the producer to the customer.

DO:

Allow a minute for each participant to complete **Question 5** on the **Notes and Activity Sheet**. Review the correct answers.

Review answers to the **Notes and Activity Sheet** for this lesson to be sure everyone has recorded the correct answers.

Summary

SAY:

USDA Foods are purchased on the commercial market by AMS, FSA, and DOD. Even though both purchased and USDA Foods are among the safest foods in the world, sometimes it is still necessary to recall a food that is unsafe, adulterated or mislabeled. Food recalls are almost always initiated voluntarily by the food manufacturer. FSIS and FDA oversee the recall process.

Lesson 2: In-Depth: Food Recalls of USDA Foods

SAY:

Lesson 2 of the *Responding to a Food Recall* course examines food recalls in greater depth. Locate the PowerPoint handout. Also locate the **Notes and Activity Sheet** for Lesson 2. You will use this handout to record the major concepts presented as part of today's lesson.

SHOW SLIDE: Lesson 2 Objectives

DO: Read Objectives for Lesson 2.

SAY:

Objective 1: Describe how it might be determined that a recall of USDA Foods is necessary.

SAY:

Foods may be recalled as a result of hazards detected by:

- manufacturers' tests or observations;
- test results from product sampling by the regulatory agency;
- field inspections, or investigations, by regulatory agencies; and/or
- epidemiologic data on the occurrence of disease in the population is 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 evidence that a food recall is necessary, the evidence is presented to the manufacturer and the manufacturer is asked to recall the product. Once the recall is announced, usually through a press release, the manufacturer is required to notify all of its affected consignees. Consignees are the customers (companies or organizations) that have received a portion of the affected product. In an administrative food recall, USDA may decide to remove products from distribution when it decides safety is a concern, even though the food products technically meet the purchase specification requirements and are free to move in commercial distribution channels. Under these circumstances, FNS notifies the SDAs of the administrative recall, and USDA coordinates the 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 USDA, FNS will notify the affected SDAs. The vendor, working with AMS or FDA, is responsible for retrieving and promptly replacing the identified USDA Foods, and reimbursing SDAs/RAs for transportation and storage expenses.

DO:

Working with a partner, answer **Question 1** on the **Notes and Activity Sheet**. Determine which of these methods might have been used in each of the scenarios. Allow three minutes to complete the assignment and review answers.

SAY:

Objective 2: Interpret the differences between the three classes of food recalls.

SAY:

Food recalls are classified according to the level of risk that would be posed to the health of those who might consume the food.

DO:

Locate the handout on **Food Recall Classes** in the Participant's Workbook. Review the definition of each class and the examples given. Answer **Question 2** on the **Notes and Activity Sheet**. Allow three minutes to complete the assignment and then ask for volunteers to share their answers.

SAY:

Objective 3: Explain how schools are notified when there is a recall of USDA Foods.

ASK:

How are you notified if there is a recall of USDA Foods?

Has your State Distributing Agency (SDA) told you how you would be notified if there were to be a recall of USDA Foods?

DO:

Allow several participants to share their experiences. As participants share their experience, you may need to clarify the difference between a recall of USDA Foods vs. a commercial product. It is not uncommon for schools to learn about a recall from their supplier/distributor first, since recalls of USDA Foods are almost always part of a larger commercial recall.

Emphasize that they need to discuss the procedures that would be used during a recall of USDA Foods with their SDA. Transition into the use of the Rapid Alert System (RAS) used in the Web-Based Supply Chain Management (WBSCM) system and the USDA State Emergency Notification System (SENS).

SAY:

Each State must identify at least one food safety contact (State Food Safety Coordinator) and an alternate who will be contacted in the event of a recall.

ASK:

Who is your State Food Safety Coordinator?

DO:

Provide the name of the Food Safety Coordinator for the participants involved in the course, if possible. If you do not know, you can begin to find out by locating the State contacts on the FNS Food Distribution Division at www.fns.usda.gov/fdd/contacts/sdacontacts.htm. If this person is not the Food Safety Coordinator, they should be able to tell you who it is for their State.

SAY:

When USDA Foods are involved in a food recall, FNS develops a message for the State Distributing Agency (SDA) that is delivered through the RAS of the WBSCM. The Web-Based Supply Chain Management System is the computerized system that is used to order and manage USDA commodity foods. The Rapid Alert System is a part of that computer program. The message includes specific product information to help the SDA track the food. General instructions on how the affected product should be handled may also be included.

The State's Food Safety Contact receives the notification message that is sent through the RAS of the WBSCM system. They are notified by telephone, or email until the list of contact options is expended. They may modify the FNS message so that it meets the situation in the State, and it is then sent to the recipient agencies.

The State agency can also use this system to report information back to USDA about how much of the affected product they received, how much has already been served, and how much of the product remains in inventory.

Once States are notified by FNS about a recall, they must in turn notify the RAs in their State. FNS established the USDA State Emergency Notification System (SENS) for State Distributing Agencies to use when communicating information with the recipient agencies about food recalls that affect USDA Foods. This system allows the State Distributing Agencies to rapidly contact recipient agencies by phone, email, text message or Blackberry PIN. This system can **only** be used by State Distributing Agencies to notify recipient agencies about USDA Foods. The features in the SENS system can be customized for each State. The State agency's participation in this system is voluntary, and the SDAs can plan to use another communication tool for contacting RAs, if they choose to do so. Regardless of what method is used to contact RAs, it is important to have a reliable communication plan set up in advance of a recall of USDA Foods.

SAY:

Refer to the **Methods of Communication Recalls of USDA Foods** handout in the Course Workbook to follow along with these additional methods of communication that FNS may use. FNS may also use other methods of communicating information about a recall of USDA Foods. These methods include:

- emailing messages to:
 - FNS Regional Office food safety contacts and asking them to send the information to their State Distributing Agency contacts.
 - 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/.

- 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>.
- posting announcements on:
 - the recalls forum of the WBSCM homepage.
 - the FNS Food Safety website at <http://www.fns.usda.gov/food-safety/>. This website also features the FoodSafety.gov widget, which displays the latest recall and alert notification from FSIS and FDA.
- Using social media avenues, such as Twitter and USDA blogs.
- providing information to:
 - partner organizations, such as the School Nutrition Association, and the American Commodity Distribution Association, with information to share with their members.
 - the Department of Education and request that recall information be posted to their website or Crisis Communication System if the crisis is of significant public health proportions.

DO:

Refer to the sample press release from FDA found in the Course Workbook. Point out to participants what information is provided to help track the product.

DO:

Working in small groups, do **Question 3 and** create a flow chart or illustration of how the communication flows from the Federal agency to the school during a food recall.

Debrief their response by showing the flow chart provided on the slide.

SHOW SLIDE: Food Recall Flow Chart

SAY:

USDA also provides information on the recall of commercial foods that are not USDA Foods but that may have been purchased locally by schools. In this situation, FNS may send an email to their Regional Office Food Safety Contacts with information to send to the State Distributing Agencies. They may also post announcements on the recalls forum of the WBSCM homepage and on the FNS Food Safety website at <http://www.fns.usda.gov/food-safety/>. They may also send an email to GovDelivery subscribers and use social media to communicate the food recall message.

SHOW SLIDE: Metaphor Activity

DO:

Review answers on the **Notes and Activity Sheet** for the lesson to be sure everyone has recorded the correct answers.

SUMMARY

SAY:

The significance of a recall of USDA Foods can be determined by understanding the definitions of each class of recall. Class I recalls have the greatest public health significance. The food may be recalled based on hazards detected through manufacturers' tests or observations, test results from product samplings, field inspections, epidemiologic data, or an administrative recall. USDA uses the Rapid Alert System (RAS) of the WBSCM system to contact state food safety contacts. Secondly, they established the USDA State Emergency Notification System (SENS). Once they notify the SDA, the SDA modifies the message so that it is appropriate for the RAs in the state.

Lesson 3: Roles and Responsibilities of Agencies during a Recall of USDA Foods

SAY:

We are ready to begin Lesson 3 of the *Responding to a Food Recall* course.

In your Participant's Workbook, locate the PowerPoint handout and **Notes and Activity Sheet** for this lesson.

SHOW SLIDE: Lesson 3 Objectives

DO:

Read objectives for Lesson 3.

SAY:

Objective 1: Name two Federal agencies responsible for ensuring the safety of food and regulating the food supply.

SAY:

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

DO:

Remind participants to complete the **Notes and Activity Sheet** as you progress throughout the lesson. Refer participants to handout in Course Workbook titled **Lesson 3: Functions of Federal and State Agencies**. They may wish to refer to it, as you review the functions of the different agencies.

SAY:

Objective 2: Explain how the two Federal agencies verify that the food recall was implemented effectively.

SAY:

The FSIS and FDA oversee the recall process to assist the manufacturer in ensuring that appropriate actions are taken to protect the public. They both can conduct effectiveness checks, or audit checks, to verify that the company handling the recall was diligent in notifying its customers of the need to retrieve and control the recalled product and that all of the consignees responded accordingly. Schools and SDAs may be contacted during these effectiveness checks to verify that they received the recall information.

Both FSIS and FDA are authorized to take administrative action that can require a recall, if necessary. It would be rare for these agencies to exert this authority, but it can be done if necessary, for example, if a company refuses to recall a food that may be a health hazard.

SAY:

Objective 3: Differentiate between the responsibilities of the Federal agency, the State agency, and the recipient agency, the processor and the distributor during a recall of USDA Foods.

SAY:

Recalls of USDA Foods are almost always 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 (*also see **General Steps in Recall of USDA Foods** Fact Sheet *the in Participant's Workbook**).

SAY:

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.

ASK:

If USDA peanut butter is affected by the recall, which purchasing agency would FNS confer with?

SAY:

We learned in a prior lesson that FSA was the agency responsible for purchasing peanut butter.

ASK:

What if it were a fish product? Which purchasing agency would FNS confer with?

SAY:

AMS is the correct choice.

SHOW SLIDE: USDA Food Recall Flow Chart

SAY:

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.

SHOW SLIDE: Product Identification

SAY:

Specific product identification information must be provided by the manufacturer so that the 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);and
- product markings (e.g., can codes,lot numbers, andproduct 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.

All of this information can be found on the Fact Sheet on **How to Identify Products Involved in a Recall of USDA Foods**. It is located in the back of your Participant's Workbook.

SAY:

The USDA FNS National Office contacts all National Processing Agreement (NPA) 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 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 lesson.

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.

RAs must notify all entities, such as food banks, 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.

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, and
- redirected for further processing.

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

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.

These steps are outlined in a Fact Sheet on **General Steps in a Recall of USDA Foods**. It can be found at the back of your Participant's Workbook.

DO:

Answer **Question 15** on the **Notes and Activity Sheet**.

DO:

Refer participants to handout titled **Roles and Responsibilities** in the Participant's Workbook. Ask the members of the class to divide into groups of five to six participants and select a recorder/reporter. Ask participants to answer the questions on the **Whose Responsibility? Activity** in the next five minutes. Ask for the reporters to share the answers with the entire class. Project four slides with the answers to the activity.

SHOW SLIDES: Whose Responsibility? Answer Key (4 slides)

DO:

Review answers on the **Notes and Activity Sheet** for the lesson to be sure everyone has recorded the correct answers

SUMMARY

SAY:

Recalls of USDA Foods are almost always a part of a bigger recall of commercial food products since USDA Foods are produced by the same manufacturers that sell on the commercial market.

The communication of a food recall can be complex due to the number of Federal agencies working together to regulate, procure and distribute USDA Foods. Even though the exact flow of information varies as the recall evolves, there are general steps that FNS follows during the recall process.

Lesson 4: Standard Operating Procedures during a Recall of USDA Foods

DO:

(In Advance) Ask participants to bring a copy of their State/district/school standard operating procedures related to food recalls.

SAY:

We are ready to begin Lesson 4 of the *Responding to a Food Recall* course.

SAY:

In your Participant's Workbook, locate the PowerPoint handout and the **Notes and Activity Sheet** for this lesson.

SHOW SLIDE: Lesson 4 Objectives

DO:

Read objectives for Lesson 4.

SAY:

Objective 1: Locate the website to sign up to receive food safety recalls.

SAY:

FNS encourages all State Distributing Agencies (SDAs) and recipient agencies (RAs) to sign-up for food safety recall alerts from FSIS and FDA through www.FoodSafety.gov/recalls.

DO:

Be sure that all participants have entered the web address on their **Notes and Activity Sheet**. Enter the web address into an Internet browser and show participants how to navigate the site. Refer to handout of **FoodSafety.gov/recall** screen shot, so that participants can follow the discussion. If an Internet connection is not available at the training site, use the handout provided as an alternate approach. Point out the tabs across the top of the page:

- Home,
- Recalls and Alerts,
- Keep Food Safe,
- Food Poisoning,
- News & Features,
- Report a Problem,
- Ask the Experts,
- Blog, and
- Multimedia.

Also point out where to click on the left side of the screen to sign up for automatic alerts.

DO:

Encourage participants to sign up to receive these alerts as soon as they return to their job site.

SAY:

Objective 2: Describe how the communication process is affected when USDA Foods have been diverted for processing or when foods have been shipped to a processor with a national processing agreement.

SAY:

Many USDA Foods are processed into finished products that are served in the School Nutrition Program.

ASK:

Who makes the decision to have the foods processed?

DO:

After calling on volunteers to share their opinions, transition to the following statement.

SAY:

The decision to use USDA Foods in this manner can be made at the Federal, State or school district level. We will discuss how this decision can affect food recalls in each of these different scenarios. Communication between each entity involved must ideally occur within 24 hours or less.

SAY:

Processors may substitute USDA Foods with quantities of domestically produced, commercially purchased product that are of equal quality. In other words, USDA may purchase peanut butter for processing into peanut butter and jelly sandwiches. The processor can use other commercial cases of peanut butter to produce the sandwiches and use the USDA peanut butter for another purpose, such as making peanut butter

cookies. The product that is substituted must be comparable and of equal quality or better as the USDA product they received. Processors are responsible for tracking this substitution as the information would be needed during a food recall.

The processors are responsible for maintaining records of all consignees in order to trace the distribution of their products. They are also responsible for notifying their consignees about the recall and must do so quickly.

DO:

Be sure that participants have answered **Questions 2-5** on their **Notes and Activity Sheet** before beginning the next portion of the lesson.

SHOW SLIDE: Communication Steps for Products Processed Under National Processing Agreements

DO:

Use slide to help clarify and summarize the following points.

SAY:

Under a National Processing Agreement (NPA), FNS holds an agreement with the processor and approves all end products that will be manufactured. Examples of USDA Foods processed through an NPA Agreement includes items such as pork BBQ, chili and taco meat, tamales and burritos, pizza, fruit pastries, sliced apples, and salsa. Although the communication process will vary depending upon how the food recall evolves, these are the 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.
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. Under these circumstances, you would most likely be contacted by your distributor. This is a good reason to sign up to receive the FSIS and FDA alerts.
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 confirms 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.

DO:

Confirm that all participants have answered **Questions 6-10** on their **Notes and Activity Sheet** before proceeding to the next section of the lesson.

SHOW SLIDE: Communication Steps for Products Processed By In-State Processing Agreements

DO:

Use slide to help clarify and summarize the following points.

SAY:

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 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. The in-State processor would also report end products that weren't affected to the SDA.

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.

SHOW SLIDE: Communication Steps for Products Redirected by Recipient Agencies

DO:

Use slide to help clarify and summarize the following points.

SAY:

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.

DO:

Be sure that participants have answered **Question 11** on their **Notes and Activity Sheet**.

DO:

Food Recall Game

Directions:

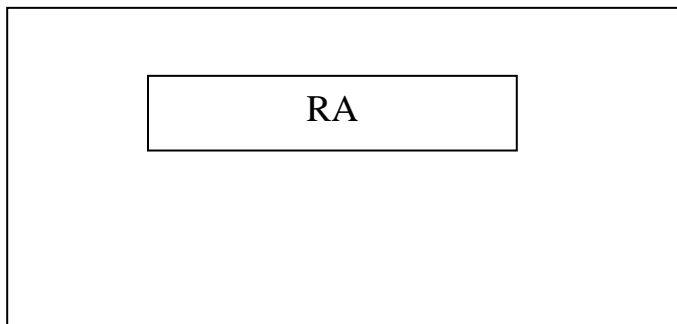
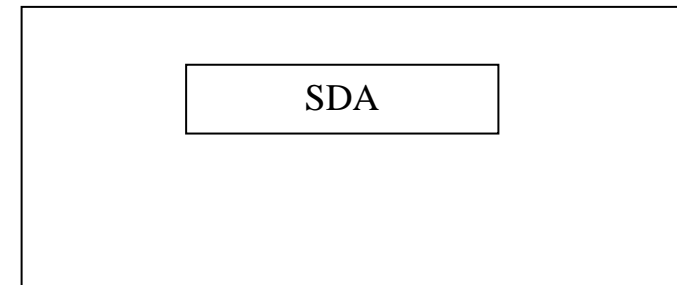
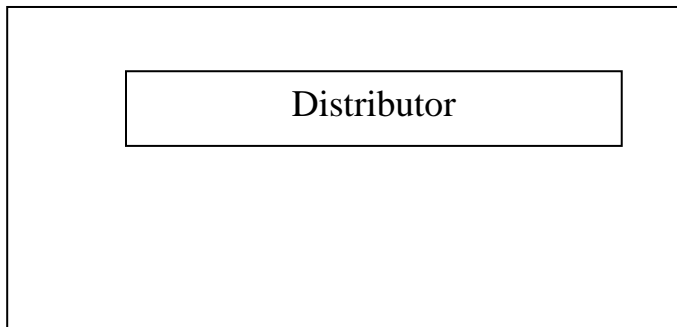
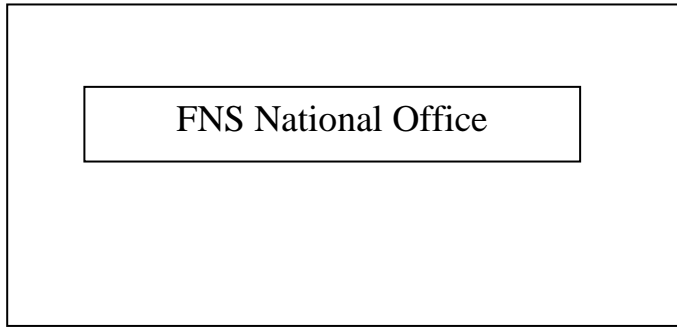
Cut out the two jars of peanut butter and the tables or stations pictured below. Use these pictures as manipulates to illustrate the different flow of communication for a recall of USDA Foods versus a commercial recall, under different circumstances. Write each of the five types of recall situations found in the answer key on index cards.

Distribute a set of the pictures to each small group and one of the index cards with a recall situation. Encourage them to arrange the stations in the correct order and describe what each station would do, based on the situation that their group is assigned. Use the answer key as a guide when each group reports to the class.



NPA Processor

In-State Processor



Answer Key for the Following Situations:

1. Cans of Bulk USDA Peanut Butter Delivered to SDAs and RAs

- FNS National Office notifies SDA through RAS of WBSCM as soon as possible but within 24 hours of the recall notification. The recall notification includes the recall notice, the press release and product identification information.
- SDAs notify RAs through SENS or some other communication system.
- RAs must isolate product and submit inventory data to SDA within 48 hours of recall notification.

2. USDA Peanut Butter Used by NPA Processor with No Substitutions

- FNS National Office notifies NPA Processor and SDAs.
- NPA Processor notifies all customers (SDAs, RAs, Distributors) who received end product.
- NPA Processor notifies SDA customers that did not receive the product.

3. USDA Peanut Butter Used by In-State Processor with Substitution Made

- SDA must notify processor.
- Processor must maintain records of substitution.
- When substitution is made, recall becomes a commercial recall.
- Processor must contact all customers who received the affected product from them.
- Distributor notify RAs about the recall and provide information to the in-State processor about the quantity remaining in their inventory and the quantity delivered to each RA.
- Processor must isolate, destroy and dispose of affected product.
- USDA seeks reimbursement for costs of implicated USDA Foods.

4. USDA Peanut Butter Redirected by RA

- RA must notify processor.
- Processor must isolate, destroy and dispose of affected product.

5. Recall of Commercial Peanut Butter

- Distributor/processor contacts customers, including RAs.
- Distributor must provide information to SDA regarding the quantity remaining in inventory and the quantity delivered to each RA.
- FNS National Office may email FNS regional offices, the public Commodity Alert System and GovDelivery subscribers. They may post information on the recalls

forum of the WBSCM homepage and at the FNSA Food Safety website at www.fns.usda.gov/food-safety/

SAY:

Objective3: Evaluate standard operating procedures of a school district to determine acceptability for responding to a food recall.

SAY:

Since this communication process is so complex, it is important to have a standard operating procedure (SOP) in place in a local school district so that you are ready to handle a food recall when you are notified. See the **Sample Operating Procedures for School Districts** from *Responding to a Food Recall: Procedures for Recalls of USDA Foods* found in your Participant's Workbook. There is one on preparing for a food recall, one on responding to a food recall, and one on handling a food recall. These could serve as prototypes for you to use when you begin to develop procedures for your school or school system. Your standard operating procedures should be modified to reflect whether your system is redirecting any USDA Foods for further processing. You will also want to determine what you will do during a recall of commercial foods. Even though our emphasis throughout this course has been on the recall of USDA Foods, much of the information that we covered will also apply to the recall of commercial foods. For example, in the first lesson, we learned about the types of recalls, the role of different Federal regulatory agencies and how it was determined if a recall was necessary. All of this information would apply to commercial recalls. What will change, however, are the paths of communication. Under these circumstances, FNS will not initiate or facilitate communication about the recall. Your SOP should address how the State agency or the school district will find out about commercial recalls. How will you communicate this information to others? How will you coordinate communication with your vendors to replace food, and get reimbursed for affected products? What will you do with the affected products?

DO:

As a large group, review the **Sample Standard Operating Procedures for School Districts** handout and the **Standard Operating Procedures for Mountain Springs School District**. Compare their State/district/school procedures for responding to a food recall to the sample procedures provided by USDA and NFSMI. If they did not bring food recall procedures with them, locate the **Standard Operating Procedures for Mountain Springs School District Activity** found in the Participant's Workbook. Answer the discussion questions found at the bottom of the Mountain Springs School District's procedure. Encourage the class to discuss each question until all of the questions have been thoroughly covered.

DO:

Review answers on the **Notes and Activity Sheet** for the lesson to be sure everyone has recorded the correct answers. If time permits, you may wish to allow the groups extra time to work together to complete the answer to **Question 16** on the **Notes and Activity Sheet**. Refer participants to the answer key.

SUMMARY

SAY:

By signing up to receive food safety recall alerts from FSIS and FDA at www.FoodSafety.gov/recalls, you may become aware of recalls even before you receive official notification.

We have seen how complex the communication process is regarding the recall of USDA Foods. When USDA Foods have been diverted for processing, either at the national, State, or local level, the communication chain becomes even longer. Having standard operating procedures in place at the school district and school level helps ensure that food recalls are handled effectively and efficiently in accordance with recommended procedures.

Lesson 5: Reporting Complaints about USDA Foods

SAY:

We are ready to begin Lesson 5 of the *Responding to a Food Recall* course. In your Participant's Workbook, locate the PowerPoint handout and the **Notes and Activity Sheet** for this lesson.

SHOW SLIDE: Lesson 5 Objectives

DO:

Read objectives for Lesson 5.

SAY:

Objective 1: Describe two reasons why a complaint might be reported regarding USDA Foods provided for the School Nutrition Program.

DO:

Remind participants to use the **Notes and Activity Sheet** to record the most important concepts from today's lesson. Also refer the participants to the Fact Sheet on **How to Report a Complaint about USDA Foods**.

SAY:

Sometimes a complaint will involve a food safety concern and sometimes it will involve a quality issue about USDA Foods. It is important to have a good feedback system in order to respond quickly to the concerns. All complaints about USDA Foods should be

reported to the State Distributing Agency (SDA). The SDA will report them to USDA FNS.

SAY:

Objective 2: List information that should be provided if a complaint is filed about USDA Foods used by the School Nutrition Program.

SAY:

All complaints should contain as much detail as possible. Photographs can also be submitted. The following information must be included:

- 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,
- Name and contact information of person(s) making complaint,
- 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, and
- Measurements of the foreign object.

Some SDAs have developed a complaint form to capture all of this information.

DO:

Ask participants to work together as a group to answer **Question 8** on the **Notes and Activity Sheet**. Allow no more than three minutes before reviewing the correct answer to the question.

SAY:

Objective 3: Explain how food should be retained while a food complaint is filed and processed.

SAY:

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

- original container or packaging,
- foreign object, and
- any uneaten portion of the food (confer with the State agency to determine if food should be kept refrigerated or frozen).

DO:

Review answers on the **Notes and Activity Sheet** for the lesson to be sure everyone has recorded the correct answers.

SUMMARY

SAY:

Sometimes you will receive a complaint about USDA Foods because of a safety concern; sometimes it will be about a quality issue. It is important to get as many details as possible. Report the complaint to the SDA. The SDA will need to have a description of the problem, the date your agency received the product, the quantity of the product involved, and the physical address of any product remaining. The SDA will report it to FNS USA. FNS will need to know the purchase order number, the sales order number,

including the sales order line item number, the advance shipping notification number, and any lot numbers or can codes printed on the product packaging. If it's a meat, poultry, or egg product, be sure to record the establishment number. You will also need to give your name, address, phone numbers, and the contact information, if the complaint is being filed by someone else. Be sure to find out if there has been any illness or injury. If so, has a doctor been visited or was the health department involved in an investigation? If there was a foreign object in the food, get pictures and measurements.

Lesson 6: The Role of Inventory Management and Recordkeeping in Food Recalls

DO: (In Advance)

Prepare index cards for activity using **Motivational Quotes**. See directions below.

SAY:

We are ready to begin Lesson 6 of the *Responding to a Food Recall* course.

In your Participant's Workbook, locate the PowerPoint handout and the **Notes and Activity Sheet** for this lesson.

SHOW SLIDES: Lesson 6 Objectives (2 slides)

DO:

Read objectives for Lesson 6.

Divide the class into groups of five to six participants. Ask each group to select a reporter. Give each group an index card with a motivational quote or saying. Ask the groups to relate the quote to inventory management or food recalls. Allow approximately three minutes to complete the assignment. Ask the reporters selected for each group to report how they related the saying to today's topic. Transition to the first objective for this lesson.

Write each of the quotes below on a separate index card. You may have additional quotes that you would rather use that are more pertinent or challenging.

"A turtle only moves ahead by sticking out its neck."

“We cannot direct the wind...But we can adjust our sails.”

“There is nothing either good or bad except that thinking makes it so.”

Shakespeare

“Don't judge a man until you have walked a mile in his moccasins.”

C. Geronimo

“There's no traffic jam on the extra mile.”

“Never confuse activity with productivity.”

“Time flies, but remember, you are the navigator.”

“A diamond is a piece of coal that stuck to the job.”

“Even a woodpecker owes his success to the fact that he uses his head.”

M. Pratt

SAY:

Objective 1: Explain why an inventory management system is important when handling a recall of USDA Foods.

SAY:

Inventory management is critical to quickly and accurately determining the location of recalled food.

ASK:

How can an inventory management system assist you during a recall of USDA Foods?

DO:

Solicit answers from volunteers.

Some responses may include:

- Determine if recalled product was received.
- Track food products throughout kitchen.
- Determined if recalled product was served.

SAY:

The only way to have information readily available during a recall of USDA Foods is to have an effective inventory management system.

SHOW SLIDE: An Inventory Management System Shows

SAY:

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
- where and when it was distributed.

School records must be sufficient to track products served on specific dates and meals to ingredients and sources. When recalls occur, specific products must be identified as to the date received, used, disposed of, or isolated. The RA's operational practices can affect inventory management and their ability to effectively respond to a recall. The only way that this needed information can be readily available is to have an effective inventory management system in place for the School Food Authority and at the school site.

ASK:

How would the school's inventory be affected if a case containing 30 packages of the same product was received and the staff unpacked the case without keeping the identification information on the box?

SAY:

If a school received a case containing 30 packages of the same product and the packages were removed from the box prior to storage, the school may not be able to accurately identify the product in the event of a recall. The product identification information may be on the box, but not on the individual product packages. If the box is discarded, the school may not be able to report accurate numbers. Therefore, the SFA and SDA would not be accurately reporting quantities of affected USDA Foods remaining under their control. It is suggested that if packages or cans are removed from the cases, that identifying information either be written with a marker on the package or a portion of the product's original case with the information be kept until the product is served.

SAY:

Objective 2: Recognize the impact of the single inventory management system on a recall of USDA Foods.

SAY:

In accordance with the code of Federal regulations, 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.

SAY:

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

SAY:

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 (e.g., 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. Therefore the SFA must carefully review the recall notification sent by the SDA. The recall notification will have specific product identification information (e.g., product markings, such as can codes; lot numbers; and product dating) to help the SFA determine which cans of green beans are affected.

ASK:

Should you discard all of the cans of green beans in this situation? Why or why not?

SAY:

No. While it may seem effective to dispose of all cans of green beans, this action is not advised. The SFA will be reimbursed only for USDA Foods received originally. The specific product recall information is needed.

SAY:

Objective 3: Describe how food product tracking can be incorporated into an inventory management system.

SAY:

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 <http://www.nfsmi.org/>

SHOW SLIDE: Critical Tracking Events

SAY:

Critical tracking events at a school site include the point at which the product is received, the point at which the product is used in production, and the point at which the product is served, stored, and/or thrown out. If the product is used as a leftover, the time the product is reheated, served, and/or disposed of are also critical tracking events. When food is shipped to another location or transferred to another school, additional recordkeeping is necessary.

SHOW SLIDE: State-owned or Contracted Warehouses

SAY:

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), and
- conduct an annual review of facilities and document compliance with requirements.

SAY:

Objective 4: List four types of records that must be kept regarding USDA Foods.

SAY:

Accurate and complete records must be maintained by everyone – SDAs, RAs, processors, distributors, and storage facility operators – in order to properly identify USDA Foods that are subject to a recall.

SHOW SLIDE: Types of Records for USDA Foods

SAY:

The following records should be kept by each entity, as applicable to their operations, with respect to USDA Foods:

- inventory,
- distribution,
- storage, and
- disposal.

SAY:

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.

SAY:

Objective 5: Recall how long USDA requires records for recalls of USDA Foods be retained.

SAY:

All records related to a recall of USDA Foods 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.

DO:

Review answers on the **Note and Activity Sheet** for the lesson to be sure everyone has recorded the correct answers.

SUMMARY

SAY:

Accurate and complete records must be maintained by everyone, including SDAs, RAs, processors, distributors, and storage facility operators, in order to properly identify USDA Foods during a recall. An inventory management system is critical to determining, quickly and accurately, the location of the USDA Foods being recalled. If an SFA is using a single inventory management system, the specific product information provide as part of the recall notification must be used to identify the affected products.

Lesson 7: Destroying and Disposing of Foods Involved in a Recall of USDA Foods

SAY:

We are ready to begin Lesson 7 of the *Responding to a Food Recall* course.

In your Participant's Workbook, locate the PowerPoint handout and the **Notes and Activity Sheet** for this lesson.

SHOW SLIDE: Lesson 7 Objectives

DO:

Read objectives for Lesson 7.

Divide class into groups of five to six participants. Locate the **Opening Household Products Activity** for this activity in the Participant's Workbook. Give the groups approximately three minutes to relate the household items listed on the handout to food destruction and disposal that is the focus of today's lesson. Use the answer key to provide suggestions if the groups have difficulty with any of the items.

SAY:

Objective 1: Differentiate between the destruction and disposal of USDA Foods.

SAY:

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. FNS will provide information on how to destroy or dispose of the recalled food through the WBSCM RAS notification.

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 and local agencies responsible for environmental protection and/or solid waste management regulations.

SHOW SLIDE: State Contacts for Solid Waste Disposal Programs

SAY:

State contacts for programs related to solid waste disposal can be obtained at www.epa.gov/epawaste/wyl/Stateprograms.htm.

ASK:

Do the following scenarios result in the destruction or the disposal of USDA Foods?

1. Pouring bleach on the food
2. Placing the food in the garbage dumpster
3. Placing the food in the garbage disposal
4. Placing the food in a landfill

(If the participants answered destruction to question 1, and disposal to questions 2 and 3 and 4, they were correct!)

SAY:

Objective 2: Explain why and how destruction of USDA Foods can be verified.

SAY:

Verification of destruction is often required to provide accountability to the manufacturer or to establish the need for product replacement or cost reimbursement. A sample form from *Responding to a Food Recall: Procedures for Recalls of USDA Foods* is provided in the Participant's Workbook.

SHOW SLIDE: Sample Form

SAY:

You would use this form to document costs associated with the destruction of the recalled product. Note that there is a place on the form for two witnesses to sign that they have observed the destruction of the food.

ASK:

Why do you think that this procedure would be necessary?

SAY:

Objective 3: Examine a given case study to determine if the USDA Foods have been destroyed in accordance with procedures.

DO:

Locate the case study in the Participant's Workbook. Read the case study aloud to the participants. Ask them to reflect on the answers to the questions for one minute. Once they believe they have answered the questions, they should discuss the case study briefly with their group. Ask for volunteers to share the outcomes of the group discussions.

DO: *(Optional, if time permits.)*

Working in pairs, ask the participants to teach each other a one-minute lesson on destruction and disposal of USDA Foods. Rotate around the room and observe the pairs of participants making their presentations. Offer suggestions, as appropriate.

DO:

Review answers on the **Notes and Activity Sheet** for the lesson to be sure everyone has recorded the correct answers.

SUMMARY

SAY:

USDA will provide general information on what to do with recalled USDA Foods in their notification about the recall to SDAs. Destruction and disposal are two different processes. Information on proper methods of solid waste disposal must be obtained from the State contact responsible for environmental protection and solid waste management regulations.

Verification of destruction is often required to provide accountability to the manufacturer, or to establish the need for product replacement or cost reimbursement.

Lesson 8: Reimbursement of Costs for Foods Included in a Recall of USDA Foods

SAY:

We are ready to begin Lesson 8 of the *Responding to a Food Recall* course. Be sure to locate the PowerPoint handout and **Notes and Activity Sheet** so that you can make notes as we go through this lesson. You will also want to locate the Fact Sheet: **Questions and Answers about Steps in the Reimbursement Process for Recalled USDA Foods**. It will be a useful reference as we cover today's content.

SHOW SLIDE: Lesson 8 Objectives

DO:

Read objectives for Lesson 8.

SAY:

Objective 1: List four types of costs associated with USDA Foods that are reimbursable.

SAY:

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 authorized the Secretary of Agriculture to “reimburse SDAs and RAs for costs associated with the removal of commodities [USDA Foods], if the Secretary determined that the USDA Foods posed a health or safety risk.”

SHOW SLIDE: Reimbursement for Costs Associated with Removal of USDA Foods

SAY:

The law stipulates that reimbursable costs for USDA Foods are limited to:

- storage,
- transportation,
- processing, and
- 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.

SAY:

Objective 2: Given a specific situation, identify which agency is most likely to be responsible for replacing affected products and reimbursing local agencies for foods in a recall of USDA Foods.

SAY:

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.

SAY:

Objective 3: Explain the procedures that the Federal and State agencies will use to obtain reimbursement for the costs incurred due to a recall of USDA Foods.

SAY:

Different types of USDA Foods may be affected by a recall. Replacement and reimbursement instructions vary based upon the type of USDA Foods involved in the recall.

DO:

Refer participants to a chart, "Procedures for Reimbursement of Processing Costs Following a Recall of USDA Foods" in the Participant's Workbook. Participants should use this chart to answer the following questions about reimbursement of processing costs.

ASK:

Who is responsible for costs incurred by the SDA and RA when USDA Foods that have been delivered to the SDA in the same form as they were purchased are recalled (e.g., frozen ground beef purchased and delivered to the SDA as frozen ground beef)?

Answer: The first row on the Procedures for Reimbursement of Processing Costs Following a Recall of USDA Foods explains that the vendor of these USDA Foods assumes responsibility for the costs.

SAY:

The USDA may purchase raw product that is diverted for further processing. In some cases, the raw product may be the source of contamination resulting in a health or safety risk; 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.

ASK:

Who is responsible for costs incurred by the USDA, SDAs, and RAs when USDA Foods (raw chicken) has been processed into breaded, cooked chicken nuggets and the nuggets are determined to be a health and safety risk? The processor used the USDA Foods (raw chicken) and did not substitute an equivalent product.

Answer: The third row on the chart, Procedures for Reimbursement of Processing Costs Following a Recall of USDA Foods explains that the vendor of these USDA Foods is responsible for all costs incurred. Since USDA cannot make payments directly to these processors, the SDA must submit copies of paid processor bills, or invoices, with a reimbursement request.

How is the recall handled if the USDA Foods delivered to the processor were safe but the end product, such as the chicken nuggets was a health and safety risk, and the processor had substituted their equivalent chicken for the USDA raw chicken?

Answer: The fourth row on the chart, Procedures for Reimbursement of Processing Costs Following a Recall of USDA Foods indicates that this will be handled as a commercial recall.

SAY:

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.

SHOW SLIDE: General Steps in Reimbursement

DO:

Refer participants to **Fact Sheet Reimbursement for Recalled USDA Foods** located in the back of the Course Workbook. They should use it to follow the class discussion.

SAY:

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, also known as the State Agency.

ASK:

What are some specific examples of expenses that would be reimbursable?

SAY:

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; and
- d. destruction costs (e.g., bleach, plastic garbage bags, dump fees, and transportation to the disposal site, and/or landfill charges).

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

- a. storage at school level,
- b. overtime compensation for employees in conducting the recall,
- c. long-distance telephone calls and other associated administrative expenses, and
- 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 (FSA-21 form) 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.

a. SDAs report data through WBSCM on the amount of recalled food

- served,
- held or returned to vendor,
- re-donated,
- destroyed, and/or
- 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 to the FNS Regional Office:

- the public voucher (FSA-21),
- all supporting original receipts/invoices, and
- signed destruction forms.

The public voucher must include the SDA's Tax Identification Number (TIN).

4. The FNS Regional Office reviews the public voucher claims and documentation for completeness and submits it to the FNS National Office. The FNS 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. The AMS reviews and approves the expenses. Some expenses may be disallowed by AMS.

7. The 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.

DO:

Ask participants to locate the **Toolbox Activity** in the Participant's Workbook. Ask them to work in small groups to develop a list of "take aways" for their toolbox that represents the main ideas and concepts presented in today's course of recalls of USDA Foods. Give them about three minutes to complete the activity. Ask for volunteers to share their responses.

DO:

Review answers on the **Notes and Activity Sheet** for the lesson to be sure everyone has recorded the correct answers. After you have completed this review, ask participants to complete the post-assessment. Review the answers to the assessment by using the answer sheet provided.

SUMMARY

SAY:

Since no two recalls are alike, the reimbursement costs vary for different recalls. When USDA Foods are diverted for processing and if the processor substitutes an equivalent commercial product, the process becomes even more complicated.

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 SDA combines all RA reimbursement requests into one public voucher for the State. Only one payment is issued per State.

DO:

Ask participants to complete a course evaluation.