

# Responding to a Food Recall

## Participant's Workbook

**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 their 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 being 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 the disposal of  
USDA Foods.

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

**Objective 3:** 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 recalled 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.

### Four-hour Course Assessment

1. A food recall is:
  - a. Typically, a voluntary action by the manufacturer or distributor to remove a food from the market
  - b. Usually initiated by the food broker
  - c. Required by the Department of Health and Human Services
  - d. Never indicated unless there is a risk of death
  
2. A recall of USDA Foods initiated to ensure the safety of the foods for students may include all of the following reasons EXCEPT:
  - a. The food is unsafe
  - b. The food is of poor quality
  - c. The food is mislabeled
  - d. The food is adulterated
  
3. Adulterated food is impure, unsafe or unwholesome in nature.
  - a. True
  - b. False
  
4. Which class of food recall would be most likely to pose a health risk to those students who consumed the food?
  - a. Class I
  - b. Class II
  - c. Class III
  - d. Unidentified Class
  
5. Pizza that has a label that has not been positioned correctly on the box is an example of a \_\_\_\_\_ food recall.
  - a. Class I
  - b. Class II
  - c. Class III
  - d. Unidentified Class
  
6. The two Federal agencies responsible for regulating the food supply are:
  - a. DOD and FSIS
  - b. FSIS and FDA
  - c. CDC and FDA
  - d. FSA and FDA
  
7. Recalls of USDA Foods are almost always part of a bigger recall of commercial foods because USDA Foods are produced by the same manufacturers that sell to the commercial market.
  - a. True
  - b. False



8. Put the following steps in the proper sequence by writing the number one in the step that must be performed first and continuing on until the number four is written in the space provided for the last step that occurs.
  - a. \_\_\_\_\_ FNS notifies the State agency by placing an announcement in the RAS on the WBSCM system.
  - b. \_\_\_\_\_ FNS determines if USDA Foods are included in the food recall.
  - c. \_\_\_\_\_ School isolates recalled products in accordance with instructions
  - d. \_\_\_\_\_ FNS researches specific product identification information so that the recalled food product can be identified properly.
  
9. The website to sign up to receive food safety recall alerts is safefood.com.
  - a. True
  - b. False
  
10. Processors may substitute USDA Foods with like quantities of domestically produced, commercially purchased product, if the quality is equal to or better than the USDA product received.
  - a. True
  - b. False
  
11. Which agency is responsible for notifying the recipient agencies, such as local school systems, about recalls of USDA Foods?
  - a. State Distributing Agency
  - b. Food manufacturer
  - c. USDA FNS
  - d. In-State processor
  
12. All of the following information should be included in a complaint about USDA Foods provided to school nutrition programs EXCEPT:
  - a. Product name and number
  - b. Date your school received the product
  - c. Quantity of product involved
  - d. Date the product was scheduled to be used
  
13. When a complaint is filed about USDA Foods served by the school nutrition program, all of the following items should be retained EXCEPT:
  - a. Sample tray that was served
  - b. Original packaging or container
  - c. Foreign object present in the food
  - d. Any uneaten portions of the food
  
14. An effective inventory management system will help you during a recall of USDA Foods in all of the following ways EXCEPT:
  - a. Identify what foods are in inventory
  - b. Describe the product specifications used when purchasing the product
  - c. Identify where the product is stored
  - d. Identify when the product was received

15. Records that must be kept by RAs, SDAs, processors, distributors, and storage facility operators for use during a recall of USDA Foods include all of the following EXCEPT:
  - a. Amounts of product in inventory
  - b. Amounts of product distributed to other sites
  - c. Amounts of products that are needed for the next month of production
  - d. Amounts of products that have been used in production
  
16. USDA requires that food recall records be retained for:
  - a. 1 month
  - b. 1 school year
  - c. 2 fiscal years
  - d. 3 years following the end of the Federal fiscal year
  
17. Purposely adulterating the recalled food to make it inedible is:
  - a. Destruction of the food
  - b. A wasteful practice discouraged by USDA
  - c. The same as redirecting the USDA foods
  - d. An alternative to isolating the recalled product
  
18. Guidance on what to do with the recalled product are provided to the SDA by:
  - a. FDA
  - b. FNS USDA
  - c. The distributor
  - d. The manufacturer
  
19. Directions for disposal of the recalled food must be obtained from:
  - a. FDA
  - b. State and local agencies responsible for environmental protection
  - c. The food manufacturer
  - d. The local wellness committee
  
20. Reimbursable costs associated with the removal of USDA Foods may include costs for:
  - a. Storage, transportation, processing and distribution
  - b. Storage and transportation only
  - c. Handling the paperwork and records required
  - d. landfill charges only

## Lesson 1: Introduction to the Food Recall Process

### Notes and Activity Sheet

Directions: Complete the following statements.

1. A \_\_\_\_\_ is an action by a manufacturer or distributor to remove a food product from the market because it may cause health problems or death.
2. Foods may be recalled because they are \_\_\_\_\_,  
\_\_\_\_\_, or \_\_\_\_\_.
3. Foods that contain pathogens, foreign materials or undeclared allergens are \_\_\_\_\_.
4. The three agencies responsible for purchasing USDA Foods used in school meals are:
  - 
  - 
  -
5. Directions: Which of the three agencies listed in Column A purchase the food items listed in Column B?

Column A	Column B
AMS	_____ Fresh fruits and vegetables
FSA	_____ Egg products
DOD	_____ Peanut butter
	_____ Whole wheat flour
	_____ Beef patties
	_____ Turkey roasts

## Lesson 1: Introduction to the Food Recall Process

### Notes and Activity Sheet ANSWER KEY

Directions: Complete the following statements.

1. 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.
2. Foods may be recalled because they are unsafe, adulterated, or mislabeled.
3. Foods that contain pathogens, foreign materials, or undeclared allergens are adulterated.
4. The three agencies responsible for purchasing USDA foods used in school meals are:
  - **Agricultural Marketing Service (AMS)**
  - **USDA Farm Service Agency (FSA)**
  - **Department of Defense (DOD)**
5. Directions: Which of the three agencies listed in Column A purchase the food items listed in Column B?

Column A	Column B
AMS	<u>DOD or AMS</u> Fresh fruits and vegetables
FSA	<u>AMS</u> Egg products
DOD	<u>FSA</u> Peanut butter
	<u>FSA</u> Whole wheat flour
	<u>AMS</u> Beef patties
	<u>AMS</u> Turkey roasts

## Lesson 2: In-depth: Food Recall Process of USDA Foods

### Notes and Activity Sheet

1. Directions: Which of the five methods listed in Column A is most likely to have been used to identify the need for a food recall? Place the corresponding letter in Column B.

Column A	Column B
A. Manufacturers' Tests	___ Food label is missing product number and pack date.
B. Product Sampling Test Results	___ There is an outbreak of Salmonella poisoning.
C. Field Inspections by Regulatory Agency	___ Sick animals were found to be entering the food supply.
D. Epidemiologic Data	___ Peanut particles were found in several packages of the product.
E. Administrative Recall	___ Pieces of plastic were found by the quality control unit in several cases of the product.
	___ Ground beef found to be of unacceptable quality

2. Directions: Determine which food recall classification (listed as A-C) applies to each of the examples. Place the corresponding letter in Column B.

Column A	Column B
A. Class I	___ Food label is missing product number and pack date.
B. Class II	___ There is an outbreak of Salmonella poisoning.
C. Class III	___ Sick animals were found to be entering the food supply.
	___ Peanut particles were found in the manufacturing area.
	___ Pieces of plastic were found in several cases of the product.

3. Directions: Draw an illustration that reflects the communication channels that are used when a school is notified of a recall of USDA Foods.

## Lesson 2: In-depth: Food Recall Process of USDA Foods

### Notes and Activity Sheet ANSWER KEY

1. Directions: Which of the four methods listed in Column A is most likely to have been used to identify the need for a food recall? Place the corresponding letter in Column B.

Column A	Column B
A. Manufacturers' Tests	<u>C</u> Food label is missing product number and pack date.
B. Product Sampling Test Results	<u>B or D</u> Outbreak of Salmonella poisoning
C. Field Inspections by Regulatory Agency	<u>C</u> Sick animals were found to be entering the food supply
D. Epidemiologic data	<u>B</u> Peanut particles were found in several packages of the product
E. Administrative recall	<u>A</u> Pieces of plastic found by the quality control unit in several cases of the product
	<u>E</u> Ground beef found to be of unacceptable quality

2. Directions: Determine which food recall classification (listed as A-C) applies to each of the examples. Place the corresponding letter in Column B.

Column A	Column B
A. Class I	<u>C</u> Food label is missing product number and pack date.
B. Class II	<u>A</u> Outbreak of Salmonella poisoning
C. Class III	<u>A</u> Sick animals were found to be entering the food supply.
	<u>B</u> Peanut particles were found in the manufacturing area.
	<u>B</u> Pieces of plastic were found in several cases of the product.

3. Directions: Draw an illustration that reflects the communication channels that are used when a school is notified of a recall of USDA Foods.

Answer: **See PowerPoint slide provided.**



## Food Recall Classes

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

## Lesson 2

### Methods of Communication Recalls of USDA Foods

In addition to contacting the SDA through the RAS of the WBSCM, 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/](http://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.

Source: National Food Service Management Institute. (2012). Responding to a food recall: Procedures for recalls of USDA foods. University, MS: Author.

## Recall -- Firm Press Release

FDA posts press releases and other notices of recalls and market withdrawals from the firms involved as a service to consumers, the media, and other interested parties. FDA does not endorse either the product or the company.

### **General Mills Voluntarily Recalls Single-Serve Reduced-Sugar Cinnamon Toast Crunch Bowlpak sold in Foodservice Establishments**

***No Other Varieties or Sizes of Cinnamon Toast Crunch Are  
Involved***

#### **Contact**

Consumer:

1-800-328-1144

Media:

Kirstie Foster

763-764-6364

[media.line@genmills.com](mailto:media.line@genmills.com)

**FOR IMMEDIATE RELEASE** - June 3, 2013 - General Mills announced today a voluntary Class I recall of a small quantity of single-serve reduced-sugar Cinnamon Toast Crunch bowlpak sold in foodservice establishments.

This action is being taken as a precaution because the company was notified by an ingredient supplier that it had recalled an ingredient due to the possible presence of salmonella. No illnesses have been associated with this finding.

The recall affects approximately 168 cases of product. No other varieties or sizes of Cinnamon Toast Crunch are involved. No other General Mills products are impacted. This voluntary recall includes single-serve reduced-sugar Cinnamon Toast Crunch bowlpaks with the following "Better if Used By" dates printed on the package:

**31AUG2013**

**02SEP2013**

Foodservice operators or consumers who have this product are urged to dispose of the product and contact General Mills toll-free at 1-800-328-1144 for a replacement.

Salmonella is an organism that can cause serious and sometimes fatal infections, particularly in young children, the elderly and people with weakened immune systems. Healthy people infected with salmonella often experience fever, diarrhea, nausea, vomiting and/or abdominal pain. For more information, visit the Centers for Disease Control and Prevention's Website at <http://www.cdc.gov>.

General Mills is one of the world's leading food companies, operating in more than 100 countries. Its brands include Cheerios, Fiber One, Häagen-Dazs, Nature Valley, Yoplait, Betty Crocker, Pillsbury, Green Giant, Old El Paso, and Wanchai Ferry. Headquartered in Minneapolis, Minn., USA, General Mills had fiscal 2012 worldwide sales of US \$16.7 billion.

###

[RSS Feed for FDA Recalls Information](#) [\[what's this?\]](#)

[Photo: Product Labels](#)

Recalled Product Photos Are Also Available on FDA's [Flickr Photostream](#).

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

### Notes and Activity Sheet

Directions: Complete the following statements.

1. Name the two Federal agencies responsible for ensuring the safety of food and regulating the food supply.
  - 
  -
2. FSIS and FDA \_\_\_\_\_ the recall process to ensure that the appropriate actions have been taken to protect public health. They can take \_\_\_\_\_ action and conduct \_\_\_\_\_ checks to verify that the company was diligent in notifying its \_\_\_\_\_.
3. Recalls of USDA Foods are always a part of a bigger recall of \_\_\_\_\_ products because USDA Foods are produced by the same \_\_\_\_\_ that sell to the commercial market.
4. When USDA Foods are involved in the recall, FNS obtains purchase information about the recalled product from \_\_\_\_\_ or \_\_\_\_\_.
5. FNS notifies the State distributing agencies by using the \_\_\_\_\_ in the \_\_\_\_\_  
\_\_\_\_\_ Notices are sent within \_\_\_\_\_ hours of recall notification.
6. List eight items that are need as part of the specific product information so that recalled product can be accurately identified.
  - 
  - 
  - 
  -

- 
- 
- 
- 

7. \_\_\_\_\_ contacts all \_\_\_\_\_ that received bulk USDA Foods directly from USDA for further processing.

8. The \_\_\_\_\_ is responsible for notifying all of their customers who purchased end products containing the USDA Food being recalled.

9. The \_\_\_\_\_ must notify all RAs, in-State processors and State contracted distributors about the food being recalled.

10. \_\_\_\_\_ must notify all entities to which they have distributed recalled foods, including any processor to which that they have \_\_\_\_\_ the recalled product.

11. Upon receiving notification, RAs must \_\_\_\_\_ the product and \_\_\_\_\_ the item so that it is not used.

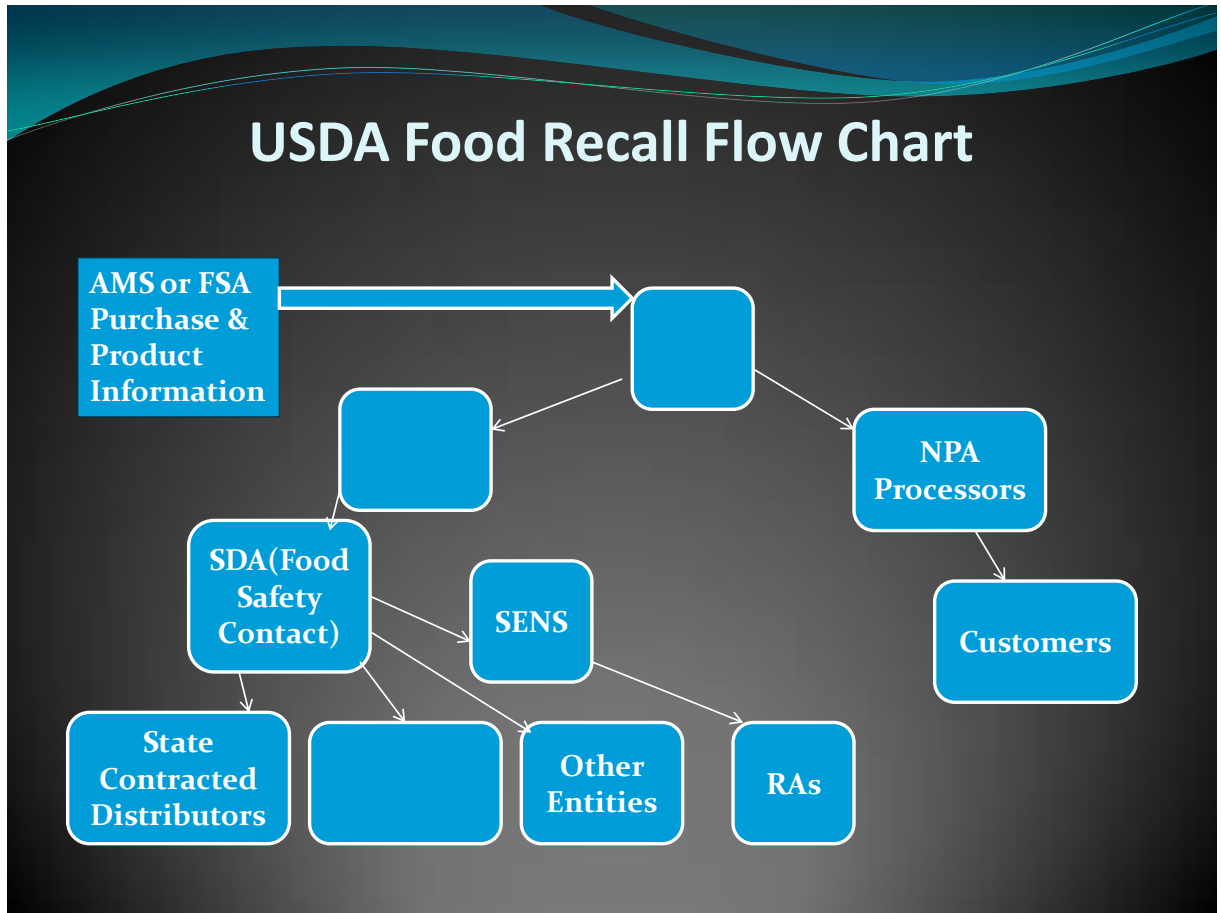
12. RAs must \_\_\_\_\_ the recalled food and report the information to the \_\_\_\_\_ within \_\_\_\_\_ hours.

13. RAs should determine the following about the recalled product:

- 
- 
- 
- 

14. The State Distributing Agencies report the inventory information to \_\_\_\_\_.

15. Fill in the missing information on the flow chart:



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

### Notes and Activity Sheet ANSWER KEY

Directions: Complete the following statements.

1. Name the two Federal agencies responsible for ensuring the safety of food and regulating the food supply.
  - **FSIS-Food Safety and Inspection Service of the United States  
Department of Agriculture (USDA)**
  - **FDA-Food and Drug Administration of the United States Department  
of Health and Human Services (DHHS)**
2. FSIS and FDA oversee the recall process to ensure that the appropriate actions have been taken to protect public health. They can take administrative action and conduct effectiveness checks to verify that the company was diligent in notifying its consignees.
3. Recalls of USDA Foods are always a part of a bigger recall of commercial products because USDA Foods are produced by the same manufacturers that sell to the commercial market.
4. When USDA Foods are involved in the recall, FNS obtains purchase information about the recalled product from AMS (USDA Agricultural Marketing Service) or FSA (USDA Farm Service Agency).
5. FNS notifies the State Distributing Agencies by using the RAS (Rapid Alert System) in the WBSCM (Web-Based Supply Chain Management System). Notices are sent within 24 hours of recall notification.
6. List eight items that are need as part of the specific product information so that recalled product can be accurately identified.
  - **Company name**
  - **Brand name**
  - **Case markings**
  - **Establishment number (for meat, poultry, or egg products)**



- **Product markings**

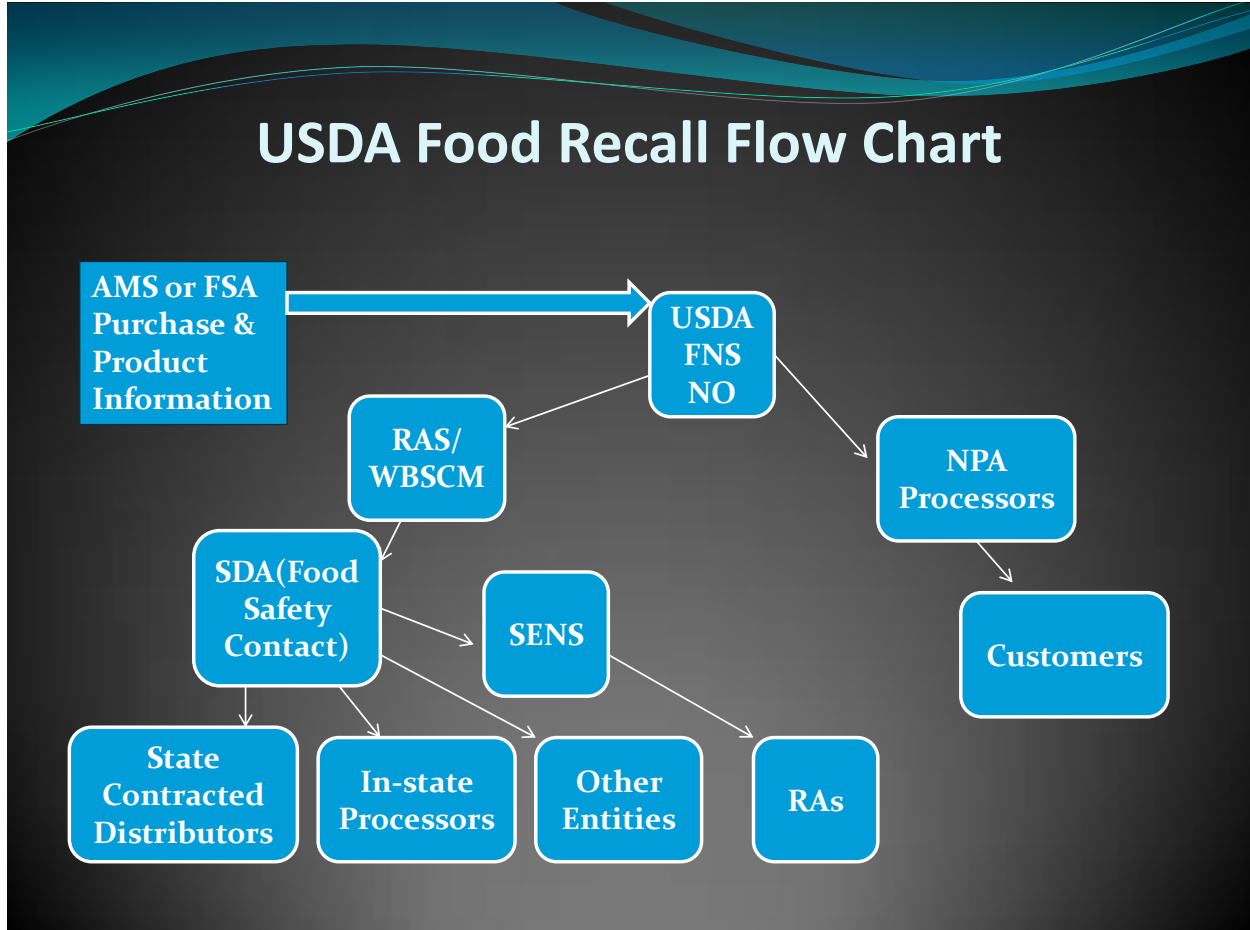
- i. **Can codes**

- ii. **Lot numbers**

- iii. **Product dating, such as sell-by-date or use-by date**

7. FNS contacts all processors that received bulk USDA Foods directly from USDA for further processing.
8. The processor is responsible for notifying all of their customers who purchased end products containing USDA Foods being recalled.
9. The State Distributing Agency must notify all RAs, in-State processors and State contracted distributors about the food being recalled.
10. Recipient Agency (RA) must notify all entities to which they have distributed recalled foods, including any processor to which that they have redirected the recalled product.
11. Upon receiving notification, RAs must isolate the product and label the item so that it is not used.
12. RAs must inventory the recalled food and report the information to the State Distributing Agency within 48 hours.
13. RAs should determine the following about the recalled product:
  - **amount served;**
  - **amount remaining in schools, warehouses and at distributors;**
  - **amount further distributed to program participants; and**
  - **amount redirected for further processing.**
14. The State Distributing Agencies report the inventory information to FNS.

15. Fill in the missing information on the flow chart:



## Lesson 3: Functions of Federal and State Agencies

### FSIS

- Regulates meat, poultry, and egg products.
- Oversees the effectiveness of the recall process.
- Requires a food recall, if necessary.

### FDA

- Ensures the safety of fruits, vegetables, and dairy products in the food supply.
- Oversees the effectiveness of the recall process.
- Requires a food recall, if necessary.

### FNS

- Notifies SDAs that received the recalled USDA Foods.
- Contacts processors that received bulk foods from USDA.
- Provides instructions on product disposition and the reimbursement process.

### AMS

- Purchases USDA Foods on the commercial market.
- Provides purchase information (i.e., amount of product, delivery date, and location of shipments) pertaining to recalled foods.
- Works with manufacturer to determine if recalled product will be picked up or destroyed by RA.

### FSA

- Purchase USDA Foods on the commercial market.
- Provide purchase information (amount of product, delivery date, and location of shipments) pertaining to recalled foods.
- Works with manufacturer to determine if recalled product will be picked up or destroyed by RA.

## **SDA**

- Notifies RA about recalled USDA Foods.
- Contacts in-State processors and contracted distributors.
- Compiles inventory information from all entities in the State.

## **ROLES AND RESPONSIBILITIES**

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

### **Federal Agency Responsibilities**

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

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

- FNS, in consultation with the responsible regulatory agency, procurement agency, and vendor, provides general instructions to SDAs on product disposition and the reimbursement process for expenses related to the recall.

## **State Agency Responsibilities**

Each State agency has the following responsibilities:

- Have recall procedures in place.
- Implement the recall procedures upon notification of a recall of USDA Foods.
- Assign a State Food Safety Coordinator and an alternate, and submit the names, titles, email addresses, and telephone and fax numbers of the coordinator and alternate to FNS through WBSCM. To speed the notification process, contact information should be provided for 24 hour access.
- Establish a notification system for food safety contacts at each of its RAs. This system should have two contacts per RA and be verified annually. SDAs may use the USDA SENS, or some other communication system, to notify RAs about recalls.
- Contact RAs as soon as possible, but within 24 hours or less, after receiving a recall notification. To the extent possible, SDAs should confirm receipt of the notification by the RAs to ensure that the message was received and understood. SDAs will provide product identification information needed by RAs to track the product, and instructions on removing and isolating the affected food.
- Provide specific product disposal instructions to RAs. Requirements for solid waste disposal differ among jurisdictions. Information on proper methods of disposal must be obtained from State or local agencies responsible for environmental protection and/or solid waste regulations. State contacts for programs related to solid waste disposal can be obtained at [www.epa.gov/epawaste/wyl/Stateprograms.htm](http://www.epa.gov/epawaste/wyl/Stateprograms.htm).
- Contact the in-State processors and State-contracted distributors, directing them to isolate the affected USDA Foods and to determine:
  - The amount of recalled product still in storage for the SDA, and

- The location and amount of product delivered to RAs.
- Compile inventory data from RAs, processors, and distributors, and submit data to FNS on the WBSCM recall response form in accordance with FNS instructions.
- Complete recall reimbursement claims paperwork, including the destruction verification form and the FSA21 public voucher form with a Tax Identification Number (TIN), and submit paperwork to the FNS Regional Office.

## **Recipient Agency Responsibilities**

Each RA has the following responsibilities:

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

- Follow applicable destruction/disposal instructions provided by the SDA.

## **Processor Responsibilities**

Each processor has the following responsibilities:

- Have recall procedures in place.
- Implement the recall procedures upon notification of a recall of USDA Foods.
- Identify and isolate all food products produced from the affected USDA Foods immediately upon notification of a recall.
- Contact all SDAs, RAs, and distributors that received affected product directly from them, immediately, ideally in 24 hours or less. Provide specific product identification information to these entities to help them identify affected products. Maintain documentation confirming that entities received the recall message.
- Compile information received from distributors regarding quantity of product remaining at the distributor site, and the quantity of product shipped to each RA. Report information to SDA. USDA NPA processors also will report findings directly to FNS.
- Notify SDAs with whom they have agreements, but who did not receive affected products, about the recall and confirm that the SDA is not affected.

## **Distributor Responsibilities**

Each distributor has the following responsibilities:

- Have recall procedures in place.
- Implement the recall procedures upon notification of a recall of USDA Foods.
- Identify and isolate affected products still under their control immediately upon notification of a recall.
- Contact entities that received affected product directly from them, immediately, ideally in 24 hours or less. Maintain documentation confirming that entities received the recall message.



- Provide information to the processor and vendor (i.e., the entity that contracted with them to distribute the food) on the quantity of products in storage, and the amount shipped to individual RAs and other entities.

Dispose of recalled foods under their control in accordance with Federal, State, and local regulations and procedures, and in consultation with the processor or vendor. Requirements for solid waste disposal differ among jurisdictions. Information on proper methods of disposal must be obtained from State or local agencies responsible for environmental protection and/or solid waste regulations. State contacts for programs related to solid waste disposal can be obtained at [www.epa.gov/epawaste/wyl/stateprograms.htm](http://www.epa.gov/epawaste/wyl/stateprograms.htm).

Source: National Food Service Management Institute. (2012). Responding to a food recall: Procedures for recalls of USDA foods. University, MS: Author.

### Lesson 3: Whose Responsibility? Activity

#### Levels of Responsibility

Directions: Indicate in the space provided whose responsibility it would be to perform each of the tasks listed below. Include all of the levels of responsibilities that apply.

Tasks may have a single level or multiple levels.

#### Levels of Responsibility

F=Federal Agency

S=State Agency

R=Recipient Agency

P=Processor

D=Distributor

Whose responsibility is it to perform the following tasks?

\_\_\_\_\_ Notify you at the school level about the recall.

\_\_\_\_\_ Notify the school system about the recall.

\_\_\_\_\_ Issue a press release for the public.

\_\_\_\_\_ Post information on the website for the public.

\_\_\_\_\_ Develop a food recall procedure.

\_\_\_\_\_ Identify recalled product that is still under their control.

\_\_\_\_\_ Provide specific product information to help identify the affected products.

\_\_\_\_\_ Provide instructions on product disposition.

\_\_\_\_\_ Conduct an inventory assessment to determine the amount of product that has been served and the amount that is remaining in stock.

\_\_\_\_\_ Notify the school districts with which they had agreements but who did not receive affected products, about the recall and confirm that the school district is not affected.

\_\_\_\_\_ Implement the food recall procedures.

- \_\_\_\_\_ Contact entities that received affected product directly from them immediately.
- \_\_\_\_\_ Dispose of the recalled foods under their control in accordance with Federal, State, and local regulations and procedures.
- \_\_\_\_\_ Obtain needed information on solid waste disposal.
- \_\_\_\_\_ Compile inventory data.
- \_\_\_\_\_ Complete recall reimbursement claim paperwork in accordance with instructions.
- \_\_\_\_\_ Contact processors that received recalled bulk product directly from USDA.

### Lesson 3: Whose Responsibility? Activity ANSWER KEY

Directions: Indicate in the space provided whose responsibility it would be to perform each of the tasks listed. Include all of the levels of responsibilities that apply. Tasks may have a single level or multiple levels.

#### Levels of Responsibility

F=Federal Agency

S=State Agency

R=Recipient Agency

P=Processor

D=Distributor

Whose responsibility is it to perform the following tasks?

  R   Notify you at the school level about the recall.

  S   Notify the school system about the recall.

  F   Issue a press release for the public.

  F   Post information on the website for the public.

  R   Develop a food recall procedure.

S,R,P, D Identify recalled product that is still under their control.

  F   Provide specific product information to help identify the affected products.

  F   Provide instructions on product disposition.

R, P, D Conduct an inventory assessment to determine the amount of product that has been served and the amount that is remaining in stock.

  P   Notify the school districts with whom they had agreements but who did not receive affected products, about the recall and confirm that the school district is not affected.

F, S, R, P, D Implement the food recall procedures.

R, P, D Contact entities that received affected product directly from them immediately.

**R, P, D** Dispose of the recalled foods under their control in accordance with Federal, State, and local regulations and procedures.

**R, P, D** Obtain needed information on solid waste disposal.

**F, S** Compile inventory data.

**F, S, R, P, D** Complete recall reimbursement claim paperwork in accordance with instructions.

**F** Contact processors that received recalled bulk product directly from USDA.

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

### Notes and Activity Sheet

Directions: Complete the following statements.

1. The website to sign up for food safety recall alerts is  
www.\_\_\_\_\_.
2. The decision to have USDA Foods processed into finished products can be made  
at the \_\_\_\_\_, \_\_\_\_\_, or  
\_\_\_\_\_ level.
3. Processors may \_\_\_\_\_ USDA Foods with like  
\_\_\_\_\_ of domestically produced, commercially purchased product  
if it is \_\_\_\_\_ and of \_\_\_\_\_ quality or better.
4. Processors are responsible for \_\_\_\_\_ substitutions in case  
of a food recall.
5. Processors are responsible for notifying their \_\_\_\_\_  
about food recalls.
6. National Processing Agreement processors are contacted directly by  
\_\_\_\_\_ about food recalls.
7. The \_\_\_\_\_ determines whether the recalled product was used  
to produce finished products for recipient agencies.
8. If recalled USDA Foods were substituted with commercially purchased food, the  
recall is considered a \_\_\_\_\_ recall.
9. If recalled USDA Foods were used to make a finished product for recipient  
agencies, the processor notifies \_\_\_\_\_  
\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, and  
\_\_\_\_\_ that received the affected product from them.
10. The \_\_\_\_\_ provide information to the processor about the  
quantity of product remaining in their \_\_\_\_\_ and the quantity of  
product delivered to each recipient agency.

11. When the State Distributing Agency selects the processor and negotiates end products that will be produced, the processor is referred to as an \_\_\_\_\_  
\_\_\_\_\_.
12. The \_\_\_\_\_ is responsible for contacting the in-State processor.
13. The \_\_\_\_\_ determines whether the recalled food was used to make finished products for the RA or if it was substituted with commercially purchased food. If the recalled food was substituted with commercially purchased food, the recall is considered a \_\_\_\_\_ recall and FNS does not track the finished product.
14. Recipient agencies that have \_\_\_\_\_ recalled products for further processing are responsible for contacting all further processors.
15. Local school districts should have a \_\_\_\_\_  
\_\_\_\_\_ in place to handle a food recall when notified.

Directions: Use any references or notes that you have available to complete the following chart:

<b>Contacted by</b>	<b>Agency Name</b>	<b>Actions Taken</b>
	<b>FNS USDA</b>	
	<b>SDA</b>	
	<b>RA</b>	



	<b>Processor</b>	
	<b>Distributor</b>	

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

### Notes and Activity Sheet ANSWER KEY

Directions: Complete the following statements.

1. The website to sign up for food safety recall alerts is [www.FoodSafety.gov/recalls](http://www.FoodSafety.gov/recalls).
2. The decision to have USDA Foods processed into finished products can be made at the Federal, State, or local level.
3. Processors may substitute USDA Foods with like quantities of domestically produced, commercially purchased product, if it is comparable and of equal quality or better.
4. Processors are responsible for tracking substitutions in case of a food recall.
5. Processors are responsible for notifying their consignees about food recalls.
6. National Processing Agreement processors are contacted directly by USDA FNS about food recalls.
7. The processor determines whether the recalled product was used to produce finished products for recipient agencies.
8. If recalled USDA Foods were substituted with commercially purchased food, the recall is considered a commercial recall.
9. If recalled USDA Foods were used to make a finished product for recipient agencies, the processor notifies State Distributing Agencies, recipient agencies, and distributors that received the affected product from them.
10. The distributors provide information to the processor about the quantity of product remaining in their inventory and the quantity of product delivered to each recipient agency.

11. When the State Distributing Agency selects the processor and negotiates end products that will be produced, the processor is referred to as an in - State processor.
12. The State Distributing Agency is responsible for contacting the in-State processor.
13. The in-State processor determines whether the recalled food was used to make finished products for the RA or if it was substituted with commercially purchased food. If the recalled food was substituted with commercially purchased food, the recall is considered a commercial recall and FNS does not track the finished product.
14. Recipient agencies that have redirected recalled products for further processing are responsible for contacting all further processors.
15. Local school districts should have a Standard Operating Procedures in place to handle a food recall when notified.

Directions: Use any references or notes that you have available to complete the following chart:

<b>Contacted by</b>	<b>Agency Name</b>	<b>Actions Taken</b>
Regulatory Agencies (FSIS or FDA) or Purchasing Agencies (AMS or FSA) or Manufacturer	<b>FNS USDA</b>	Notifies SDAs Provides product identification information Contacts processors receiving bulk USDA Foods Provides guidance on what to do with recalled food Processes reimbursement claims
FNS	<b>SDA</b>	Notifies RAs Contacts In-State processors Contacts contracted distributors Compiles inventory data reported by RAs Submits reimbursement claims to FNS
SDA	<b>RA</b>	Notifies all sites about recall Isolates affected products Labels products to prevent usage Contacts further processors Conducts an inventory assessment Submits inventory data to SDA

		Destroys and disposes of product in accordance with guidance provided
FNS, SDA and/or RA	<b>Processor</b>	<p>Maintains records of substitution</p> <p>Isolates affected products</p> <p>Contacts all customers who received affected product from them</p> <p>Compiles and reports inventory information</p> <p>Destroys and disposes of product in accordance with guidance provided</p>
SDA, Processor	<b>Distributor</b>	<p>Isolates affected products</p> <p>Contacts all customers who received affected product from them</p> <p>Compiles and reports inventory information</p> <p>Destroys and disposes of product in accordance with guidance provided</p>

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### Recalls & Alerts

A food recall occurs when there is reason to believe that a food may cause consumers to become ill. A food manufacturer or distributor initiates the recall to take foods off the market. In some situations, food recalls are requested by government agencies (USDA or FDA).

Some reasons for recalling food include:

- Discovery of an organism in a product which may make consumers sick
- Discovery of a potential allergen in a product
- Mislabeling or misbranding of food. For example, a food may contain an allergen, such as nuts or eggs, but those ingredients do not appear on the label.

**See Recent Recalls**  
View notices of food recalls and alerts from both the FDA and USDA on one page.

**Get Automatic Alerts**  
Find out how to get the latest information on food recalls and alerts, including allergy alerts.

**Get Food Safety Widget**

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## Preparing for a Food Recall Handout

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

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

### PROCEDURES

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

Source: National Food Service Management Institute. (2012). Responding to a food recall: Procedures for recalls of USDA foods. University, MS: Author.

## Responding to a Food Recall Handout

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

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

### PROCEDURES

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



- The amount of affected product received by the district.
  - The locations of the affected product, and quantity shipped to each location.
- When possible, verify that affected items bear the product identification code(s) and production date(s) listed in the recall notice.
- The status of the affected product (e.g., amount used, amount isolated) at each location.

8. Account for all recalled product by verifying inventory counts against records of food received by the district and at each feeding site.

9. Report information on recalled USDA Foods to the SDA as soon as possible, ideally in 48 hours or less.

- Report quantity and location of all recalled product received and isolated.
- Submit documentation requested by SDA for recall reimbursement claims.

10. Determine if the recalled product is to be returned and to whom; or it is to be destroyed, by whom, and with what documentation.

11. Do not destroy any USDA Foods without written notification from the State Distributing Agency (SDA), or the State or local health department.

12. Arrange for food to be collected and disposed of as soon as possible, and within the timeframe identified in the recall notice instructions.

13. Document reimbursable costs associated with the recall of USDA Foods, and submit to the SDA.

## **MONITORING**

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

## **CORRECTIVE ACTION**

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

## VERIFICATION AND RECORD KEEPING

1. Employees will:

- Record the name, product code, lot number, and quantity of the recalled food.
- Record the date and time of destruction/disposal of the recalled food.

2. The foodservice manager will:

- Verify that appropriate corrective actions are taken by reviewing, initialing, and dating recall records.
- Maintain the recall records for a minimum of three years.

3. A school district representative will complete and maintain all required documentation related to the recall including:

- Recall notice,
- Inventory records,
- Records of how food product was returned or destroyed,
- Reimbursable costs,
- Public notice and media communication, and
- Correspondence to and from the public health department and SDA.

**DATE IMPLEMENTED:** \_\_\_\_\_ **BY:** \_\_\_\_\_

**DATE REVIEWED:** \_\_\_\_\_ **BY:** \_\_\_\_\_

**DATE REVISED:** \_\_\_\_\_ **BY:** \_\_\_\_\_

Source: National Food Service Management Institute. (2012). Responding to a food recall: Procedures for recalls of USDA foods. University, MS: Author.

## Handling a Food Recall

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

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

#### **PROCEDURES:**

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

7. Do not destroy any products until directed to do so by a district office official (e.g., School Nutrition Director). If directed to dispose of a product, follow the disposal instructions provided by the district office.
8. Consult with the district office if recalled food was further distributed to additional serving sites to coordinate recall notification and response at these sites. Provide the district office with the serving site locations, quantity of affected food distributed to each location, and dates affected food was distributed.

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

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

**MONITORING:**

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

**CORRECTIVE ACTION:**

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

**VERIFICATION AND RECORD KEEPING:**

1. Employees will:
  - Record the name, product code, lot number, and quantity of the recalled food received.
  - Record the quantity of affected food used and quantity isolated.
  - Record the date and time of destruction/disposal of the affected food.
2. The foodservice manager will:
  - Verify that appropriate corrective actions are taken by reviewing, initialing, and dating recall records.
  - Maintain the recall records for a minimum of three years.

2. A school district representative will update the perpetual inventory record with adjustment for the recalled product.

**DATE IMPLEMENTED:** \_\_\_\_\_ **BY:** \_\_\_\_\_

**DATE REVIEWED:** \_\_\_\_\_ **BY:** \_\_\_\_\_

**DATE REVISED:** \_\_\_\_\_ **BY:** \_\_\_\_\_

Source: National Food Service Management Institute. (2012). Responding to a food recall: Procedures for recalls of USDA foods. University, MS: Author.

## **Lesson 4: Sample Standard Operating Procedures for Mountain Springs School District**

### **Responding to a Recall of USDA Foods**

Directions: Read the standard operating procedure below. After you have read the procedure, work with others in your group to answer the questions that follow.

1. The School Nutrition Director serves as the food safety contact to receive the alert from the State Distributing Agency. The school nutrition bookkeeper is the back-up food safety contact if the director should not be accessible.
2. As soon as the director is notified, he/she notifies the bookkeeper. The bookkeeper has access to inventory levels from the end of the last operating month as well as invoices for products received during this operating month. Once the director and the bookkeeper determine which schools have received any of the recalled products, they immediately notify all entities. This notification must take place within 24 hours of receiving notification from the SDA.
3. The school district has redirected several products for processing. If any of the recalled product has been sent for further processing, the director must also notify the manufacturer within 24 hours.
4. The managers in the school district must isolate and label the recalled product so that it will not be used.
5. The managers in the school are also responsible for inventory of the product to determine the amount of the food that has been:
  - Served;
  - Stored in schools, their warehouse, or with distributors;
  - Further distributed to satellite schools; and/or
  - Redirected for processing.
6. The manager reports the inventory numbers to the bookkeeper who compiles the report for the director.
7. The director reviews the reports submitted by the manager and submits the report to the SDA within 48 hours of the original notification.

## Discussion Questions

1. Does the standard operating procedure above address all of the steps required for handling a recall of USDA Foods?
2. Does this standard operating procedure adhere to the recommended flow of communication for handling a recall of USDA Foods?
3. Are there additional aspects of the food recall process that need to be included?
4. Are there parts of the procedures that need to be deleted or modified?
5. Does this SOP apply to a recall of commercial foods? If not, what needs to be added or changed?

## **Lesson 4: Sample Standard Operating Procedures for Mountain Springs School District ANSWER KEY**

### **Responding to a Recall of USDA Foods**

Directions: Read the standard operating procedure below. After you have read the procedure, work with others in your group to answer the questions that follow.

1. The school nutrition director serves as the food safety contact to receive the alert from the State Distributing Agency. The school nutrition bookkeeper is the back-up food safety contact if the director should not be accessible.
2. As soon as the director is notified, she notifies the bookkeeper. The bookkeeper has access to inventory levels from the end of the last operating month as well as invoices for products received during this operating month. Once the director and the bookkeeper determine which schools have received any of the recalled products, they immediately notify all entities. This notification must take place within 24 hours of receiving notification from the SDA.
3. The school district has redirected several products for processing. If any of the recalled product has been sent for further processing, the director must also notify the manufacturer within 24 hours.
4. The managers in the school district must isolate and label the recalled product so that it will not be used.
5. The managers in the school are also responsible for inventory of the product to determine the amount of the food that has been:
  - Served;
  - Stored in schools, their warehouse, or with distributors;
  - Further distributed to satellite schools; and/or
  - Redirected for processing.
6. The managers report the inventory numbers to the bookkeeper who compiles the report for the director.
7. The director reviews the reports submitted by the manager and submits the report to the SDA within 48 hours of the original notification.



## Discussion Questions

1. Does the standard operating procedure above address all of the steps required for handling a recall of USDA Foods?
  - **Does not include reporting back to the SDA that the notice was received and understood.**
  - **Does not address the return or destruction of the USDA Foods.**
  - **Does not state that the RA will provide feedback to SDA that the activity was completed.**
2. Does this standard operating procedure adhere to the recommended flow of communication for handling a recall of USDA Foods?
  - **Yes, but some parts of the procedure need to be written more clearly.**
3. Are there additional aspects of the food recall process that need to be included?
  - **It is helpful to have a separate procedure for the school site level.**
  - **Identify how to handle the public relations aspect of the recall.**
  - **Notification of administration of school district about the recall.**
  - **Training for staff on how to respond to a recall of USDA Foods.**
  - **Tracking of compliance through email documentation.**
4. Are there parts of the procedures that need to be deleted or modified?
  - **No, make additions noted above.**
  - **Be more specific.**
5. Does this SOP apply to a recall of commercial foods? If not, what needs to be added or changed?
  - **The School Nutrition Director needs to know if the State Distributing Agency is assuming responsibility for notifying school districts of commercial recalls. If not, the School Nutrition Director and/or bookkeeper need to sign up to receive food safety alerts from [www.FoodSafety.gov/recalls](http://www.FoodSafety.gov/recalls).**

- **The School Nutrition Director needs to arrange for the school district's distributors to notify them in case of a recall of commercial items.**
- **The school district must be able to track foods during critical tracking events to know when the product has been received, used, served, stored or discarded, shipped, or used as a leftover.**
- **Need to include information on how the affected foods will be collected or destroyed.**

## Lesson 5: Reporting Complaints about USDA Foods

### Notes and Activity Sheet

Directions: Complete the following statements.

1. Two reasons why a complaint might be reported regarding a USDA Food provided to the school nutrition program are:
  - 
  -
2. Schools should report complaints about USDA Foods served by the school nutrition program to the \_\_\_\_\_  
\_\_\_\_\_.
3. Complaints should include as much \_\_\_\_\_ as possible.
4. Include the following information with a complaint being filed:
  - 
  - 
  - 
  - 
  - 
  - 
  - 
  - 
  - 
  - 
  - 
  - 
  - 
  - 
  -

- 
5. \_\_\_\_\_ can also be submitted with the complaint.
  6. While the complaint about the USDA Food is being processed, the following items should be retained:
    - 
    - 
    -
  7. Confer with \_\_\_\_\_ to determine if the food should be kept refrigerated or frozen.
  8. Describe how you would handle the following complaints.
    - Pinto beans are too hard.
  
    - Applesauce is pink.
  
    - Screw was found in tomato paste.

## Lesson 5: Reporting Complaints about USDA Foods

### Notes and Activity Sheet ANSWER KEY

Directions: Complete the following statements.

1. Two reasons why a complaint might be reported regarding a USDA Food provided to the school nutrition program are:
  - **Food Safety**
  - **Quality**
2. Schools should report complaints about USDA Foods served by the school nutrition program to the State Distributing Agency.
3. Complaints should include as much detail as possible.
4. Include the following information with a complaint being filed:
  - **Product Name and Number**
  - **Description of the problem**
  - **Date your agency received the product**
  - **Quantity of product involved**
  - **Quantity and physical address of product remaining**
  - **Purchase Order Number**
  - **Sales Order Number, including Sales Order Line Item Number**
  - **Advance Shipping Notification Number**
  - **Any lot numbers or can codes printed on the packaging**
  - **Establishment number of the plant processing any meat, poultry, or egg product**
  - **Your name, address, and phone number**

- **If complaint comes from someone else, report their name and contact information**
  - **Report of any illness or injury(ask if a doctor was seen, or if the health department conducted an investigation)**
  - **Photograph of foreign object or problem**
  - **Measurements of the foreign object**
5.       **Photographs**       can also be submitted with the complaint.
  6. While the complaint about the USDA Food is being processed, the following items should be retained:
    - **Original container or packaging**
    - **Foreign object**
    - **Any uneaten portion of the food**
  7. Confer with       **State**             **Distributing**             **Agency**       to determine if the food should be kept refrigerated or frozen.
  8. Describe how you would handle the following complaints.
    - Pinto beans are too hard.
  
  
  
  
  
  
  
  
  
  
  
  
  
  
    - Applesauce is pink.
  
  
  
  
  
  
  
  
  
  
  
  
  
  
    - Screw was found in tomato paste.

## Lesson 6: Inventory Management

### Notes and Activity Sheet

Directions: Complete the following statements.

1. The only way to have information readily available during a recall of USDA Foods is to have an effective \_\_\_\_\_.
2. An inventory management system must be in place at the RA and SDA levels to know:
  - 
  - 
  - 
  -
3. Contracted storage facilities must \_\_\_\_\_ USDA Foods from commercially purchased foods in order to comply with Federal regulations.
4. An SFA or school site can use a \_\_\_\_\_ system where USDA Foods and commercially purchased foods are stored and inventoried together.
5. In order to determine which products are affected by a recall of USDA Foods when a single inventory management system is in place, the SFA would need to use the \_\_\_\_\_ information that was provided during the recall.
6. During a recall of USDA Foods, it would not be wise to dispose of all of a specific product in inventory when the purchased product was intermingled with the USDA product because \_\_\_\_\_.
7. Critical tracking events at the school site include:
  - 
  - 
  - 
  - 
  -

- 
8. The following records and documents need to be kept by the RAs, the SDAs, the processors, the distributors, and the storage facility operators:
- - 
  - 
  -
9. USDA requires that food recall records be retained for \_\_\_\_\_ years following the end of the Federal fiscal year on September 30<sup>th</sup>.
10. Records may need to be kept \_\_\_\_\_ if a \_\_\_\_\_ claim has not been resolved.



## Lesson 6: Inventory Management

### Notes and Activity Sheet ANSWER KEY

Directions: Complete the following statements.

1. The only way to have information readily available during a recall of USDA Foods is to have an effective inventory management system.
2. An inventory management system must be in place at the RA and SDA levels to know:
  - **What food is in inventory**
  - **When it was received**
  - **Where it is stored**
  - **When and where it was distributed**
3. Contracted storage facilities must separate USDA Foods from commercially purchased foods in order to comply with Federal regulations.
4. An SFA or school site can use a single inventory management system where USDA Foods and commercially purchased foods are stored and inventoried together.
5. In order to determine which products are affected by a recall of USDA Foods when a single inventory management system is in place, the SFA would need to use the specific product identification information that was provided during the recall.
6. During a recall of USDA Foods, it would not be wise to dispose of all of a specific product in inventory when the purchased product was intermingled with the USDA product, because the SFA will only be reimbursed for the USDA Foods involved in the recall.
7. Critical tracking events at the school site include:
  - **When the product is received**
  - **When the product is used in production**
  - **When the product is served, stored, and/or thrown out**
  - **When a leftover is reheated**
  - **When a leftover is served and/or thrown out**

- **When a product is shipped to another location**
8. The following records and documents need to be kept by the RAs, the SDAs, the processors, the distributors, and the storage facility operators:
    - **Inventory**
    - **Distribution**
    - **Storage**
    - **Disposal**
  9. USDA requires that food recall records be retained for three years following the end of the Federal fiscal year on September 30<sup>th</sup>.
  10. Records may need to be kept longer if a reimbursement claim has not been resolved.

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

### Notes and Activity Sheet

Directions: Complete the following statements.

1. \_\_\_\_\_ of recalled USDA Foods involves purposely adulterating the item to render it useless or inedible.
2. \_\_\_\_\_ refers to the process of discarding the recalled item.
3. The management of solid waste is under the jurisdiction of the \_\_\_\_\_ and \_\_\_\_\_ governments. Information on proper methods of disposal must be obtained from agencies responsible for \_\_\_\_\_ and/or solid waste management regulations.
4. \_\_\_\_\_ for programs related to solid waste disposal can be obtained at [www.epa.gov/epawaste/wyl/stateprograms.htm](http://www.epa.gov/epawaste/wyl/stateprograms.htm).
5. \_\_\_\_\_ of \_\_\_\_\_ is often required to provide \_\_\_\_\_ to the manufacturer or to establish the need for product replacement or cost reimbursement.
6. The sample form provided by USDA to use for verification of destruction of recalled USDA Foods has a place for two \_\_\_\_\_ to sign that they \_\_\_\_\_ the destruction of the food.

Directions: Create an outline of topics to teach a new co-worker about the destruction and disposal of recalled USDA Foods.

<b>What I Would Say</b>	<b>What I Would Do</b>

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

### Notes and Activity Sheet ANSWER KEY

Directions: Complete the following statements.

1. **Destruction** \_\_\_\_\_ of recalled USDA Foods involves purposely adulterating the item to render it useless, or inedible.
2. **Disposal** \_\_\_\_\_ refers to the process of discarding the recalled item.
3. The management of solid waste is under the jurisdiction of the **State** \_\_\_\_\_ and **local** \_\_\_\_\_ governments. Information on proper methods of disposal must be obtained from agencies responsible for **environmental** \_\_\_\_\_ **protection** \_\_\_\_\_ and/or solid waste management regulations.
4. **State** \_\_\_\_\_ **contacts** \_\_\_\_\_ for programs related to solid waste disposal can be obtained at [www.epa.gov/epawaste/wyl/stateprograms.htm](http://www.epa.gov/epawaste/wyl/stateprograms.htm).
5. **Verification** \_\_\_\_\_ of **destruction** \_\_\_\_\_ is often required to provide **accountability** \_\_\_\_\_ to the manufacturer, or to establish the need for product replacement or cost reimbursement.
6. The sample form provided by USDA to use for verification of destruction of recalled USDA Foods has a place for two **witnesses** \_\_\_\_\_ to sign that they **observed** \_\_\_\_\_ the destruction of the food.

Directions: Create an outline of topics to teach a new co-worker about the destruction and disposal of recalled USDA Foods.

What I Would Say	What I Would Do
<p><b>A. USDA will provide guidance on how to handle the recalled USDA Foods</b></p> <p><b>B. Definitions</b></p> <ul style="list-style-type: none"> <li>a. Destruction</li> <li>b. Disposal</li> <li>c. Examples of each</li> </ul> <p><b>C. Solid waste disposal</b></p> <ul style="list-style-type: none"> <li>a. Regulated by local and State government</li> <li>b. Manager or director will get instructions from State contact for solid waste disposal</li> </ul> <p><b>D. Verification of destruction</b></p> <ul style="list-style-type: none"> <li>a. Rationale for form</li> <li>b. Use of form</li> <li>c. Need for witnesses</li> </ul>	<p><b>A. Show employee printed copy of RAS notification from WBSCM</b></p> <p><b>B. Share personal experiences about recalls during years of experience</b></p> <p><b>C. Show employee form and tell them where the form is kept</b></p>

## **Lesson 7: Household Products Activity**

Directions: Relate the items in the list of household items to topic of food destruction and disposal during a recall of USDA Foods as described in this resource.

### **Household Items**

Chef's Knife

Calculator

Bleach

Camera

Aluminum Foil

Flashlight

Duct Tape

Pencil Sharpener

## **Lesson 7: Household Products Activity ANSWER KEY**

Directions: Relate the items in the list of household items to topic of food destruction and disposal during a recall of USDA Foods as described in this resource.

Note: The answers below are one possible answer. Other answers may also be correct.

### **Household Items**

**Chef's Knife – can be used to chop food into smaller pieces so that it can be destroyed.**

**Calculator – can be used to calculate the value of the foods being destroyed.**

**Bleach – can be used to destroy the recalled foods.**

**Camera – can be used to document the destruction of the recalled foods.**

**Aluminum Foil – can be used to separate a portion of food or for storage of a food that is not being recalled.**

**Flashlight – can be used if light is out in the freezer or cooler.**

**Duct Tape – can be used to label boxes not to be used.**

**Pencil Sharpener – can be used to sharpen pencils so that temperatures can be recorded.**



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

Name of State Agency \_\_\_\_\_

Name of Recipient Agency \_\_\_\_\_

Commodity	# of Cases Destroyed	Contract #	Destruction Method

Witnesses	Print Name	Signature	Date Destruction Observed
<b>Witness 1</b>			
<b>Witness 2</b>			

School District Contact Information:

Name and Title \_\_\_\_\_

Address \_\_\_\_\_

Phone Number \_\_\_\_\_

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

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

## Lesson 7: Destruction and Disposal of Recalled USDA Foods

### Case Study

Directions: Read the Case Study and answer the questions at the end of the study.

Frozen strawberries were recalled due to *E. coli* contamination. The USDA determined that USDA Foods (strawberries distributed by USDA FNS) were affected. Ann Thomas was the manager at Monroe High School. Her school had isolated the product and labeled the strawberries so that they would not be used. It was nearing time for schools to dismiss for the summer. Ann did not know if the distributors were going to pick up the product or if the product should be destroyed or disposed of. Since freezer space was going to be limited during the summer, Ann decided to discard the product by instructing her staff to place the five gallon buckets of frozen strawberries in the garbage dumpster.

- A. Did Ann follow the procedures for destruction of the USDA Foods?
- B. Did Ann follow the procedures for the disposal of USDA Foods?
- C. What problems might be anticipated since Ann proceeded to get rid of the strawberries before USDA had provided instructions for their destruction and disposal?

## Lesson 7: Destruction and Disposal of Recalled USDA Foods

### Case Study ANSWER KEY

Directions: Read the Case Study and answer the questions at the end of the study.

Frozen strawberries were recalled due to *E. coli* contamination. The USDA determined that USDA Foods (strawberries distributed by USDA FNS) were affected. Ann Thomas was the manager at Monroe High School. Her school had isolated the product and labeled the strawberries so that they would not be used. It was nearing time for schools to dismiss for the summer. Ann did not know if the distributors were going to pick up the product or if the product should be destroyed or disposed of. Since freezer space was going to be limited during the summer, Ann decided to discard the product by instructing her staff to place the five gallon buckets of frozen strawberries in the garbage dumpster.

1. Did Ann follow the procedures for destruction of the USDA Foods?

**Answer: No. Ann is only discarding the strawberries. They have not been destroyed. When she places the containers in the garbage dumpster there is a danger that they still might be consumed by someone.**

2. Did Ann follow the procedures for the disposal of USDA Foods?

**Answer: No**

3. What problems might be anticipated since Ann proceeded to get rid of the strawberries before USDA had provided instructions for their destruction and disposal?

**Answer: Her school most likely will not be reimbursed for the recalled strawberries. She will also not have any verification documentation that the strawberries were destroyed and discarded.**

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

### Notes and Activity Sheet

Directions: Complete the following statements.

1. Reimbursable costs for USDA Foods are limited to:
  - 
  - 
  - 
  -
2. No two \_\_\_\_\_ are alike.
3. The \_\_\_\_\_ must work closely with USDA to determine \_\_\_\_\_ costs for reimbursement.
4. When USDA Foods are recalled, in most cases, the \_\_\_\_\_ is responsible for replacing the affected product and reimbursing Federal, State, and local agencies for allowable costs incurred with the cost of the recall.
5. The SDAs should submit \_\_\_\_\_ with their reimbursement request.
6. When the bulk USDA Food product delivered to the processor is safe but the end product is determined to be a health risk, the recall will be treated as a \_\_\_\_\_ recall.
7. In order to begin the accounting process, the RAs must send \_\_\_\_\_ and a \_\_\_\_\_ to the \_\_\_\_\_.
8. Reimbursable expenses may include:
  - 
  - 
  -

9. \_\_\_\_\_ expenses include, but are not limited to:
- Storage at school level;
  - Overtime compensation for employees involved in the recall;
  - Long-distance telephone calls and other associated business expenses;  
and
  - Reimbursement for commercially purchased food used in place of the product.
10. Only \_\_\_\_\_ payment is issued per State.
11. SDAs report data through the \_\_\_\_\_ system on the amount of recalled food that is
- Served;
  - Held or returned to vendor;
  - Re-donated;
  - Destroyed; and/or
  - Unaccounted for.
12. Signed \_\_\_\_\_ forms must be submitted by the SDA to the \_\_\_\_\_ . After the FNS Regional Office reviews the documentation for completeness, it is submitted to the FNS National Office. The FNS National Office forwards the information to the \_\_\_\_\_ which is responsible for \_\_\_\_\_ the expenses.
13. The \_\_\_\_\_ receives the payment and reimburses the \_\_\_\_\_ for specific costs.
14. The Food Distribution Division at the FNS National Office is responsible for coordination of \_\_\_\_\_ of product or providing \_\_\_\_\_ based on amounts reported by the SDA.

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

### Notes and Activity Sheet ANSWER KEY

Directions: Complete the following statements.

1. Reimbursable costs for USDA Foods are limited to:
  - **Storage**
  - **Transportation**
  - **Processing**
  - **Distribution**
2. No two recalls are alike.
3. The SDA must work closely with USDA to determine allowable costs for reimbursement.
4. 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 with the cost of the recall.
5. The SDAs should submit copies of paid processor bills or invoices with their reimbursement request.
6. When the bulk USDA Food product delivered to the processor is safe but the end product is determined to be a health risk, the recall will be treated as a commercial recall.
7. In order to begin the accounting process, the RAs must send original receipts and a request for reimbursement to the SDA.
8. Reimbursable expenses may include:
  - **Delivery fees**
  - **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 SDA**
  - **Processing fees**
  - **Destruction costs (bleach, plastic garbage bags, dump fees, transportation to disposal site, and/or landfill charges)**

9. Non-reimbursable expenses include, but are not limited to:
- Storage at school level
  - Overtime compensation for employees involved in the recall
  - Long-distance telephone calls and other associated business expenses
  - Reimbursement for commercially purchased food used in place of the product
10. Only one payment is issued per State.
11. SDAs report data through the WBSCM system on the amount of recalled food that is
- Served;
  - Held or returned to vendor;
  - Re-donated;
  - Destroyed; and/or
  - Unaccounted for.
12. Signed destruction forms must be submitted by the SDA to the FNS Regional Office. After the FNS Regional Office reviews the documentation for completeness, it is submitted to the FNS National Office. The FNS National Office forwards the information to the AMS which is responsible for approving the expenses.
13. The SDA receives the payment and reimburses the RAs for specific costs.
14. The Food Distribution Division at the FNS National Office is responsible for coordination of replacement of product or providing entitlement credit based on amounts reported by the SDA.

## Procedures for Reimbursement of Processing Costs Following a Recall of USDA Foods Handout

<b>Type of USDA Foods Being Recalled</b>	<b>Instructions</b>			
	<b>USDA</b>	<b>USDA Foods Vendor</b>	<b>Processor</b>	<b>SDA</b>
USDA Foods Delivered as Purchased to SDA	May initiate action to replace product and reimburse SDA/RAs if vendor defaults or delays compensation	Assumes responsibility for replacement and costs incurred		
Processed USDA Foods Delivered to SDA/RA				
Bulk/Raw Product with No Substitution	May initiate action to replace product and reimburse SDA/RAs if vendor defaults or delays compensation	Is responsible for all costs incurred by USDA, SDAs and/or RAs		Submit copies of paid processor bills, or invoices, with reimbursement request
Bulk Product with Substitution= Commercial Recall	Will seek reimbursement for costs of implicated USDA Foods			
Bulk USDA Foods are Safe but Problem at Processing Plant = Commercial Recall	Assumes no responsibility for costs		Assumes responsibility for all costs	



## **Lesson 8: Toolbox Activity**

Directions: During this course, you should have assembled a toolbox of materials that you can use to plan for and respond to a recall of USDA Foods. List the most important facts, ideas, and/or references that you want to remember in the space provided below. You may wish to color code items with markers or colored pencils. File this sheet with your materials on responding to a recall of USDA Foods.

## **Lesson 8: Toolbox Activity ANSWER KEY**

Directions: During this course, you should have assembled a toolbox of materials that you can use to plan for and respond to a recall of USDA Foods. List the most important facts, ideas and/or references that you want to remember in the space provided below. You may wish to color code items with markers or colored pencils. File this sheet with your materials on responding to a recall of USDA Foods.

Note: The answers listed for this activity will vary for each individual. The answer key lists some possible suggestions.

*Responding to a Food Recall: Procedures for Recalls of USDA Foods* available from [www.nfsmi.org](http://www.nfsmi.org).

Course workbook for online course *Responding to a Food Recall of USDA Foods*

Food Recall Classes Chart

[www.FoodSafety.gov/recalls](http://www.FoodSafety.gov/recalls) website

Functions of Federal Agencies Answer Key

Fact Sheets

*Inventory Management and Tracking Reference Guide*

USDA/NFSMI

## Fact Sheet: General Steps in a Recall of USDA Foods

1. After working with the manufacturer of the recalled product, the regulatory agency (the Food Safety Inspection Service (FSIS) or the Food and Drug Administration (FDA)) issues a press release about the food recall.
2. The Food and Nutrition Service (FNS) confers with the regulatory agency and the procurement agency (the Agricultural Marketing Service (AMS) or the Farm Service Agency (FSA)), depending on the food recalled, to determine:
  - Whether any USDA Foods are involved, and
  - Purchase information for the affected products when USDA Foods are involved in the recall.
3. FNS uses the Rapid Alert System (RAS) in the Web-Based Supply Chain Management (WBSCM) system to notify State Distributing Agencies (SDAs), which may also be known as State Agencies, that received affected USDA Foods. Notices:
  - Are sent within 24 hours of the recall, and
  - Include the recall notice, press release, and product identification information needed to track the product.
4. FNS contacts all processors that received bulk USDA Foods for further processing directly from the USDA and alerts them to the recall.
  - Notices are sent within 24 hours of the recall.
  - Only the processor knows where end products are in the distribution system. The processor is responsible for notifying all customers who purchased end products containing the recalled food, and should do so within 24 hours of receiving the recall notification.

5. SDAs must notify all Recipient Agencies (RAs), in-State processors, and State contracted distributors that received the recalled USDA Foods within 24 hours of receiving the recall notification from FNS.
  - SDAs initiate their own communication to RAs using USDA SENS, or another communication tool.
  - SDAs must contact RAs because FNS order and delivery records track USDA Foods only to the SDA.
  
6. RAs must immediately notify all entities that received recalled USDA Foods directly from them, ideally within 24 hours of receiving the recall notification. This includes:
  - serving sites, such as individual schools,
  - another agency receiving transferred food,
  - further processors receiving redirected product, and
  - contracted distributors.
  
7. Immediately upon receiving notification of the recall, RAs must:
  - Isolate and label the recalled product so that it is not used.
  - 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.

- Return inventory information to SDAs as soon as possible, ideally in 48 hours or less.
8. SDAs compile inventory information from all entities – RAs, processors, and State contracted distributors – and report it to FNS in accordance with FNS instructions. Inventory information is used by the USDA for reimbursement of eligible costs associated with the recall.

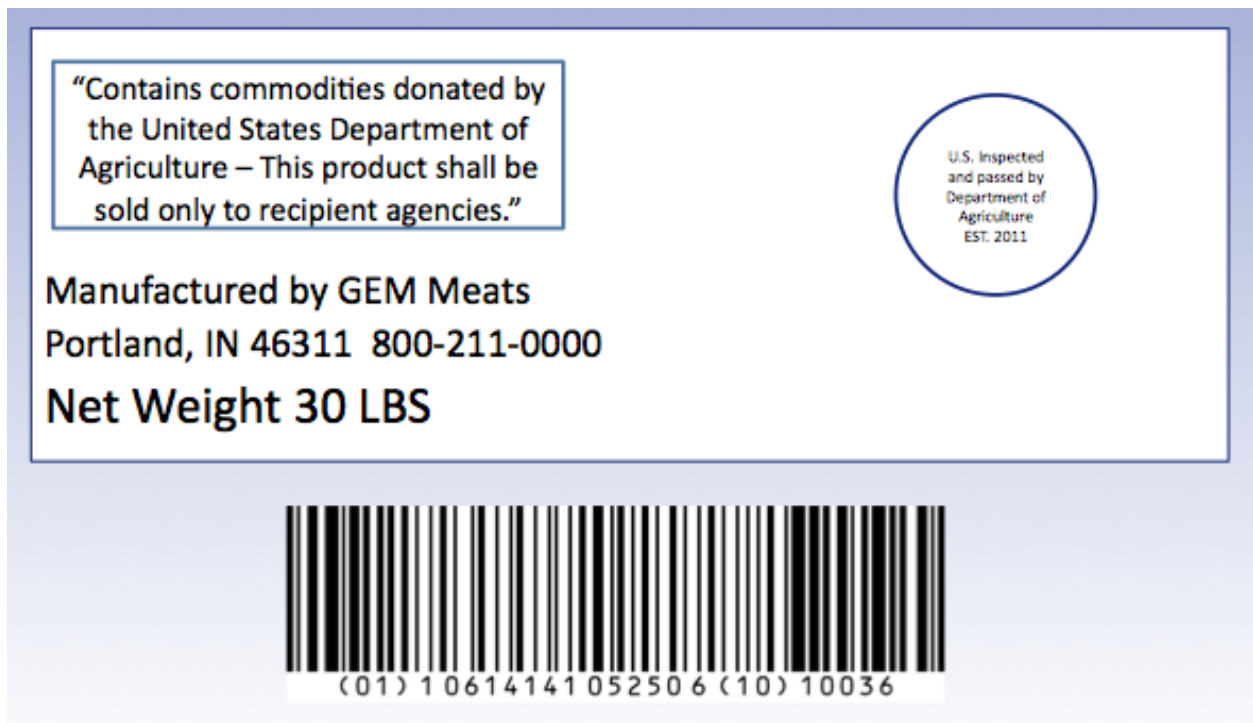
## **Fact Sheet: How to Identify Products Involved in a Recall of USDA Foods**

At the time of a recall, specific product identification information must be provided by the manufacturer so that the recalled food can be identified accurately. The USDA Food and Nutrition Service (FNS) send notifications of recalls of USDA Foods to States through the Rapid Alert System (RAS) in the Web-Based Supply Chain Management System (WBSCM). These notifications include product identification information. States are then responsible for disseminating this information to their Recipient Agencies. It is important to incorporate food product tracking into standard inventory management practices.

### **Specific product information may include the following:**

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

Example: Frozen Beef Patty Mix –USDA Food



- A. Product Brand
- B. Packer/Manufacturer
- C. Manufacturer's Product Code
- D. Preparation Identifier
- E. Product Name
- F. Ingredients Statement for Prepared Products
- G. Pack Size
- H. Storage Information
- I. Bar Code for Warehouse and Inventory Identification

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

## **Fact Sheet: How to Report a Complaint about USDA Foods**

### **Rationale for Reporting a Complaint**

It is important to have a good feedback system in order to respond quickly to food safety concerns and improve product quality.

### **Types of Complaints**

Complaints may address a food safety concern, or a quality issue.

### **Where to Report a Complaint**

Report complaints about USDA Foods to your State Distributing Agency (SDA), which may also be known as the State Agency. The SDA will, in turn, report complaints to the USDA Food and Nutrition Service (FNS) through the Web-Based Supply Chain Management (WBSCM) system.

### **How to Report a Complaint**

Provide as much detail as possible to your SDA. Information to be provided includes:

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



- Photograph of foreign object or problem
- Measurements of the foreign object

### **What to Do While the Complaint is Being Processed**

If a school or School Food Authority is aware that a complaint is being reported about USDA Foods available through their School Nutrition Program, they should retain the following items, until further directed by the SDA:

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

## Fact Sheet: Reimbursement Process for Recalled USDA Foods

Q.: What expenses are reimbursable and non-reimbursable?

Reimbursable Expenses	Non-reimbursable Expenses
<ul style="list-style-type: none"><li>• Delivery fees</li><li>• Storage fees</li><li>• Processing fees</li><li>• Destruction costs</li></ul>	<ul style="list-style-type: none"><li>• Storage at school level</li><li>• Overtime compensation for employees in conducting the recall</li><li>• Long-distance telephone calls and associated administrative expenses</li><li>• Reimbursement for commercially purchased food used in place of the recalled product</li></ul>

Q.: What are general steps in the reimbursement process for recalled USDA Foods?

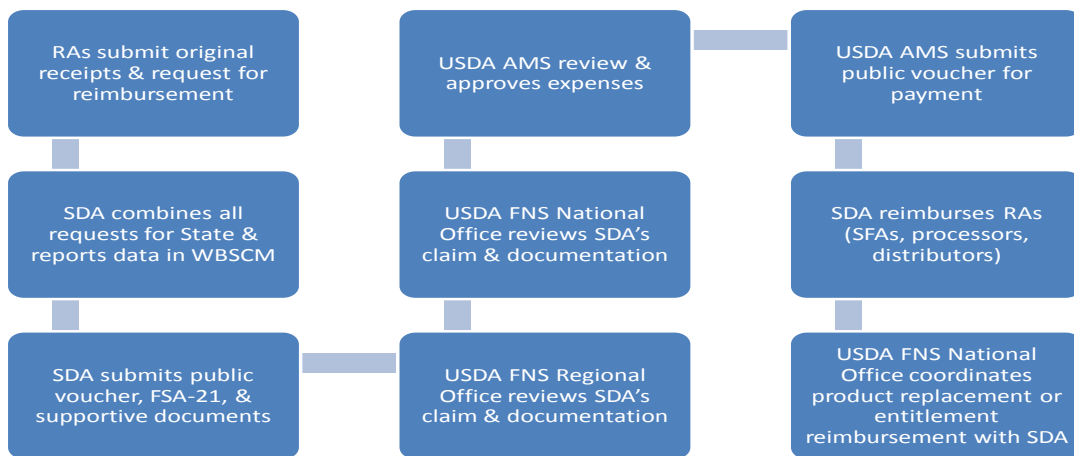
A.: Each recall is complex and reimbursement procedures may vary slightly for each recall. The general reimbursement process is below.

1. Recipient Agencies (RAs) send original receipts/invoices, and a request for reimbursement to the State Distributing Agency (SDA), which may also be known as the State Agency.
2. The SDA combines all individual RA reimbursement requests into one public voucher (the 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 the Web-Based Supply Chain Management system (WBSCM) on the amount of recalled food:
    - served
    - held or returned to vendor
    - re-donated
    - destroyed
    - unaccounted for
  - b. SDAs will be advised as to any cost reimbursement that will be allowed for processing. In situations where a State has not paid a processor, but the processor has incurred processing expenses, the SDA must work closely with the USDA and the processor to come to an acceptable solution.
3. The SDA submits the public voucher (FSA-21), all supporting original receipts/invoices, and signed destruction forms to the USDA Food and Nutrition Service (FNS) Regional Office. 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 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 USDA Agricultural Marketing Service (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.
8. Upon receipt of payment from the USDA, the SDA reimburses its component RAs (e.g., School Food Authorities (SFAs), distributors, warehouses, and processors) for their specific costs. The USDA cannot make payments directly to processors – only to an SDA who in turn can 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.

## General Steps in Reimbursement



The above illustration outlines general procedures for reimbursement of costs incurred by SDAs and RAs following a recall of USDA Foods. Remember, each recall is complex and reimbursement procedures may vary slightly for each recall.

## GLOSSARY

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

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

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

**Consignees** are the customers: (companies or organizations that have received a portion of the product);middleman or caretaker.

**Department of Defense (DOD).** United States Department of Defense procures some fresh produce used in school nutrition programs.

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

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

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

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

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

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

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

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

**Recipient Agencies (RAs).** Agencies authorized to receive USDA Foods for distribution to eligible recipients, for use in meals served to eligible recipients, or for distribution to other recipient agencies in accordance with an agreement with a State Distributing Agency. A School Food Authority is an example of a recipient agency.

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

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

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

**Single Inventory System.** USDA commodities are stored and inventoried together with purchased foods.

**USDA Foods.** Products purchased by agencies of USDA under the surplus removal program to provide price support for agricultural commodities. These products are distributed to States for further distribution to eligible recipient agencies, including schools.

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

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

## Acronyms List

Acronym	Definition
AMS	Agricultural Marketing Service
DHHS	Department of Health and Human Services
DOD	Department of Defense
FDA	Food and Drug Administration
FNS	Food and Nutrition Service
FSA	Farm Service Agency of USDA
FSIS	Food Safety and Inspection Service
NFSMI	National Food Service Management Institute
NO	National Office
NPA	National Processing Agreement
RA	Recipient Agency
RAS	Rapid Alert System
RCRA	Resource Conservation and Recovery Act
SDA	State Distributing Agency
SENS	State Emergency Notification System
SFA	School Food Authority
SOP	Standard Operating Procedure
USDA	United States Department of Agriculture
WBSCM	Web Based Supply Chain Management (System)



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## Four-hour Course Assessment

1. A food recall is:
  - a. A voluntary action by the manufacturer or distributor to remove a food from the market
  - b. Usually initiated by the food broker
  - c. Required by the Department of Health and Human Services
  - d. Never indicated unless there is a risk of death
  
2. A food recall of USDA Foods initiated to ensure the safety of the foods for students may include all of the following reasons EXCEPT:
  - a. The food is unsafe
  - b. The food is of poor quality
  - c. The food is mislabeled
  - d. The food is adulterated
  
3. Adulterated food is impure, unsafe or unwholesome in nature.
  - a. True
  - b. False
  
4. Which class of food recall would be most likely to pose a health risk to those students who consumed the food?
  - a. Class I
  - b. Class II
  - c. Class III
  - d. Unidentified Class
  
5. Pizza that has a label that has not been positioned correctly on the product's box is an example of a \_\_\_\_\_ food recall.
  - a. Class I
  - b. Class II
  - c. Class III
  - d. Unidentified Class
  
6. The two Federal agencies responsible for regulating the food supply are:
  - a. DOD and FSIS
  - b. FSIS and FDA
  - c. CDC and FDA
  - d. FSA and FDA
  
7. Recalls of USDA foods are almost always part of a bigger recall of commercial foods because USDA foods are produced by the same manufacturers that sell to the commercial market.
  - a. True
  - b. False

8. Put the following steps in the proper sequence by writing the number one in the step that must be performed first and continuing on until the number four is written in the space provided for the last step that occurs.
  - a. \_\_\_\_ FNS notifies the State agency by placing an announcement in the RAS on the Web-Based Supply Chain Management System.
  - b. \_\_\_\_ FNS determines if USDA Foods are included in the food recall.
  - c. \_\_\_\_ School isolates recalled products in accordance with instructions
  - d. \_\_\_\_ FNS researches specific product identification information so that the recalled food product can be identified properly.
  
9. The web site to sign up to receive food safety recall alerts is [www.safefood.com](http://www.safefood.com).
  - a. True
  - b. False
  
10. Processors may substitute USDA Foods with like quantities of domestically produced, commercially purchased product if the quality is equal to or better than the USDA product received.
  - a. True
  - b. False
  
11. Which agency is responsible for notifying the recipient agencies, such as local school systems, about food recalls?
  - a. State Distributing Agency
  - b. Food manufacturer
  - c. USDA FNS
  - d. In-State processor
  
12. All of the following information should be included in a complaint about USDA Foods provided to school nutrition programs EXCEPT:
  - a. Product name and number
  - b. Date your school received the product
  - c. Quantity of product involved
  - d. Date the product was scheduled to be used
  
13. When a complaint is filed about a USDA food served by the School Nutrition Program, all of the following items should be retained EXCEPT:
  - a. Sample tray that was served
  - b. Original packaging or container
  - c. Foreign object present in the food
  - d. Any uneaten portions of the food
  
14. An effective inventory management system will help you during a recall of USDA Foods in all of the following ways EXCEPT:
  - a. Identify what foods are in inventory
  - b. Describe the product specifications used when purchasing the product
  - c. Identify where the product is stored
  - d. Identify when the product was received

15. Records that must be kept by RAs, SDAs, processors, distributors, and storage facility operators for use during a recall of USDA Foods include all of the following EXCEPT:
  - a. Amounts of product in inventory
  - b. Amounts of product distributed to other sites
  - c. Amounts of products that are needed for the next month of production
  - d. Amounts of products that have been used in production
  
16. USDA requires that records be retained for:
  - a. 1 month
  - b. 1 school year
  - c. 2 fiscal years
  - d. 3 years following the end of the Federal fiscal year
  
17. Purposely adulterating the recalled food to make it inedible is:
  - a. Destruction of the food
  - b. A wasteful practice discouraged by USDA
  - c. The same as redirecting the USDA Foods
  - d. An alternative to isolating the recalled product
  
18. Guidance on what to do with the recalled product are provided to the SDA by:
  - a. FDA
  - b. FNS USDA
  - c. The distributor
  - d. The manufacturer
  
19. Directions for disposal of the recalled food must be obtained from:
  - a. FDA
  - b. State and local agencies responsible for environmental protection
  - c. The food manufacturer
  - d. The local wellness committee
  
20. Reimbursable costs associated with the removal of USDA Commodity Foods include costs for:
  - a. Storage, transportation, processing and distribution
  - b. Storage and transportation only
  - c. Handling the paperwork and records required
  - d. Landfill charges only

## Four-hour Course Assessment ANSWER KEY

1. A food recall is:
  - a. **A voluntary action by the manufacturer or distributor to remove a food from the market**
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