



**United States
Department of
Agriculture**

Food and
Nutrition
Service

3101 Park
Center Drive
Alexandria, VA
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DATE: January 10, 2005

SUBJECT: Hazard Analysis and Critical Control Point (HACCP) in Schools
Reauthorization 2004: Implementation Memo – SP 11

TO: Special Nutrition Programs
All Regions

State Agencies
Child Nutrition Programs
All States

Section 111 of the Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265) amended section 9(h) of the Richard B. Russell National School Lunch Act by requiring school food authorities (SFAs) to implement a food safety program. The Reauthorization Act requires that, during the preparation and service of meals, the SFA comply with a HACCP system established by the Secretary of Agriculture. The law requires compliance with this requirement by July 1, 2005.

We are aware that schools are eager to develop their implementation plans and would like to receive guidance as soon as possible. We are working with staff from the FNS Food Safety Unit, the Food Safety Inspection Service, and the Food and Drug Administration to develop correct and practical HACCP guidance. We are also organizing a workgroup with State and local education officials, along with officials from agriculture and health agencies who have HACCP knowledge and experience. This workgroup will help us develop HACCP guidance that is in line with local SFA capabilities and needs.

We recognize that many SFAs participating in the school meal programs already follow food safety procedures and will do their best to implement HACCP in a timely fashion. We plan to have HACCP guidance available in spring 2005 and envision that SFAs will be in the process of implementing HACCP by the beginning of SY 2005-2006. We are asking State agencies to inform their SFAs about the HACCP requirement and that the USDA will be providing implementation guidance.

State agencies that have questions about the HACCP requirement should contact their Regional Office for assistance.

A handwritten signature in black ink, appearing to read "Stanley C. Garnett".

STANLEY C. GARNETT
Director
Child Nutrition Division