

Responding to a Food Recall

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Introduction

Purpose

Responding to a Food Recall is designed for foodservice directors and managers to reference when:

- A food recall notice for a USDA commodity food is issued through USDA/FNS, or
- A food recall notice is issued for a purchased food by the manufacturer or responsible government entity.

How to Use *Responding to a Food Recall*

This resource can be used as a reference and as a training manual.

1. **As a reference for end users of food products (foodservice directors and managers)**

Foodservice district directors and managers can use this reference anytime there are questions regarding food recalls. The background materials and step-by-step instructions provide information on

- Reasons for food recalls;
- Roles of the manufacturer, the distributor, and various government agencies that handle food recalls; and
- Roles of foodservice district directors and (school site) managers in following procedures to respond to a food recall.

2. **As a Leader Guide**

The *Leader Guide* is an outline describing how to use *Responding to a Food Recall* to present a two-hour training session. A State agency staff member, a school district director, or an instructor familiar with school nutrition program management may conduct the training session.

Commonly Used Acronyms

DHHS	U.S. Department of Health and Human Services
FDA	Food and Drug Administration (an agency of the U.S. Department of Health and Human Services, DHHS)
FNS	Food and Nutrition Service (an agency of USDA responsible for administering the National School Lunch Program; School Breakfast Program; Summer Food Service Program; Child and Adult Care Food Program; Food Stamp Program; Food Distribution Program; and Women, Infants, and Children Program)
FSIS	Food Safety and Inspection Service (USDA)
NFSMI	National Food Service Management Institute
OPHS	Office of Public Health and Safety (DHHS)
SFA	School Food Authority
USDA	United States Department of Agriculture

Definitions

Hold - A time period used for investigation after a USDA commodity food has been identified as potentially unsafe. The hold time for commodity foods is no longer than 10 days. *The hold process is unique to USDA commodity foods.*

Physical segregation - The process of removing a food product to a separate area of storage that will spatially isolate it from other foods.

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

Release - Issued by USDA when the product on hold has been found safe and can be used.

School district - One or more schools that operate as a single administrative body with a designated School Food Authority.

The Commodity Hold and Recall Team (CHART)

In 1999, a group of representatives from the United States Department of Agriculture (USDA), the Food and Drug Administration (FDA), State Distributing Agencies, and local school districts began meeting to discuss changes needed in the process for handling USDA commodity food recalls. This group, known as the Commodity Hold and Recall Team (CHART), identified the following three objectives for a redesigned process to address concerns related to handling holds and recalls of USDA commodity foods:

- Provide accurate and timely communication to schools regarding a food recall.
- Ensure that unsafe commodity products are removed from sites in an expedient, effective, and efficient manner.
- Streamline the process for reimbursement for recalled USDA commodity food(s).

A new process for recalls was developed to address safety concerns of USDA commodity foods. Much of this process also applies to recalls for food quality. A copy of the process is included in Appendix 1, “Commodity Hold and Recall Process.”

As agencies that receive USDA commodity foods, school districts play a vital role in assuring the final disposition of the commodity product identified when a recall notice is issued. Since they are at the end of the distribution chain for food products, school districts are responsible for identifying the recalled product, removing it from possible use, and thereby assuring the safety of customers.

Training is important because all foodservice personnel need to be aware of how to handle food recalls. The school foodservice director or other designated person is responsible for coordinating food safety, but all staff members must follow the standard operating procedures for the recall to be handled correctly. It is important to carefully follow the guidance in a food recall notice to protect the health of the general public.

The Food Recall Process Explained

A food recall is an action by a manufacturer or distributor to remove a product from the market. Recalls are initiated for two purposes:

1. Removal to protect the public from products that may cause health problems or possible death.
2. Removal of a mislabeled product (false or misleading labeling and/or packaging).

Notification of a Food Recall

A food recall may involve a USDA commodity food or a commercially produced food. The recall process is similar for both. However, notification is handled differently for commodity foods and purchased foods.

In the following explanation of the food recall process, additional information specific to USDA commodity foods is shown in the boxes. The type of food product determines the agency responsible for the food product. For more information on hold and recall products and the responsibilities of government agencies in food recalls see Appendix 2, "Frequently Asked Questions."

Food Recall for a Commodity Food

USDA/FNS notifies the State Distributing Agency regarding a recall for a USDA commodity food; then the State Distributing Agency notifies the school districts. The State Distributing Agency must contact the school districts within 24 hours after receiving notification from FNS. The State Distributing Agency will send the school districts

- A recall notification report,
- A press release, and
- All the information needed to track the food product and document reimbursable costs to the school district or schools affected by the recall.

The State Distributing Agency will also contact the distributor(s)/warehouse(s) with instructions to place the commodity food on hold. The distributor/warehouse will determine

- The amount of the recalled product still in storage at the State level, and
- The location and amount of product that has been delivered to school districts and schools.

For USDA commodity foods, “Hold” and “Release” is a process unique to USDA commodity foods.

- **Hold** - A time period used for investigation after a USDA commodity food has been identified as potentially unsafe. USDA commodity food products placed on hold should not be used until further notification is received. The school district is notified to “hold” a food product and not use it in production or service until a recall decision has been made. A hold is typically for a limited time until USDA or FDA can make a final decision.

The instructions to hold a product may come from the State Distributing Agency for a commodity food product or from the manufacturer’s press release for purchased food. Sometimes there is not enough information to make a final decision on whether the potentially unsafe product should be recalled. In this case, a hold is placed on the food product until further testing can be completed.

The usual maximum amount of time for a “hold” is 10 days. Food products that must be held for more than 10 days may be returned to the State Distributing Agency.

- **Release** - Foods that are placed on hold may be released for use or recalled at a later date. The USDA commodity food is released if it is found safe and can be used. In that situation, a “release” notice will be issued by the State Distributing Agency for a USDA commodity food.

USDA Recall Classifications

- Class I** Involves a health hazard situation where there is a reasonable probability that consuming the product will cause serious adverse health problems or death.
- Class II** Involves a health hazard situation where there is a remote probability of adverse health problems from consuming the product.
- Class III** Involves a situation where consuming the product will not cause adverse health problems.

Food Recall for a Purchased Food

- The food manufacturing company must provide a press release for public notification. The press release may appear in the newspaper, on the Internet, and/or be reported on television or radio.
- The school district may receive direct notification from the wholesaler through a facsimile, telephone call, or letter.
- Notification of the food recall may be provided by one or more State agencies such as the public health department or the agency that administers the Child Nutrition Program.

For additional information see Appendix 3, "Mock Recall Notification Report and Mock Recall (Press) Release."

Responsibilities of the School District and School for Food Recalls

Each school district, school site, or the State Distributing Agency may have specific procedures that must be followed when a food recall notice is received. To ensure customer safety, respond to all notices of food recall.

Follow the Food Recall Responsibilities shown below, along with the school district's standard operating procedure, to correctly respond to a food recall. The responsibilities have been divided into those at the administrative level of the school district and the site level (schools and other feeding sites). School districts with only one school are still responsible for both levels. For summary see Appendix 4, "The Food Recall Action Checklist."

Food Recall Responsibilities at the Administrative Level

1. Develop a standard operating procedure before receiving notification of a food recall.

A food recall requires immediate action because there is a limited time frame in which each task must occur to guard the safety of customers. Take action immediately when notice of a recall is received. Best practice is to have a standard operating procedure in place before a notification of a food recall.

The standard operating procedure includes an itemized list of steps to be taken, persons responsible for each step, and detailed procedures to be followed at each step. For the procedures to be effective, personnel must be trained to use the hold and recall process. Conducting a mock food recall will help reinforce these procedures. For more information see Appendix 5, "Sample Standard Operating Procedure for Food Recalls of USDA Commodity Food and Purchased Food," and Appendix 6, "Procedures for Conducting a Mock Food Recall in a School District."

For USDA commodity foods, a responsible person needs to be appointed to coordinate food safety; typically, the appointee is the foodservice district director. The name, title, e-mail address, phone and fax numbers for this person should be provided to the State Distributing Agency. It is helpful if both work and home phone numbers are provided. It is recommended that each school identify a back-up food safety coordinator.

2. Review the recall notification report when it is received.

- Determine the problem as stated in the recall,
- Review specific directions in the communication(s), and
- Determine actions that must be taken.

For USDA commodity foods, in the event of a food recall affected school districts will receive a recall notification report from the State Distributing Agency along with a press release and a request for information to be returned to them.

- The recall notification report will provide the name of the product, affected lot numbers, and other product information.
- Additional information will be provided by the State Distributing Agency to assist school districts in responding to requests from media, parents, school district officials, and others.
- The school district must provide the location and quantity of the identified food product in storage, the amount of product already consumed, and documentation for reimbursable costs.

3. Communicate information about the food recall immediately.

Communicate the information to the sites (schools, contract feeding sites, central kitchens) as quickly as possible in a manner that assures the information has been received and site managers/cooks understand their responsibilities. Use the following guidelines to assure the food product is removed quickly and help prevent any errors due to lost messages or misunderstanding.

- Speak directly to the person responsible to clarify any questions.
- Document telephone communication.
- Request confirmation of receipt of any information that is distributed by electronic communication (e-mail) or facsimile (fax).

For USDA commodity foods, the school district must immediately notify sites of the recall, identify the location of the affected products, verify that the food items bear the product identification codes, isolate the commodities to avoid accidental use, and take an accurate inventory by location.

4. Collect health-related information needed for public communications.

The seriousness of the health risk determines the classification of a recall. For information on a specific product recall contact the State agency or public health department. For Class I or Class II recalls document the following information:

- Whether any of the product was served, to which classes (groups of students and other customers),
- The date(s) served, and
- Any reports of possible health problems related to the recalled product including physical symptoms of illness and any actions taken.

5. Work closely with the school district's public communications contact person.

Notify the school district public communications contact person so that one person is prepared to handle public communications, including contact with health agencies, local media, and parents. Send the school district public communications contact person all information that you have that will help to communicate correct information to the public.

Provide the following information to the school district public communications contact person:

- Copies of the food recall notice;
- Press releases;
- Any additional information related to the recall;
- Information on whether the product has been used and served, including to whom and the date of service; and
- Reports of potential adverse health risks related to the recalled product.

The information communicated to the public will depend on the type of recall and whether or not any of the food product has been consumed. If the food product has been used and there is a potential adverse health risk that may have occurred or may occur, the persons affected should (ethically and legally) be notified. If there is no potential adverse health risk associated with serving the product or if the product has not been served, there is no reason to report the recall to the customer.

6. Locate the recalled food product.

- Identify whether any of the product was received in the school district,
- Identify the sites where the affected product is located, and
- Verify that the food product containers bear the product identification code(s) listed in the recall notice.

7. Count the inventory of the recalled food product.

For each site, obtain an accurate inventory count of the product in inventory and amount already used.

8. Account for all of the recalled food.

Verify inventory counts against records of foods received at the sites to assure that all food has been removed from potential use.

9. Segregate and secure the recalled food product.

Obtain confirmation from each site that the product has been segregated from other food products and secured so that it will not be used.

10. Take action to conform to the recall.

Step 1: Submit information to the manufacturer, distributor, or State agency describing the quantity of the product in stock and the storage site.

For USDA commodity foods, information regarding the quantity of the product in stock and the storage site where the commodity product is located must be submitted to the State Distributing Agency within 10 calendar days of the recall to expedite removal, replacement, and reimbursement.

Step 2: Determine if the food item is to be returned (to whom), or destroyed (by whom). If the information on how the item is to be returned or destroyed has not been provided in the recall notice, determine who in your school district is responsible for obtaining the information. Address your questions through this person. The person responsible should be designated in the standard operating procedure.

Step 3: Notify site personnel of the procedures, dates, etc. to be followed for collection or destruction of the recalled food product.

Step 4: Product to be returned: Follow the written instructions in the recall notice for returning the food product.

For USDA commodity foods, in the majority of situations the recalled product will be collected by the distributor to be returned to the vendor. School districts will work with the State Distributing Agency and the contracted warehouse/distributor to determine the appropriate method and time frame for collecting the recalled product. If the distributor delivers to a central location in the school district, it is the district's responsibility to consolidate the product from affected schools to a central location within the district's area of responsibility. The recalled product should be consolidated for collection as soon as possible, but no later than 30 days after the date of the recall notice.

Step 5: Product to be destroyed on-site:

Do not destroy any USDA commodity product without official written notification from FSIS or FDA. Follow manufacturer's or distributor's recall notification instructions for purchased food products.

If the food product is to be destroyed on-site, determine the procedures for on-site destruction of food products, who should be present, and who must be notified of the process. Due to the potential of a health risk to humans or animals, some State public health departments require notification of all food products to be destroyed before any action is taken.

11. Consolidate documentation from all sites for inventory counts.

12. Document any reimbursable costs.

Determine reimbursable costs for commodity food items. Contact the State agency or manufacturers for information on reimbursement for recalled foods.

13. Submit necessary paperwork for reimbursement of food costs.

For purchased foods, check with the distributor for protocol on reimbursement.

For USDA commodity foods, school districts and independent schools will receive necessary paperwork from the State Distributing Agency at time of the recall.

- 14. Complete and maintain all necessary documentation related to the recall for three years plus the current year.**
- Keep on file the recall notice along with any other communications from the food manufacturing company, State agency, or district central office.
 - Document that directions for handling the food have been followed. The recalled food has either been
 - Returned to the company,
 - Returned to the central office/warehouse, or
 - Destroyed on-site according to State and local procedures.
 - Submit paperwork for reimbursement.
- 15. Maintain copies of any communications received or sent in relation to the food recall for three years plus the current year.**
- 16. Maintain files of information provided to the school district public communications contact person; other media contact(s) and the public; and adverse health reports and subsequent actions for three years plus the current year.**

Food Recall Responsibilities at the School Site Level

1. Identify the recalled food product immediately.

Recalls are for specific foods from a named manufacturer or source. For example, if chicken nuggets with the Product Code 26091 from XYZ manufacturer were recalled, it does not mean chicken nuggets from all manufacturers or even all chicken nuggets produced by the XYZ manufacturer are part of the recall. Each recall is specific to a product code and a specific production run.

It is important to identify the product code, lot number, and pack date listed in the recall notice. Use the code and date to check any product in inventory. The most accurate way to identify the product is by reading the label. The best practice is to learn the product label and maintain complete records of deliveries and invoices. For more information, see Appendix 7, "How to Read a Label to Identify a Food Product."

2. Hold the food product and do not use until you know the final action.

Determine if you have any of the food product on hand and take necessary actions to hold the product to prevent its use until final action or removal can take place.

- Immediately physically segregate the product, including open containers or leftover product. Segregate suspect open containers that are unlabeled and do not contain product codes and any food items in current production that may contain the recalled food product.
- Mark the product “DO NOT USE ” and “DO NOT DISCARD.”
- Inform the entire staff not to use the marked product.
- Document the quantity in inventory.

3. Determine if the food product has been used.

Some ways to determine if the product has been used include reviewing invoices, production records, inventory records, and menu records.

4. Account for all food product that was received.

Add the count for the amount of product in inventory and the amount already used; the sum should equal the total amount that was received. This step is necessary to make sure that all recalled product has been removed from potential use.

5. If the recalled product has been used, document the date(s) used and to whom it was served (classes, not individuals).

6. If you have had any reports of health problems that could be related to consumption of the recalled food product, direct anyone affected to appropriate medical personnel or the school nurse. Collect the information to submit to the school district central office including persons’ names, reported symptoms of physical illness, and actions taken. Only health professionals should give medical advice.

7. Submit to the district central office the following information:

- Inventory counts of the recalled product on hand at the time of recall and counts or amounts of the product used before the recall notice was received
- How the recalled product was segregated from other food products and secured to prevent further use
- Information on whether the product was served; if it was served, provide information on to whom it was served and the date(s) served
- Reports of symptoms of adverse health problems and actions taken

8. Follow instructions given by the central office for collection, return, or destruction of the recalled food product.

9. Complete any necessary documentation for collection, return or destruction, and reimbursement.

10. Submit necessary documentation to the school district's central office.

11. Maintain copies of documentation on file for three years plus the current year including:

- Copies of communications received and sent regarding the food recall.
- Documentation related to the food recall that shows the required procedures were followed including:
 - How the product was secured to prevent use.
 - Return of the product
 - To the distributor/manufacturer or
 - To the central office/warehouse
 - Destruction of the product on-site and accompanying written notification to do so.
 - Records that show the date product was used and to whom it was served.
 - Reports from customers of symptoms of physical illness.

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Appendix 1

Commodity Hold and Recall Process

Following is the U.S. Department of Agriculture's (USDA) process for handling commodity holds and recalls. It was jointly developed by the Food and Nutrition Service, the Agricultural Marketing Service, the Farm Service Agency, and the Food Safety and Inspection Service. The process became effective August 1, 2001.

This new process:

- institutionalizes USDA's food hold/recall process;
- defines Federal, State and local agency roles and obligations;
- streamlines and expedites the reimbursement process;
- defines reimbursable costs;
- streamlines and improves communication at all levels;
- provides information to State and local agencies more quickly;
- limits commodity holds; and
- removes adulterated product from recipient agencies quickly.

Source: U.S. Department of Agriculture, Food and Nutrition Service, Agricultural Marketing Service, Farm Service Agency, Food Safety and Inspection Service. USDA commodity hold and recall process. Retrieved March 22, 2002, from www.fns.usda.gov/fdd/MENU/FOODSAFETY/foodsafety.htm

Commodity Hold and Recall Process

July 12, 2001

I. INTRODUCTION

The commodity hold and recall process is used when a food safety issue is raised about a U.S. Department of Agriculture (USDA) purchased commodity. The new process pertains exclusively to USDA-purchased commodities delivered to approved entities (recipient agencies and processors). It changes the existing recall process in the following ways:

- institutionalizes USDA's commodity food recall/hold process;
- streamlines and clarifies communications among USDA agencies – Agricultural Marketing Service (AMS), Food Safety and Inspection Service (FSIS), Farm Service Agency (FSA) and Food and Nutrition Service (FNS) - and with the U.S. Department of Health and Human Services' Food and Drug Administration (FDA) and the Department of Defense's Defense Supply Center Philadelphia (DOD);
- streamlines and expedites communications between USDA and State Distributing Agencies/local school districts;
- removes adulterated product from school districts as soon as possible, but not later than 30 days after recall; and
- defines reimbursable costs and expedites product replacement and reimbursement to State Distributing Agencies and school districts.

The process does not relieve vendors of their responsibility for replacement and reimbursement of recalled products.

To make it easier to explain the new process, this memorandum is divided into three primary areas: Decision and Notification Process, Product Disposition, and Reimbursement/Replacement Process. The appropriate responsibilities among the Federal, State, and local levels are discussed for each area. Attached are appendices providing acronyms and a description of allowable reimbursable costs.

II. DECISION AND NOTIFICATION PROCESS

As a reminder, if you suspect a food safety issue, immediately contact your local or State health department. In addition, please contact the Food and Nutrition Service (FNS) through their commodity hotline at 800-446-6991.

A. Federal Responsibilities

The responsible regulatory agencies, FSIS or FDA, receive food safety concerns from many sources including hotlines, sampling and testing programs, vendor notification, and State and local agencies including health departments. When the product involved is a USDA-purchased commodity, the following actions will take place:

1. FSIS immediately alerts FNS and, depending on the product, the appropriate Procurement Agency – AMS, FSA, or DOD - that there is a potential recall. The procurement agency identifies the potential destinations and amount of product involved. (Note: FSIS is responsible for regulating meat, poultry and egg products. FDA regulates the remaining products including fruits, vegetables, dairy, fish, grains, and nuts. FSIS will act as a liaison between FNS and the procuring agency on all recalls, including those regulated by FDA.)

2. FSIS/FDA begins its investigation, including product testing, and within **10 calendar days** makes a recommendation on the disposition of the product.
3. In the event initial testing is inconclusive, FSIS or the Under Secretary of Food Safety in conjunction with the procurement agency and FNS staff makes a recommendation to FNS as to whether to put the product on hold. FNS will communicate hold decisions to State Distributing Agencies, who will then inform the affected School districts. The hold is to provide time for additional testing and data collection and may result in a recommendation to the company for a recall.
4. When a firm recalls a product, FSIS or the Under Secretary of Food Safety communicates the recall decision to FNS and the appropriate Procurement Agency. FSIS prepares a recall notice and recommended press release and supporting information and supplies it to FNS within 24 hours of the recall decision. **FNS notifies State Distributing Agencies within 24 hours of the recall and provides them with the recall notification, press release, and other information needed to track the product and document reimbursable costs.** Commercial processors, where applicable, will be notified immediately if a recalled commodity has been shipped to their plant. At the same time, the Procurement Agency begins discussions with the vendor for pick-up and replacement of recalled product.

B. State Distributing Agency Responsibilities

1. The State Distributing Agency shall assign a State food safety coordinator and alternate and provide the names, titles, e-mail addresses, phone and fax numbers to FNS. Contact information must be provided for contacts during and after normal work hours. The State Distributing Agency shall have a similar contact list for its school districts.
2. Upon receipt of a recall notification, State Distributing Agencies must contact each affected school district as soon as possible, but **no later than 24 hours** after receiving the recall notification. State Distributing Agencies will disseminate the recall notification, press information, and other information needed to track the product and document reimbursable costs to affected school districts.
3. State Distributing Agencies should contact the appropriate distributor/warehouse, directing them to place the commodity on hold and to determine: a) the amount of recalled product still in storage at the State level, and b) the location and amount of product delivered to school districts.

C. School District Responsibilities

1. Each school district is responsible for appointing a food safety coordinator and providing the name, title, email address, phone and fax numbers to the State Distributing Agency.
2. In the event of a food recall, affected school districts will receive from the State Distributing Agency a recall notification, press release, and request for information to be returned.
 - The recall notification will provide the name of the product, affected lot numbers, and other product information.
 - Additional information will be included to assist school districts to respond to requests from media, parents, school district officials, and others.
 - School districts must provide the location and quantity of product in storage, amount of product already consumed, and document reimbursable costs.

3. School districts must **immediately** notify their sites of the recall, identify the location of the affected products (verify that the food items bear the product identification codes), isolate the commodities to avoid accidental use, and take an accurate inventory by location.

The quantity and location of the product must be submitted to the State Distributing Agency within **10 calendar days** of the recall. This quick turnaround is important for the following reasons:

- When a recall occurs, USDA contracting officers work with the vendor to expedite removal of the product and replacement of the product. During these discussions, it is important for both USDA and the vendor to know the scope (locations and quantity) of the recall;
- USDA needs the cost data as soon as possible in order to expedite the reimbursement.

III. PRODUCT DISPOSITION

A. Federal Responsibilities

While State Distributing Agencies and school districts are compiling inventory information, the procurement agency will work with the vendor to determine the best course of action for collecting the recalled product at local or centralized locations. In certain circumstances, product may be destroyed on-site, if agreed by the vendor and approved by FSIS.

B. State Distributing Agency Responsibilities

State Distributing Agencies will be in constant communication with school districts and affected warehouses/distributors. In the majority of situations, the recalled product will be returned to the vendor from central locations within each State. In those situations, State Distributing Agencies will contact each affected distributor/warehouse to arrange for timely pick-up of the recalled product from each school. If the distributor delivers to a central location at the school district, it is normally the school district's responsibility (depending on their contract with the distributor/warehouse) to consolidate the product from affected schools to a central location within the school district's area of responsibility for pick-up. **The recalled product should be consolidated for pick-up as soon as possible, but no later than 30 days after the date of the recall notification.**

C. School District Responsibilities

School districts will work with the State Distributing Agency and the contracted warehouse/distributor to determine the appropriate method and timeframe for picking up the recalled product.

IV. REIMBURSEMENT/REPLACEMENT PROCESS

On October 31, 1998, Congress enacted Public Law 105-336, the William F. Goodling Child Nutrition Reauthorization Act of 1998 (the Act). Section 15 of the Act authorized the Secretary to reimburse States for State and local costs associated with the removal of commodities if the Secretary determined that the commodities posed a health or safety risk. The law stipulates that reimbursable costs are limited to "storage, transportation, processing, and distribution of the commodities."

When a recall occurs, in most cases the vendor/processor is responsible for replacing the affected product and reimbursing Federal, State, and local agencies for allowable costs incurred as a result of the recall. USDA will request that vendors make restitution for those State Distributing Agencies that have submitted

timely documentation within **20 working days from the date of the recall notification**. Should payment from the vendor not occur, USDA may reimburse the State and local agencies for specified costs and seek reimbursement of those expenditures from the vendor/processor.

Described below are several types of recalls and holds and a discussion and corresponding replacement/reimbursement instructions:

A. Food Safety Recalls

When a commodity is recalled, USDA will proceed according to the type of commodity product involved, as follows:

1. Commodity Delivered As Purchased by USDA (e.g., frozen ground beef, bought and delivered to the State Distributing Agency as frozen ground beef.)
 - Vendor assumes responsibility for replacement and costs incurred by the State Distributing Agency/school districts. Should vendor default or delay restitution 20 days after notification, USDA will initiate action to replace the product and may reimburse State Distributing Agency/school districts for certain costs as described in paragraph V below. USDA continues to seek reimbursement from the vendor.
2. Reprocessed Commodity Delivered to State Distributing Agency/school districts (e.g., bulk chicken into breaded, cooked chicken nuggets)
 - USDA purchases bulk commodities for further processing at the request of State Distributing Agencies. State Distributing Agencies contract directly with processors to have the commodity made into a processed product. USDA is not a party to that contract. In some cases, the raw product may be the source of contamination resulting in a health or safety risk and in other situations the source of contamination may be the reprocessor's plant. In addition, in some cases the processor may be substituting equivalent commercial product for the commodity product (called Substitution). Each scenario is unique, and resolution will proceed in the manner described in the subsequent numbered topics.
3. When Raw Product Is Recalled (With No Substitution)
 - When bulk product that has already been further processed (end product) is determined to pose a health or safety risk, the commodity vendor is responsible for all costs incurred by the USDA, the State Distributing Agency and/or school districts, including processing costs pursuant to the terms of the processing contract. Should vendor default or delay restitution 20 days after notification, USDA will initiate action to replace the raw product and reimburse State Distributing Agencies/school districts for processing costs while seeking reimbursement from the vendor.
 - USDA is not a party to the processing contract and cannot make payments directly to processors – only to a State Distributing Agency who in turn can pay processors. State Distributing Agencies should submit copies of paid processor bills with their reimbursement package. In situations where a State has not paid a processor but the processor has incurred processing expenses, the State Distributing Agencies must work closely with USDA and the processor to come to an acceptable solution.

4. When Raw Product Is Recalled (With Substitution)

- With USDA approval, processors may substitute commercial product for donated commodities to produce finished end products for State Distributing Agency/school districts. The processor may then use the USDA commodity to produce commercial product for sale to commercial outlets. This is a commercial recall and USDA will not assume responsibility for costs incurred beyond replacement of the implicated commodity. USDA will seek reimbursement from the vendor as in other cases.

5. When End Product Is Recalled (Commercial Recall)

- When the bulk product delivered to the processor is safe, but the end product is determined to be a health or safety risk, normally due to a problem at the processing plant, it will be treated as a commercial recall. The processor assumes responsibility for all costs incurred by the USDA and the State Distributing Agency/school district, pursuant to the terms of the processing contract. USDA will not assume responsibility for costs incurred.

B. Administrative Recalls

The Department may occasionally decide to remove products from distribution when it decides safety is a concern, even though the products technically meet purchase specification requirements and are free to move in commercial distribution channels. FNS shall be responsible for notifying the State Distributing Agencies. Since these products ostensibly meet purchase specification requirements, USDA will develop strategies for disposition and replacement of the product and reimburse States and recipient agencies for their reimbursable costs, including any incurred processing fees, within acceptable limits. Although commodities are normally delivered 6 to 8 weeks after purchase, USDA will attempt to expedite delivery of replacement products. USDA will coordinate product removal, replacement, and expense reimbursement.

C. Specification Recalls

A commodity that does not meet product specifications may voluntarily, or at USDA's request, be recalled. If recall at the direction of USDA, FNS shall be responsible for notifying the appropriate State Distributing Agencies. The vendor, working with the relevant Procurement Agency, is responsible for retrieving and promptly replacing the identified commodity and reimbursing State Distributing Agencies/school districts for transportation and storage expenses.

D. Holds

Commodities may be placed on hold for up to 10 calendar days to prevent use until further testing and inspection can clarify a suspected problem. FNS is responsible for notifying the appropriate State Distributing Agencies. FSIS (or FDA through the Under Secretary of Food Safety), in consultation with FNS staff and the responsible procurement agency, is responsible for making the recommendation to FNS to put the product on hold. If a product is held beyond 10 days for further testing, USDA may instruct the State Distributing Agency to immediately consolidate the product and put it under State Distributing Agency control. USDA may reimburse State Distributing Agencies/school districts as follows:

1. Product Placed on Hold, Then Released

- If the hold extends beyond 10 calendar days, USDA may reimburse State Distributing Agencies/school districts up to one month's standardized storage cost, if applicable. If held product is returned to the State Distributing Agency warehouse, USDA may reimburse for one round trip (remove the recalled product to State control and return it to the school district) to and from State Distributing Agency's warehouse/distributor.

2. Product Placed on Hold by Local Health Inspector, Then Released or Voluntarily Recalled by Vendor

- In instances in which USDA, through FSIS and FDA, does not concur with local health inspectors that probable cause existed for the hold, USDA assumes no responsibility for costs incurred by the State Distributing Agencies/school districts.

V. REIMBURSABLE/REPLACEMENT PROCESS AND RESPONSIBILITIES

When a donated commodity poses a health or safety risk, the vendor must replace the product and reimburse the State Distributing agencies/school districts in accordance with their contracts. Should the vendor default or delay restitution more than 20 days after notification, USDA may replace the commodities and reimburse the State Distributing Agencies/school districts. Subsequently, USDA will seek reimbursement from the vendor. USDA may reimburse State Distributing Agencies for the following expenses:

- One month standardized storage costs (see Appendix 1-B);
- One round trip transport of commodities;
- On-site destruction of commodities, when approved by USDA; and
- Processing costs, when a State Distributing Agency/school district has further processed the product under an approved agreement, subject to the limitations in Section IV. A.

A. Federal Responsibilities

1. The responsible Procurement Agency will closely monitor the process to attempt to ensure the vendor/processor initiates reimbursement within 20 days of the recall notification. During this time, the procurement agency will process the reimbursement documentation/invoice received from the State Distributing Agencies. Should the vendor/processor delay restitution or default, AMS/FSA will authorize the National Finance Center (NFC) to electronically transmit reimbursement to each State Distributing Agency **within 4 working days**, provided the State Distributing Agency has established a vendor express account as outlined below. If the State Distributing Agency has not established a vendor express account, they will be mailed a check within 10 working days.
2. For claims not received within the initial timeframes, a final disbursement will be completed **within 90 calendar days** after the start of the recall.
3. FNS Regional Offices will review documentation submitted by local agencies and the State Distributing Agency during management evaluations. Findings of inadequate documentation can result in a claim against the State Distributing Agency.

4. FNS and the responsible procurement agency, in consultation with the vendor, will make a decision regarding replacement of product or entitlement credit **within 60 calendar days** of the recall notification. The preferred method is replacement of product. If the vendor agrees to replace the product, it will not be delivered to the State Distributing Agency between April 1 and August 1, except when mutually agreeable to the vendor and the State Distributing Agency.

B. State Distributing Agency Responsibilities

In order to take advantage of the expedited payment system, each State Distributing Agency must complete and submit to AMS a Vendor Express Application. Once processed, each State Distributing Agency will receive a unique Vendor Express Number. This is a one-time process. In the event that the State Distributing Agency changes banks or other pertinent information, a change must be submitted to AMS.

1. After receiving the reimbursement documentation from the school districts, State Distributing Agencies must consolidate this information, including any expenses, and submit a USDA Public Voucher and documentation via fax or mail to the appropriate USDA program within **3 working days**. In other words, the Procurement Agency must receive the consolidated State information within 15 calendar days from the recall notification date (10 calendar days at the school district and up to 3 working days at the State Distributing Agency). State Agencies failing to meet this deadline will be reimbursed at close-out (90 calendar days).
2. State Distributing Agencies are responsible for ensuring the sufficiency and accuracy of the school district documentation prior to submission to the Department. Documentation not supplied to USDA must be maintained on file as per Federal record retention requirements and be available for review.
3. Upon receiving the electronic funds transfer from USDA, State Distributing Agencies shall reimburse school districts in a timely manner. (Note - In some cases, the State Distributing Agency does not have payment capabilities. In those instances, it is important that the State Distributing Agency reaches an agreement with the Child Nutrition State Agency to process payments to school districts. There may also be other outlets involved [charitable institutions, Regional Office Administered Programs, summer camps, etc.] with which the State Distributing Agency has no agreement. In those cases, the State Distributing Agency must work closely with USDA to ensure timely reimbursement to these entities.)

C. School District Responsibilities

The quantity and location of the product must be submitted to the State Distributing Agency within 10 calendar days for the school district to be reimbursed within 30 days of the recall notification. If the school district does not meet this deadline, reimbursement will be made at the close-out of the recall process (90 calendar days). Refer to Appendix 1-B for a discussion of reimbursable costs.

Appendix 1-A

Commonly Used Acronyms and Definitions

AMS	Agricultural Marketing Service (USDA)
DOD	Department of Defense
FDA	Food and Drug Administration (US Dept of Health and Human Services)
FNS	Food and Nutrition Service (USDA)
FSA	Farm Service Agency (USDA)
FSIS	Food Safety and Inspection Service (USDA)
Processor	Any commercial facility that further processes or repackages donated food under contract with a State Agency
Procurement Agency	AMS or FSA or DOD
USDA	United States Department of Agriculture
Vendor	A business that has a contract with USDA to provide USDA commodities

Reimbursable Costs

A. Reimbursable State Distributing Agency Costs

1. Transportation - In some cases, transportation charges are incurred by the State Distributing Agency. USDA will reimburse for appropriate transportation costs incurred by the State Distributing Agency, based on the fixed standardized charges contained in the distributor/warehouse contract (whether per case or per pound). In some cases, the State Distributing Agency's costs may exceed these fixed charges because the contracted distributor/warehouse/trucker could charge more to remove the recalled product because it is a special trip or the State Distributing Agency may have to contract with a different firm entirely to handle collection. In these cases, USDA will consider, with appropriate documentation, reimbursing the actual charge.
2. Storage - USDA will reimburse for one month's storage (at the contracted price), as appropriate. If the product is stored longer than the 30 days, additional storage costs may be reimbursed at close-out.
3. Processing (State processing contracts) - USDA may reimburse State Distributing Agencies for processing fees associated with the further processing of commodities. Please review Section IV.
4. On-Site Destruction - USDA may approve the on-site destruction of recalled commodities. State Distributing Agencies will be reimbursed for the actual costs associated with this destruction (with proper documentation). Since this activity will not take place within the first 7 days after the notification of the recall, these costs will be reimbursed at close-out.
5. Non-Reimbursable Costs - Listed below are examples of non-reimbursable costs:
 - Overtime compensation for employees as a result of the recall
 - Long-distance telephone calls, postage, and other administrative costs
 - Costs associated with processing payment to school districts
 - Value of the recalled product (since it will be replaced or credited)

B. Reimbursable School District Costs

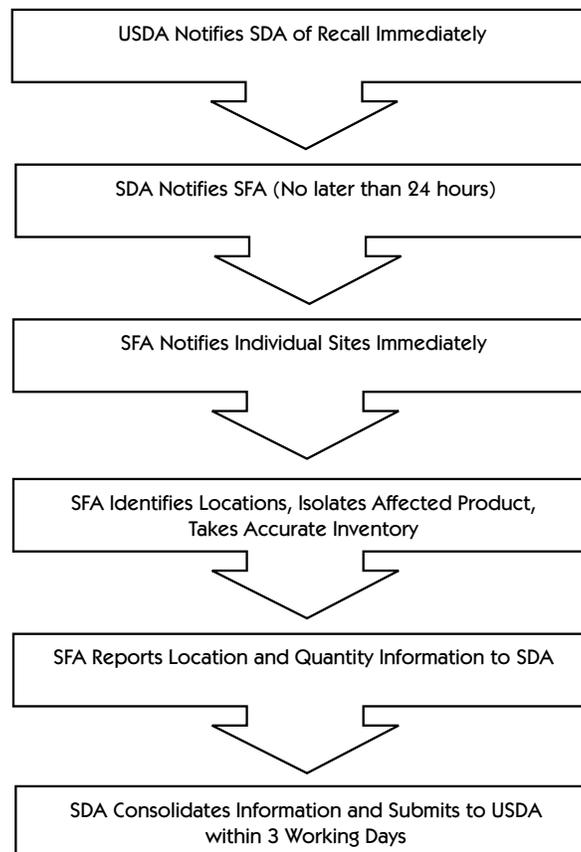
As stipulated by the Act, allowable costs are limited to: storage, transportation, processing, and destruction, where applicable. In an effort to expedite payment to school districts, USDA will reimburse using standardized costs in the following manner.

1. Transportation - USDA will reimburse for one round trip (original delivery and return of the recalled product) between the distributor/warehouse and the school district. This will be based on the fixed standardized charges contained in the distributor/warehouse contract (whether per case or per pound). In some cases, the costs may exceed these fixed charges because the contracted distributor/warehouse/trucker could charge more to remove the recalled product because it is a special trip or the State Distributing Agency or school district may have to contract with a different firm entirely to handle collection. In these cases, USDA will consider, with appropriate documentation, reimbursing the actual charge.
2. Storage - If the school district contracts with a local warehouse to store commodities, USDA will

reimburse for 1 month's storage (at the contracted price), as appropriate. In the event the product is stored longer than 30 days, additional storage costs may be reimbursed at close-out.

3. Processing - USDA may reimburse school districts through the State Distributing Agency for reasonable processing fees associated with the further processing of commodities.
4. On-Site Destruction - USDA may approve the on-site destruction of recalled commodities. If approved, school districts will be reimbursed for the actual costs associated with this destruction (with proper documentation). Since this activity will not take place within the first 7 days after the notification of the recall, these costs will be reimbursed at close-out.
5. Non-Reimbursable Costs - Listed below are examples of non-reimbursable costs:
 - Cost of storage at the school level
 - Overtime compensation for employees as a result of the recall
 - Long-distance telephone calls and other administrative costs
 - Reimbursement for commercially purchased food used in place of the recalled product (since it will be replaced or credited)

Process for Commodity Recalled Foods



SDA – State Distributing Agency
SFA – School Foodservice Authority

Frequently Asked Questions

Who regulates food products?

The type of food product determines which Federal agency is responsible for regulation.

- **Meat and poultry products** – The Food Safety and Inspection Service (FSIS) of the USDA inspects and regulates meat and poultry products. FSIS is responsible for ensuring that meat and poultry products are safe, wholesome, and correctly labeled and packaged.
- **Pasteurized egg products produced in federally inspected plants** – Pasteurized egg products are eggs that have been removed from their shells for further processing. FSIS is responsible for inspecting the products while they are in the manufacturing plant. The Food and Drug Administration (FDA) assumes responsibility for pasteurized egg products after they leave the processing plant.
- **All other food products** – All other food products, except those regulated by FSIS, fall under the regulatory authority of the FDA which is responsible for ensuring that the foods are safe, wholesome, and correctly labeled and packaged. **However, because FSIS is the primary agency for commodity foods, they act as the liaison agency in all recalls of commodity foods including those regulated by FDA.**

Who decides if there will be a food recall?

There are some minor differences in the decision-making process for food products that fall under FSIS and FDA jurisdictions. The manufacturer plays an important role in the decision to recall a product.

- **FSIS** - All recalls are voluntary and may be initiated by
 - The manufacturer or distributor of the meat or poultry product or
 - At the request of FSIS.

If a company should refuse to recall their product, FSIS has the legal authority to detain and/or seize meat and poultry product(s) in commerce when there is reason to believe they are hazardous to public health or if other consumer protection requirements are not met.

- **FDA** - Recalls may be conducted
 - On a firm's own initiative,
 - By FDA request, or
 - By FDA order under statutory authority.

How are potentially unsafe food products discovered?

A food that is potentially unsafe may be discovered in a variety of ways described below.

1. **Manufacturer or distributor:** The company that manufactured or distributed the food can inform FSIS (Food Safety and Inspection Services) or FDA of a potentially unsafe food product.
2. **FSIS samples:** FSIS takes samples of meat and poultry products during the manufacturing process. Sometimes discovery of the potentially unsafe food product is made through the test results of routine samples. Even if a meat or poultry product has been inspected and approved by FSIS, it must be recalled anytime new information becomes available that indicates a possible health concern.
3. **FSIS or FDA field personnel:** FSIS and FDA field personnel inspect food-manufacturing plants to gather information and make observations about the manufacturing processes and products. During these routine inspections or food safety audits, inspectors may discover information that identifies potentially unsafe or improperly labeled foods.
4. **Consumers:** USDA/FSIS or DHHS/FDA may learn of a potentially unsafe food from consumer complaints, notice from health professionals, or review of epidemiological data submitted by State and local public health departments.
5. **Other Federal agencies:** Departments within USDA or other Federal agencies such as the Centers for Disease Control and Prevention (CDC) or the Department of Defense may be notified of a potential health problem. That agency then notifies FSIS or FDA.

What happens after a potentially unsafe food has been identified?

When a potentially unsafe food is identified, FSIS/FDA begins an investigation and testing of the product in order to make a decision about a recall. The investigation process may include some or all of the following steps.

- Evaluate the information in the report to determine the seriousness of the problem.
- Request additional information from the person making the report.
- Interview a consumer who was reported to have become ill or injured because of the food.
- Collect information about the suspected food and check to make sure the information is correct.
- Document the time when each reported event occurred.
- Contact the manufacturer of the food for more information.
- Discuss the problem with FSIS and FDA personnel who have knowledge or experience related to the product.
- Collect and analyze food samples.
- Contact State and local health departments.

The agency has a maximum of 10 calendar days after receiving the complaint or having a potentially unsafe food product identified to make a recall decision for commodity foods.

There is no defined number of days for a recall decision for purchased foods. Within these time periods, FSIS or FDA must make one of three decisions:

1. The food product is safe and may be used;
2. The product is contaminated and must be recalled; or
3. The product condition is still unclear and further testing is required.

What other actions do FSIS or FDA take during this time period?

USDA Commodity Foods:

During the 10-day time period while the investigation is being conducted, the agency (FSIS or FDA) also must:

- Determine if the product must be put on hold until a final decision is reached. Holds must not last longer than 10 calendar days from the time that State agencies are notified. There is one exception to this rule: the Federal office of Public Health and Safety-Department of Health and Human Services has the authority to extend “hold” time frames if scientific tests are being conducted that need longer waiting periods for results.
- Contact the vendor immediately and begin to identify the contracts and deliveries that may be affected by the recall.
- Begin working on information for public release that will be provided to State Distributing Agencies, school districts, and schools in the event that a recall decision is made. The public release will explain why the product is being recalled and give the procedures that should be followed. This information will allow district directors and food safety coordinators to adequately address inquiries from media, parents, local government officials, etc.

Purchased foods:

During the undesignated time period that a purchased food is on hold, FSIS or FDA:

- Contacts companies to gather information about the product and its distribution.
- Begins investigations to determine what further actions are needed.
- Begins working on information for public release.

What are the roles of FSIS and FDA in a food recall?

FSIS and FDA are responsible for the following decisions and tasks when a food is recalled.

1. **Determine a recall classification based on the health risk to consumers.**
A recall classification is always listed in the recall notification. It is a code that FSIS and FDA use to help consumers know the seriousness of the effects of consuming the product. The wording used in the legal definitions for the two agencies differs slightly; however, the following chart summarizes the definitions to improve understanding of the classification of a food recall.

Recall Classifications

Recall Classification	General Definition	Example
Class I	Involves a health hazard situation where there is a reasonable probability that consuming the product will cause adverse health problems or death.	Ready-to-eat product - luncheon meat or hot dogs contaminated with a pathogen or bacteria.
Class II	Involves a potential health hazard situation where there is a remote probability of adverse health problems from consuming the product.	Product found to have small pieces of plastic. Also a product that is found to contain an allergen, such as dry milk, that is not mentioned on the label.
Class III	Involves a situation when consuming the product will not cause adverse health problems.	Product that has a minor ingredient missing from the label that is not an allergen such as labeled processed meat in which added water is not listed on the label as required by federal regulations.
Withdrawal	Only FDA uses this classification. The situation occurs when a product has a minor violation that would not be subject to FDA legal action. The firm removes the product from the market or corrects the violation.	Product removed from the market due to tampering, without evidence of manufacturing or distribution problems.

For more information on recall classifications:

www.fsis.usda.gov/OA/pubs/recallfocus.htm

Retrieved March 22, 2002

www.cfsan.fda.gov/~lrd/recall2.html

Retrieved March 22, 2002

1. Verify that the manufacturing firm has identified all distribution information for the food product.

This step helps to ensure that the product can be identified and returned in an appropriate and timely manner.

2. Make recommendations to the company regarding the classification of the recall.

After the responsible government agency has completed its investigation of the food product, the manufacturing company is notified of the government agency's preliminary recommendation of the classification of the recall to be conducted. The responsible government agency also provides the company with an opportunity to offer any other information it wishes for the agency to consider regarding the recall. Any new information is considered before a final recommendation is made as to the classification of the recall to be conducted.

3. Notify the public of the food recall.

Food Safety and Inspection Service

FSIS notifies the public in two ways

- Press release
- Recall Notification Report

Both notices are also posted on the Food Safety and Inspection Service Recall Information Center: <http://www.fsis.usda.gov/OA/FAQ/hotlinefaqindex.htm#4>
Retrieved March 22, 2002

Recall Notification Reports provide the public with detailed information about meat and poultry recalls. The following information is provided in the report:

- A description of the food being recalled
- Any identifying codes
- The reason for the recall
- The name of the producing establishment
- Distribution information
- The recall classification
- The appropriate contact persons for FSIS and the recalling company

Recall Notification Reports are sent by facsimile and electronic mail to food safety and public health officials throughout the country at the Federal, State, and local levels. The notification provides the public health community with important information to use in following up on reported illnesses that may be associated with the recalled product.

Food and Drug Administration

FDA has guidelines for manufacturers¹ to follow in recalling defective products that fall under the Agency's jurisdiction. These guidelines make clear that FDA expects the manufacturers to take full responsibility for product recalls, including follow-up checks to assure that recalls are successful. Under the guidelines, companies are expected to notify FDA when recalls are started, to make progress reports to FDA on recalls, and to undertake recalls when asked to do so by the Agency.

Even though the manufacturer recalling the product may issue a press release, FDA seeks publicity about a recall only when it believes the public needs to be alerted to a serious hazard. For example, if a canned food product, purchased by a consumer at a retail store, is found by FDA to contain *Clostridium botulinum toxin*, an effort would be made to retrieve all the cans in circulation, including those in the hands of consumers. As part of this effort the Agency also could issue a public warning via the news media to alert as many consumers as possible to the potential hazard.

FDA also issues general information about all new recalls it is monitoring through a weekly publication titled "FDA Enforcement Record" which is available by subscription from the Superintendent of Documents or on FDA's Web site at www.fda.gov/opacom/enforce.html
Retrieved March 22, 2002

5. FSIS conducts "effectiveness checks" of the recalling company to ensure that it makes all reasonable efforts to retrieve the recalled meat or poultry.

A reasonable number of effectiveness checks are made to verify that the recall is conducted in an effective manner and that the firm locating, retrieving, controlling, and disposing of the food(s) is following regulatory requirements.

After FSIS has determined that the recalling firm has made all reasonable efforts to retrieve and appropriately dispose of the recalled food, the firm is officially notified by letter that the recall has been completed and no further action is expected.

6. FDA develops a strategy for each individual recall that sets forth how extensively it will check on a company's performance in recalling the product in question. For a Class I recall, for example, FDA would check to make sure that each defective product has been recalled or reconditioned. In contrast, for a Class III recall the Agency may decide that it only needs to spot check to make sure the product is off the market.

Source: Adapted from www.fsis.usda.gov/OA/pubs/recallfocus.htm
Retrieved March 22, 2002

¹ For commercial (purchased) foods, FDA uses "firm" to designate the manufacturer.

Mock Recall Notification Report and Mock Recall Press Release

Food Safety and Inspection Service
United States Department of Agriculture
Washington, D.C. 20250-3700

Mock Notification Report XXX-Year
Date

Mock Recall Notification Report

U.S. DEPARTMENT OF AGRICULTURE • FOOD SAFETY AND INSPECTION SERVICE

Product(s) Recalled:	Ready-To-Eat Turkey Ham Rolls
Production Dates/ Identifying Codes:	Produced on November 13, 2001. The labels bear the establishment number "EST. 04" inside the USDA mark of inspection. The product being recalled is as follows: <ul style="list-style-type: none"> • "HURRY UP Turkey Ham Rolls" in 5 lb. bags with product code HU1234, "SELL BY 2-09," and production date code 6324. This product was distributed to institutional and retail establishments in Illinois, Oklahoma, and Kentucky.
Problem/Reason for Recall:	The product may be underprocessed.
How/When Discovered:	The firm reported to FSIS that its quality assurance investigation of a consumer complaint revealed possible underprocessing.
Federal Establishment:	XXX Hurry Up Foods, Inc., 1926 Lazy Lane, Candoit, OK 22311
Consumer Contact:	Phil Awful, Director of Quality Assurance, 800-555-7777
Media Contact:	E. Z. Goins, Director of Customer Services, 800-555-7777
Quantity Recalled:	Approximately 11,000 pounds
Distribution:	Illinois, Oklahoma, and Kentucky
Recall Classification:	Class I
Recall Notification Level:	Institutional and Retail Establishments
Press Release:	Yes
Direct Notification Means:	The firm has notified its customers orally and will follow-up in writing.
FSIS Followup Activities:	Effectiveness checks by the FSIS, District Enforcement Operations.
Other Agencies Involved:	None
FSIS Contacts:	<ul style="list-style-type: none"> • Compliance/Recall Coordinator: 202-418-8874 • Recall Management Division: 202-690-6389 • Congressional Inquiries: 202-720-3897 • Consumer Inquiries: 800-535-4555 or 800-256-7072 (TTY) • Web Site: www.fsis.usda.gov/ (FSIS Main Page) or www.fsis.usda.gov/OA/recalls/rec_intr.htm (Recall Information Center)
Date of Recall Meeting:	Date
Recall Case Number:	XXX-Year

Mock Press Release

FSIS-RC-Number

CLASS I RECALL
HEALTH RISK: HIGH

Congressional and Public Affairs
Phone Number; FAX Number
Contact Names

Oklahoma Firm Recalls Turkey Ham Rolls For Underprocessing

WASHINGTON, (Date)—Hurry Up Foods, Inc., a Candoit, Oklahoma firm, is voluntarily recalling approximately 11,000 pounds of ready-to-eat turkey ham rolls because the products may be underprocessed, the U.S. Department of Agriculture's Food Safety and Inspection Service announced today.

All products being recalled were produced on Nov. 13, 2001 and bear the establishment number "EST. XXX" inside the USDA seal of inspection on the label. This ready-to-eat turkey ham roll was distributed to retail and institutional establishments in Illinois, Oklahoma, and Kentucky.

The following product is subject to recall:

- "HURRY UP Turkey Ham Rolls" in 5 lb. Bags with product code HU1234, "SELL BY 2-09," and production date code 6324. This product was distributed in institutional establishments in Illinois, Oklahoma, and Kentucky.

"Because of the potential hazard of foodborne illness, I urge consumers who have purchased the suspect product not to eat it and return it to the place of purchase," said NAME, FSIS administrator. "FSIS is informing the public so consumers who may have purchased and stored the product in their refrigerators or freezers can know to check. Diners may also wish to ask if their meal contains the recalled products."

"Hurry Up Food Systems" identified this problem after receiving a consumer complaint. No illnesses or injuries associated with consumption of these products have been reported. Anyone concerned about an illness should contact a physician.

Consumers with questions about the recall may contact Phil Awwful, Director of Quality Assurance, Hurry Up Foods, at 800-555-7777. Media with questions may contact E. Z. Goins, Director of Customer Services, Hurry Up Foods at 800-555-7777.

NOTE: Access news releases and other information at the FSIS Web site at www.fsis.usda.gov
Retrieved March 22, 2002

Sources of Additional Information on Food Recalls

Information on recalls of meat and poultry products

Food Safety and Inspection Service Recall Information Center Web site:
www.fsis.usda.gov/oa/recalls/rec_intr.htm

Meat and Poultry Hotline 800-535-4555
Washington DC area: 202-720-3333
TTY: 800-256-7072
e-mail: mphonenumber.fsis@usda.gov

The hotline can be reached from 10 a.m. to 4 p.m. (Eastern Time) Monday through Friday, and recorded food safety messages are available 24 hours a day.

Information on recalls of all other foods

FDA's Center for Food Safety and Applied Nutrition's Outreach and Information Center at 888-SAFE FOOD (888-723-3366)
Food and Drug Administration's Web site: www.fda.gov/

Additional food safety information

Gateway to Government Food Safety Information
Web site: www.foodsafety.gov/

Appendix 4

Food Recall Action Checklist

Directions: Use this list when notice of a commodity or purchased food recall is received. The Checklist is divided into the responsibilities at the administrative and the school site level. If you work in an independent school, you are responsible for the tasks described for both the administrative and school site level.

Additional responsibilities unique to a USDA commodity food recall are shown in italics.

Part 1: Responsibilities at the Administrative Level

TASK	PERSON RESPONSIBLE	COMPLETION DATE
<p>1. Have a copy of the district's standard operating procedure related to food recalls. <i>Each school district is required to appoint a Food Safety Coordinator and provide the name, title, e-mail address, and phone and fax numbers to the State Distributing Agency.</i></p> <p>2. Review the food recall notice.</p> <ul style="list-style-type: none">• Determine the problem as stated in the recall.• Review specific directions in the communication(s).• Determine actions that must be taken. <p>3. Communicate the food recall notice to school sites and document that the recall notice was received at each site.</p> <p>4. Collect health-related information needed for public communications for Class 1 or Class 2 recalls. The following information will need to be collected and documented in writing.</p> <ul style="list-style-type: none">• Determination of when the product was served, to whom it was served (classes), and date(s) served.• Reports of health problems that may be related to the recalled product (if it has been served) including physical symptoms of illness and any actions taken.		

TASK	PERSON RESPONSIBLE	COMPLETION DATE
<p>5. Work with the school district public communications contact person. Provide:</p> <ul style="list-style-type: none"> • Copies of the food recall notice; • Press releases; • Any additional information related to the recall; • Information on whether the product has been used and served including, to whom and the date of service; and • Reports of potential adverse health risks related to the recalled product. <p>6. Identify and record whether any of the product was received in the district, locate the recalled food product by site, and verify that the food item bears the product identification code(s) and production date(s) listed in the recall notice.</p> <p>7. Obtain accurate inventory counts of the recalled product from every school site including amount in inventory and amount used.</p> <p>8. Account for all of the recalled food by verifying inventory counts against records of food received at the sites.</p> <p>9. Confirm that school sites have segregated and secured the recalled food product.</p> <p>10. Conform to the recall notice using the following steps:</p> <ul style="list-style-type: none"> • Report quantity and site where product is located to manufacturer, distributor, or State Agency for collection. (<i>The quantity and location of the affected USDA commodity food must be submitted to State Distributing Agency within 10 calendar days of the recall.</i>) • Determine if the food is to be returned (to whom), or destroyed (by whom). • Notify site personnel of procedures, dates, etc. to be followed for collection or destruction of food product. 		

TASK	PERSON RESPONSIBLE	COMPLETION DATE
<ul style="list-style-type: none"> • If the product is to be returned, follow procedures. <i>For school districts with central delivery, the product should be consolidated for collection as soon as possible, but no later than 30 days after the date of the recall notification.</i> • If the product is to be destroyed, confirm that written notification is on file. Follow procedures provided by State and local agencies. • Consolidate documentation from all sites for inventory counts. • Document any reimbursable costs. <p>13. Submit necessary paperwork for reimbursement of food costs. <i>You will receive necessary paperwork for USDA commodity foods from the State Distributing Agency at time of recall.</i></p> <p>14. Complete and maintain all required documentation related to the recall.</p> <ul style="list-style-type: none"> • Recall notice and communications about the product • Records of how food product was returned or destroyed • Reimbursable costs <p>15. Maintain copies of all communications received or sent in relation to the food recall for three years plus the current year.</p> <p>16. Maintain copies of all information provided to public communication contact person, other media contact(s), and the public; adverse health reports and actions taken for three years plus the current year.</p>		

Food Recall Action Checklist

Directions: Use this list when notice of a commodity or purchased food recall is received. The Checklist is divided into the responsibilities at the administrative level and the school site level. If you work in an independent school, you are responsible for the tasks described for both the administrative and school site level. *Additional responsibilities unique to a commodity food recall are shown in italics.*

Part II: Responsibilities at the School Site Level

TASK	PERSON RESPONSIBLE	COMPLETION DATE
<ol style="list-style-type: none"> 1. When the recall notice is received, identify the recalled food product immediately using the manufacturer's product code(s), lot number(s) and the date(s) of the production run. 2. Hold the product using the following steps: <ul style="list-style-type: none"> • Physically segregate the product, including any open containers, leftover product, and food items in current production that contain the recalled food. If an item is suspected to contain the product, but label information is not available, follow the district's procedure for disposal. • Mark the product "DO NOT USE" and "DO NOT DISCARD." • Inform the entire staff not to use the marked product. • Document the quantity in inventory. 3. Determine if the product has been used by reviewing invoices, production records, inventory records, and menu records. 4. Account for all of the food product that was received. Add the count of the amount of product in inventory and the amount already used; the sum should equal the amount that was received. Make sure all of the food product has been removed from use. 5. If the recalled product has been used, document the date(s) used and to whom it was served (classes, not individuals). 6. If you have any reports of health problems that could be related to consumption of the food product, direct anyone affected to 		

TASK	PERSON RESPONSIBLE	COMPLETION DATE
<p>appropriate medical personnel or the school nurse. Collect information to submit to the district central office including persons' names, reported symptoms of physical illness, and actions taken.</p> <ol style="list-style-type: none"> 7. Submit to the district central office: <ul style="list-style-type: none"> • Inventory counts of the recalled product and counts or amounts of the product used before the recall notice was received; • How the recalled product was segregated and secured to prevent further use; • Information on whether the product was served; if served, to whom (classes) and the dates of service; • Reports of health problems and actions taken. 8. Follow instructions given by school district central office for collection, return, or destruction of the recalled food product. 9. Complete any necessary documentation for collection, return or destruction, and reimbursement. 10. Submit necessary documentation to the school district's central office. 11. Maintain copies of documentation on file for three years plus the current year including: <ul style="list-style-type: none"> • Copies of communications received regarding the food recall • Documentation related to the food recall that shows the required procedures were followed including <ul style="list-style-type: none"> ○ How the product was secured to prevent use ○ Return of the product <ul style="list-style-type: none"> • To the distributor/manufacturer or • To the central office/warehouse • Destruction of the product on site, if notified to do so • Records that show the date product was used and to whom it was served • Reports from customers of symptoms of physical illness 		

Sample Standard Operating Procedure for Food Recalls of USDA Commodity Food and Purchased Food

NOTE: The procedures described are general guidelines for school districts and may need to be modified according to the school district's policies.

Date issued:

Revision: *Number or letter designation*

Purpose: To identify the procedures and personnel responsible in the event of a food recall and to document the procedure to be followed.

Scope: This procedure applies to _____
(List **all personnel** by job title to whom this applies. Listing by title ensures that the procedure does not have to be revised and approved every time there is a personnel change.)

General: (Definitions and General Statements)

Hold - A time period used for investigation after a USDA commodity food has been identified as potentially unsafe. The hold process is unique to USDA commodity foods.

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

Physical segregation - Product is removed to a separate area of storage that will spatially isolate it from other foods.

School District Personnel responsible:

(List by title for each responsibility below)

Distributor contact _____

Documentation of training _____

Food safety coordinator for commodity foods _____

School district public communications contact person _____

Training on recall procedures _____

Procedures:

Responsibilities when a Food Recall Notice is received:

Personnel responsible will complete the assigned tasks described in the attached Food Recall Action Checklist.

(Add job titles to Food Recall Action Checklist under Person Responsible and attach the checklist to the standard operating procedure.)

Communication: Communication will be handled between the school district central office and school sites as follows:

(Example: Initial communication to school sites when a Food Recall Notice is received will be phoned directly to the contact person responsible at the site. A log will be maintained to document contacts by date and time. Any printed materials needed at the sites such as recall notices will be faxed to each school site principal's office.)

Contacts for public communications: The school district public communication contact person will handle all public communications.

(Include the school district communication contact person or other school district personnel responsible for public communications. Attach a copy of the district's policy and procedure for public communications.)

Product segregation: The recalled food product will be (physically/spatially segregated) by:

(Describe the procedure to segregate the recalled product. The procedure may be product type specific.

Example: Frozen product placed on hold will be placed in a plastic bag, securely taped, and placed on a separate shelf.)

Warning: Product placed in hold will be identified by:

(Describe the product identifier: A large sign, not less than 8-1/2" x 11", with the words "DO NOT USE" and "DO NOT DISCARD" will be securely attached to the product placed on hold.)

Requirements for on-site destruction of recalled product:

(Describe specific State or local requirements for disposal of food products. Some State public health departments require notification of all food products to be destroyed before any action is taken).

(Procedures need to be approved by at least two persons)

Approved _____ Date _____

Procedures for Conducting a Mock Food Recall in a School District

Purpose: The purpose of a mock food recall is to practice following the standard operating procedure to comply with a Food Recall Notice. The mock food recall will allow the school district and school sites to identify procedures that are unclear or inconsistent with best practices.

Directions for a Mock Food Recall

1. A mock food recall includes actions related only to the most critical food safety issues:
 - The immediate identification and segregation of the food product, and
 - Disbursement of information to persons possibly affected by consumption of the recalled product.
2. Using information from product records, determine a product to be used for the mock food recall. Identify the product code, lot number, and production date for the food product to be used for the mock recall.
3. Follow the school district standard operating procedure and the responsibilities at the administrative level and school site level as described in the Food Recall Action Checklist (Appendix 2).
 - Verify that the school district can correctly identify persons responsible for:
 - Coordination of a food recall, including contact with agencies, distributors, and manufacturers.
 - Public communications.
 - Verify that site managers can correctly complete the tasks described below.
 - Identify the recalled food product.
 - Count the recalled product in inventory.
 - Identify where and how to segregate the recalled food product.
 - Place warning labels on the segregated food product.
 - Notify site staff not to use the segregated food product.
 - Count the amount of the recalled food product used.
 - Account for all of the recalled food product by consolidating counts for product used and product in inventory.
 - Obtain information needed for public communications: whether the product was served, to whom it was served, and date served.
 - Identify how to obtain reports of health problems for submission to the school district central office and be aware that only health professionals should give medical advice.

Appendix 7

Problems with a Food Product

How to File a Complaint About USDA Commodity Food

USDA makes every effort to ensure that commodities provided through the Food Distribution Program are nutritious and of the highest quality. However, as in any food business, school districts may encounter a few problems such as foreign matter in canned green beans or inferior spaghetti packaging. When this happens, recipients may file a complaint. Some states prefer to have such complaints go through the State Distributing Agency (check with your State agency); otherwise send them directly to the USDA Food Distribution Division:

- Commodity Complaint Hotline: 800-446-6991
- e-mail: USDA-FNS-CommodityComplaints@fns.usda.gov
- Fax: 703-305-2420
- Or regular mail: US Department of Agriculture, Food and Consumer Service, Food Distribution Division, 3101 Park Center Drive, Alexandria, VA 22302

The delivery order number is needed by USDA to determine which vendor produced the product and resolve the complaint to the satisfaction of the recipient. It may be on the paperwork received with the commodity, or contact the State Distributing Agency to obtain it. **To seek a replacement, keep the product until USDA provides information on what to do with it. Do not discard USDA commodity products without prior written approval.**

In order for the USDA to investigate a problem with meat, poultry or egg products, the following information must be provided:

- The original container or packaging;
- The foreign object (the plastic strip or metal washer, for example); and
- Any uneaten portion of the food (refrigerate or freeze it).

When contacting your State agency or public health department regarding specific product recall the following information may be requested:

- A description of the problem;
- Date the product was received;
- Location of the product;
- How much product is involved;
- Delivery order number;
- Your name, address and phone number;

- The brand name, product name and manufacturer of the product;
- The size and package type;
- Can or package codes (not UPC bar codes) and dates;
- Establishment number (EST) usually found in the circle or shield near the “USDA passed and inspected” phrase;
- Name, location, and date the product was purchased.

THE BOTTOM LINE: If you sense there is a problem with any food product, don’t serve or consume it. When in doubt contact your State agency or public health department.

Source: U.S. Department of Agriculture, Food Safety and Information Service. May, 1996). Retrieved March 22, 2002, from www.fsis.usda.gov/oa/pubs/illness.htm

For additional information regarding complaints about USDA donated commodity foods, see: www.fns.usda.gov/fdd/MENU/COMPLAINTS/hotline.htm#What%20information
Retrieved March 22, 2002

Appendix 8

How to Read a Label to Identify a Food Product

CLUCK OF THE DAY FOODS

PO BOX 55, Anytown CA 12345
January 15, 2001

BREADED WHITE CHICKEN PATTIES

FULLY COOKED HEAT AND SERVE

INGREDIENTS.- White chicken, enriched wheat flour (niacin, reduced iron, thiamine mononitrate, riboflavin), water, dried whole eggs, enriched yellow corn flour (niacin, reduced iron, thiamine mononitrate, riboflavin), salt, sodium phosphate, soybean oil, modified food starch, spices, nonfat dry milk, leavening (sodium bicarbonate, sodium aluminum phosphate, sodium acid pyrophosphate), dextrose, enriched yellow corn meal (niacin, reduced iron, thiamine mononitrate, riboflavin), mono and diglycerides, dried whey, sugar, dried yeast, sodium alginate, natural flavor. Fried in vegetable oil.

HEATING INSTRUCTIONS:

	Deep Fat Fry 350°F.	Conventional Oven 400°F.	Convection Oven 375°F.
Frozen	3-3 1/2 min.	12-15 min.	8-10 min.

Cooking recommendations should be used as a guide only - variations in time and temperature may be required for variations in quantities heated.

209.2
01/15/01 18:26

INSPECTED FOR PUBLIC HEALTH U.S. DEPARTMENT OF AGRICULTURE P 399

KEEP FROZEN
20457

NET WT. 11/25 LBS.

25665

Lot number

Establishment number

Product Code number

Run or Code number

Note: In some cases the lot number may not appear on the label.

Notes

Notes