



Office for Elementary, Middle, Secondary and Continuing Education  
Office of School Operations and Management  
Child Nutrition Program Administration  
Room 55, Albany, NY 12234-0055  
Tel. (518) 473-8781  
Fax (518) 473-0018  
[www.nysed.gov/cm/cnms.htm](http://www.nysed.gov/cm/cnms.htm)

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**TO:** School Food Service Directors/Managers

**FROM:** Frances N. O'Donnell, Coordinator

**SUBJECT:** Hazard Analysis and Critical Control Point (HACCP) in Schools  
Reauthorization 2004

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.

The United States Department of Agriculture (USDA) is aware that schools are eager to develop their implementation plans and would like to receive guidance as soon as possible. They are working with staff from the Food and Nutrition Service (FNS) Food Safety Unit, the Food Safety Inspection Service, and the Food and Drug Administration to develop correct and practical HACCP knowledge and experience. USDA is 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 USDA develop HACCP guidance that is in line with local SFA capabilities and needs.

New York State recognizes 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. USDA plans to have HACCP guidance available in spring 2005 and envisions that SFAs will be in the process of implementing HACCP by the beginning of SY 2005-06.