



United States Department of Agriculture

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# **CREATING YOUR SCHOOL FOOD DEFENSE PLAN**

## **Why Build a School Food Defense Plan?**

Food defense is having measures in place to reduce the chances of someone intentionally contaminating the food used in your foodservice operation in order to harm children and cause panic, alarm, and distrust in our food supply. A food defense plan helps you identify steps you can take to minimize the risk of intentional contamination or tampering of food products in your school. A plan increases preparedness and will be particularly helpful during emergencies when stress is high and quick responses are essential.

Although food defense is different from food safety, they are similar in that both focus on preventing the contamination of food. Food safety deals with preventing the unintentional contamination of food products that can be reasonably anticipated based on the type of food product and how it is prepared. This knowledge is used to construct your School Food Safety Plan based on Hazard Analysis and Critical Control Points (HACCP) Principles. Creating a food defense plan does not require development of another HACCP-type document. Some of the information you may use will possibly exist in your School Food Safety Plan, Sanitation Standard Operating Procedures, and other documents such as emergency response procedures. Make sure to consult these documents for information.

## **Your School Food Defense Plan Components**

Your finished plan will contain the following components:

1. Assessment of current food defense measures
2. Identification and mitigation of risks
3. Emergency Contact List
4. Implementation and Maintenance of Plan

# **Four Easy Steps to Creating Your School Food Defense Plan**

## **Step 1 – Assess School Food Defense Measures**

## **Step 2 – Assemble the Pieces**

## **Step 3 – Complete Your Plan**

## **Step 4 – Use and Maintain Your Plan**

By completing these four steps, using the tools provided, you will have a food defense plan for your school. Keep in mind there is no “one size fits all” approach to creating a food defense plan and not all of the guidance contained in this document may be appropriate or practical for every school. Your plan can be as long or as short as is appropriate and you can modify and customize the strategies in the templates to fit your school.

## **Step 1 – Assess School Food Defense Measures**

In order to build a useful school food defense plan, you should assess current practices that you are already taking to reduce or prevent the risk for the intentional contamination of food within your school and school foodservice operation. Ultimately, like your School Food Safety Plan, each school should have a food defense plan written and adapted for the needs of that specific school. Think about how many schools are in your district. You may be able to group them into schools with similar characteristics, such as full preparation kitchens or satellite kitchens that do no onsite preparation.

Because some important aspects of food defense may be centrally managed, you may need to start with a central plan or a district plan. For instance, if you have central receiving at central kitchen and warehouse facilities, your school district plan will need to start there. Central kitchen operations have aspects that could make them particular targets, for example bulk mixing and processing provide a vulnerable spot to contaminate foods that would then be distributed to a large number of schools. You will want to be sensitive to identifying measures to reduce the vulnerabilities for central kitchens. Your district may also have consistent security policies and procedures, and possibly similar types of equipment (cameras, locks, etc.) throughout the district. You will want to develop components of your food defense plan addressing these topics in a consistent manner for the district.

It may be more efficient to develop a plan starting at the district level, and then work with staff at each school to customize each school building's individual plan.

Remember that your food defense plan will likely contain detailed information about your facilities and their operations. While it is important that those staff who will need to act on this information in an emergency have quick access to your current food defense plan, this information should remain secure and not be released to the public or posted on any file sharing site that does not have controlled access.

# Food Defense Plan

for

(Your district or school name) \_\_\_\_\_

## Step 1 – Assess School Food Defense Measures

The first step is an assessment of your current actions to prevent the intentional contamination of your food or foodservice operation. Read through the following checklists and answer each question (for either the district level or the school level) by putting a check mark in the ‘Yes’, ‘No’, or ‘N/A’ (not applicable) columns. You may need to consult with other staff or groups to help answer some of the questions. You will want to keep the results of this assessment confidential so that it does not provide a roadmap for those that might do harm.

### Outside Security

1. What food defense measures does your school have in place for the exterior of the building?

	Yes	No	N/A
The school grounds and/or buildings are secured ( <i>e.g.</i> , by locks, seals, or sensors) <b>during the school day</b> to prevent entry by unauthorized persons through:			
• Outside doors and gates			
• Windows			
• Roof openings			
• Vent openings			
The school grounds and/or buildings are secured ( <i>e.g.</i> , by locks, seals, or sensors) <b>after hours and on weekends</b> to prevent entry by unauthorized persons through:			
• Outside doors and gates			
• Windows			
• Roof openings			
• Vent openings			
Access to external refrigeration and/or storage facilities for school nutrition programs is restricted to designated employees only?			
Access to the following systems or controls for the following systems is restricted, controlled, or monitored ( <i>e.g.</i> , by locked door/gate or limiting access to designated employees, seals, equipped with a sensor device) to prevent access by unauthorized persons:			
• Heating, ventilation and A/C systems			
• Propane Gas/ Natural Gas			
• Water systems			
• Electricity			
• Chemical/disinfection supplies and systems			
The school has procedures for all visitors.			

## Inside Security

2. What food defense measures does your school or school foodservice operation have in place inside the building?

	Yes	No	N/A
There is an emergency lighting system in the school.			
The school has <u>monitored</u> security cameras.			
The school has an emergency alert system that is tested regularly.			
The locations of controls for emergency alert systems are clearly marked.			
All restricted areas ( <i>i.e.</i> , areas where only authorized employees have access) are clearly marked.			
Visitors are restricted to specific areas or accompanied by school personnel.			
Maintain inventory of keys to secured/sensitive areas of the school.			
Emergency exits are alarmed and self-locking doors are only able to be opened from the inside per local and state fire and building codes.			
The agency or authority that would serve as a first responder(s) based on specific emergency situations has been determined.			
There are procedures for communicating with students, parents, and with the media when necessary (for example, notices of incidents or a press release).			
There is a list of emergency contact information for local, state, and federal government homeland security authorities and public health officials.			
Someone in the school has called each emergency contact to verify they are the correct point of contact.			
The contact information is reviewed and updated regularly.			
There are procedures for notifying appropriate law enforcement and public health officials when our school receives a threat about food contamination, as well as when a member of the school community observes or suspects food tampering.			

## Foodservice Operation Security

3. Which of the following food defense procedures does your school foodservice operation have in place?

	Yes	No	N/A
<b>Foodservice Areas</b>			
Access to foodservice production areas is restricted to foodservice or other authorized employees.			
At least one authorized employee is required to be present in the foodservice area at all times when the area is not locked, for example			

during meal service set-up.			
Foodservice equipment (such as steam-jacketed kettles, steamers, choppers, hot/cold storage systems, or mixers) is monitored when in use to prevent someone from intentionally contaminating food during preparation.			
There are procedures to monitor all foodservice areas for signs of suspicious activity or unauthorized entry. This includes self-service areas such as buffets and salad bars, receiving, outside storage, and solid waste disposal.			
Our policy/policies prohibit foodservice areas to be used for 'special events' such as parent/teacher dinners or public events unless foodservice staff is present to monitor/supervise.			
There is a policy or policies that prohibit(s) outside foods and medications in foodservice areas (for example, personal foods or food brought in for storage or reheating by students or employees). An alternate storage place for such items is provided outside of foodservice areas.			
<b>Foods and Supplies</b>			
All food ingredients, food products, packaging materials, and other foodservice supplies are purchased only from reputable vendors.			
Vendors are required to have food defense plans or food defense measures in place as part of our bid specifications.			
All food suppliers, including central kitchens, are required to use tamper-proof packaging on foods they ship to our school(s).			
There are procedures that require employees to inspect food packages for evidence of tampering prior to use.			
<b>Food Storage</b>			
Access to food storage areas, including cold and dry storage areas, is limited (e.g., by locked door/gate or other) to essential employees.			
There are procedures that require all leftover food items be stored in tightly sealed (except during cooling), clearly labeled, and dated containers.			
There are policies and/or procedures that require food or ingredients that are not properly sealed and labeled be discarded.			
Security inspections of storage facilities are conducted regularly. Records of the security inspections results are maintained.			
The inventory of products is regularly checked for unexplained additions and withdrawals from existing stock.			
<b>Hazardous Materials/Chemicals</b>			
Hazardous materials/chemicals such as pesticides, cleaning materials, sanitizers, and disinfectants are received and stored securely outside of food preparation areas.			
The access to inside storage areas for hazardous materials/chemicals is restricted in some manner to allow use by designated employees only.			
A monthly inventory of hazardous materials/chemicals is maintained.			
Discrepancies in daily inventory of hazardous materials/chemicals are immediately investigated.			
<b>Emergency Situations</b>			

Specific guidelines or procedures exist for <u>reporting</u> suspected products or incidents.			
Detailed procedures exist for <u>responding</u> to actual incidents of product tampering or contamination.			
Procedures exist for recalling products and for quickly identifying and isolating recalled products.			
Procedures exist for safely handling and disposing of contaminated products. These procedures identify how and where to isolate suspected contaminated food or foodservice products.			
Procedures exist for providing safe and secure substitute meals, including procedures for feeding students at an alternate site(s).			
There is a list readily available of phone numbers of suppliers and alternate suppliers (for situations when regular suppliers are unable to provide product).			
An emergency supply of disposables for foodservice is available in case utensils, trays, etc. are contaminated, or in case items cannot be decontaminated.			
Policies and procedures exist for actions to take if water supply contamination is suspected. Alternate sources(s) of potable water, for example bottled water, have been identified.			
Arrangements have been made with local health officials to ensure immediate notification of the school if the potability of the public water supply is compromised.			

### Shipping and Receiving Security

4. Which of the following food defense procedures does your school foodservice operation have in place for handling shipments/receiving?

	Yes	No	N/A
<b>Shipping (outgoing) - central kitchens</b>			
Food defense procedures for handling outgoing shipments are in place.			
If applicable to operation, outgoing shipments are sealed with tamper-evident seals.			
The seal numbers on outgoing shipments are documented on the shipping documents.			
<b>Receiving (incoming) - central kitchens and school buildings</b>			
Access to loading docks is controlled to avoid unverified or unauthorized deliveries.			
Unsupervised access, either during work hours or off hours, by giving keys, codes, etc to suppliers/vendors, is not allowed.			
Advance notification from suppliers (by phone, e-mail, or fax) is required for all incoming deliveries.			
The loading and unloading of vehicles transporting food products or other materials used in the foodservice operation is closely monitored.			
Suspicious alterations in the shipping documents are immediately investigated.			

	Yes	No	N/A
All deliveries are checked against the roster of scheduled deliveries.			
Procedures are in place to handle unscheduled deliveries.			
Off-hour deliveries are not accepted.			
Prior notice of the delivery is required if off-hour deliveries are accepted.			
The presence of an authorized individual is required to verify and receive the delivery, if off-hour deliveries are accepted.			
Incoming shipments are required to be sealed with tamper-evident or numbered seals (and documented in the shipping documents). These seals are verified against the documentation prior to opening.			
Partial load shipments are sealed.			
Incoming shipments are checked at the receiving dock for evidence of tampering.			
All employees are provided training on identifying packaging that is acceptable and not acceptable.			
Policies and procedures are in place to reject food and chemical packages that are not acceptable, cannot be verified against delivery invoice, or contain unacceptable changes to shipping documents.			
Suppliers are required to have food defense measures to cover their facilities and transport of food.			

### **Handling Mail and Money**

5. Which of the following food defense procedures does the school foodservice operation have in place to handle mail and money?

	Yes	No	N/A
Mail handling is done in a room away from the foodservice operation.			
A policy exists to direct all incoming mail (from the U.S. Postal Service or from private mail services such as UPS, FedEx, etc.) to one central location.			
Mail-handlers are trained to recognize and handle suspicious pieces of mail using U.S. Postal Service guidelines. (Helpful information is provided at the following website: <a href="http://www.usps.com/news/2001/press/serviceupdates.htm">http://www.usps.com/news/2001/press/serviceupdates.htm</a> )			
Procedures are in place to check toilets, maintenance closets, personal lockers, and storage areas for suspicious packages.			
Employees are aware that the handling of money is a potential means of spreading dangerous contaminants. Money transactions are separate from the food preparation areas.			
A policy exists that requires cashiers to always wash hands after handling money and prior to preparing, serving, or handling food or foodservice equipment.			

## Personnel Security and Training

6. Which of the following food defense procedures does your foodservice operation have in place for ensuring that personnel adhere to and are trained in the security requirements?

	Yes	No	N/A
<b>Security</b>			
Background checks are conducted on all employees and vendors who will be working in foodservice areas.			
An updated employee roster is kept by management, i.e., who is absent, who the replacements are, and when new employees are being integrated into the workforce.			
Employees, visitors, and vendors are identified in some manner at all times while on the school premises.			
Procedures exist for dealing with an unauthorized person(s) in restricted areas, including restricted foodservice areas.			
Our school foodservice operation controls access by employees and vendors entering foodservice operation areas during <u>working</u> hours (e.g. coded doors, receptionist on duty, swipe card, etc.).			
Our school foodservice operation controls entry of employees into the school foodservice operation area during <u>non-working</u> hours (e.g. access limited by key card or code number).			
Our school foodservice operation controls entry of suppliers/vendors into the school foodservice operation area during <u>non-working</u> hours (e.g. access limited by key card or code number).			
A policy exists excluding personal items within food production or foodservice areas.			
Employee lockers are inspected on a regular basis.			
A procedure exists to account for all keys provided to current employees. Keys are marked 'Do Not Duplicate'.			
A procedure exists to account for all keys, uniform(s), and identification badges provided to former employees.			
Procedures exist to document reported foodborne illnesses and to track unusual absenteeism trends and unusual staff health conditions.			
A policy and/or procedure exists directing a roster be kept of employees' emergency contacts and necessary medical information should family be unavailable.			
<b>Training</b>			
Employees receive basic food safety training.			
There a schedule to conduct refresher training regularly.			
All foodservice employees receive training on food defense procedures as part of their orientation training.			
All foodservice employees receive training on food defense procedures as part of regular in-service update training.			
Employees are trained to use chemicals properly to prevent accidental food contamination and human exposure.			
Employees are encouraged to report signs of possible product contamination, unknown or suspicious persons in the facility, or breaks in the food defense system.			

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Employees are trained on how they should prepare and submit incident reports.			
Vendors and other non-foodservice staff, such as principals, teachers, or school nurses, are given a briefing on the potential for intentional contamination of food and the importance of food defense.			

## Step 2 – Assemble the Pieces

You can now build the second piece of your plan based on the checklist.

- The items to which you answered ‘Yes’ are the first piece of your plan and describe the actions you are currently taking to protect the food in your operation from intentional contamination.
- The second piece of your plan is to identify risks you need to address but have not yet addressed. Select at least one to three of the items in each category on the checklist to which you answered ‘No’ and that you think put you at greatest risk. Move those items to column 2 of the template below.
- You should determine actions or measures you could take to deal with each of the items to which you answered ‘No’. Put these actions in column 3. (See examples of some possible actions in Appendix A).

Area	Column 2 Identified Risk	Column 3 Action to Counter Risk
Outside Security		
Inside Security		
Foodservice Operation Security		
Shipping/Receiving Security		
Handling Mail and Money		
Personnel Security and Training		

## Step 3 – Complete Your Plan

### Completing New Actions Identified in Your Plan

In order to complete the actions identified in Step 2, designate the action and person or team responsible for developing the measures, policies or procedures. Have the person or team submit a timeline for completing the tasks. You can use a table like the one below to organize the information and include it in your plan.

Actions/Policies/Procedures	Person/team responsible for development	Proposed Completion Date

### Assigning Responsibilities

Individual employee's food defense responsibilities should be defined and documented in your plan. All employees should be familiar with the food defense plan and measures. Assign overall responsibility for food defense to a single employee, if possible, who has an understanding of the security requirements. Ensure that a back-up is assigned for that employee.

### Creating an Emergency Contact List

A key piece of your plan is a current list of names and phone numbers to contact during an emergency. In addition to school and school foodservice employees, current local, state, and federal government Homeland Security contacts and public health officials should be listed in the plan. Local law enforcement and FBI offices should also be included in the contact list. Update the list regularly. You may wish to keep a copy of this list near your phone(s) for ready reference.

Person, Agency or Organization	Phone Number
School Foodservice Food Defense Contact	
School Emergency Contact	
Local Police Department	
Local FBI Office Weapons of Mass Destruction Coordinator	
City/County Department of Health	
State Department of Health	
State Department of Emergency Response or Homeland Security	
USDA FNS Regional Office	
USDA FSIS District Office	
FDA Regional Office	
Vendors	
Other	

## Step 4 – Use and Maintain Your Plan

The final piece of your plan covers the implementation and verification. You should create a schedule and/or timetable for training on the plan and for testing, reviewing, and revising the plan on a regular basis. These schedules/timetables should be included as a piece of your plan.

### **Training Staff**

Train staff on all provisions of the plan. The purpose of food defense awareness training is to ensure that your employees know their responsibilities. Training should address topics like access control procedures, access to restricted areas, protecting critical components, and procedures for reporting suspicious activities. Understanding the threat of intentional contamination and the potential consequences should help employees consistently execute preventive measures, increasing the overall effectiveness of the plan. Encourage the “neighborhood watch” concept for the operation, “If you see something, say something”.

### **Testing the Plan**

Conduct drills at least quarterly to test and verify the effectiveness of the plan. Consider doing some daily or weekly checks, such as checking the status of entry ways that are to be locked; checking for any abuse of employee conduct by bringing personal items into operational areas; checking to see if hazardous material inventory records are being maintained; etc. You should document findings, for example in a table like the sample below, and then list corrective actions to prevent them from occurring again.

Date	Area Tested	Results	Signature	Corrective Action Taken	Date Action Taken	Signature

### **Reviewing and Revising the Plan**

Review your plan and revise it, as needed, at least annually or when there is a change in your operations. You may need to revise the plan to address changing conditions such as new equipment, changing vendors, adding a new food preparation process, contracting new services; adding a new technology; etc. You should document your review and revision, for example by using a table like the one below.

Date	Reason for Assessment	Signature

## **Include Food Defense in Food Recall Procedures**

You may already have Food Recall Procedures developed and included in some other plan in your operation. Review your recall procedures and determine if any updates, such as contacting local law enforcement, need to be made to address food defense concerns. If you do not have established recall procedures in place, resources are available from the Institute of Child Nutrition (ICN) at [www.theicn.org](http://www.theicn.org).

## **Securing Your Plan**

Determine locations for your food defense plan that are secure, yet easily accessible in an emergency. Electronic files should be shared with staff and emergency responders who need to be familiar with the plan and ready to respond to emergencies. However, precautions should be taken to keep all of your electronic files safe from those who might do harm with detailed information about your facilities and food defense activities. Never post any detailed food defense information on public websites. If you use file sharing sites for your plan coordination activities, be sure that the sites allow you to control access to the files.

## **Appendix A**

### **Potential Food Defense Actions**

Following are some examples of actions, strategies, or measures that could be used to counter risks identified in your checklist. The samples are not exhaustive; you will need to think about your specific operation and how the samples or similar actions could be modified to be practical, useful, and effective for your operation.

<b>Outside Security</b>
Create a diagram or map identifying foodservice related areas that are inside the building. Restrict access to this area to foodservice or other authorized personnel only. Inform the school administration of this policy. Post the diagram in appropriate locations in the school.
Create a diagram or map identifying foodservice related areas that are outside of the building. These areas include loading docks, parking lots, trash areas, outside food or chemical storage, or outside water supply. Monitor these areas regularly. Post the diagram in appropriate locations in the school.
Control access of all visitors and non-school employees (including vendors, truck drivers, pest control operators, and environmental health specialists/sanitarians). Require them to sign in at the main office, show picture identification, and explain the purpose of their visit.
Provide visitors with a visitor's badge. An authorized school representative should accompany them to the appropriate foodservice site. Visitors should not be left unsupervised in the school.
Do not leave back doors to the foodservice areas unlocked, even when foodservice staff is present. Doors should only be unlocked for immediate use when entering or exiting.
Invest in a system to restrict or monitor access for foodservice area doors to the outside. Examples include specialized locks, locks with keypads or card readers, or closed circuit television monitoring equipment.

<b>Inside Security</b>
Designate primary food defense contacts, either an individual staff person or a team. List the contact information for school food defense and their responsibilities. Verify the information regularly and update when needed. (See Step 3 for a sample contact list form.) Distribute the emergency contact list to appropriate school and school foodservice staff.
Establish a relationship with local authorities. In the case of bioterrorism, you might need to contact law enforcement officials, hazardous material (HAZMAT) representatives, environmental health specialists/sanitarians, health department officials, fire and rescue department representatives, or Federal regulatory agency representatives [for food safety (FDA or FSIS); for public health (FDA or CDC); or for homeland security (DHS)]. (Homeland security information can be found at : <a href="http://www.whitehouse.gov/homeland/contactmap.html">www.whitehouse.gov/homeland/contactmap.html</a> )
Compile an emergency contact list of authorities. Work with local law enforcement or district or county emergency management staff to create a comprehensive list. Verify and update emergency contact information regularly. This list should include the names and phone numbers for specific personnel from each agency or authority and their area of responsibility. (See Step 3 for a sample emergency contact form.
Create a diagram or map that defines the boundaries of all foodservice areas as well as locations of specific activities within the foodservice area. This should include self-service bars and school stores if applicable. Identify if access to the areas is limited or restricted to specific individuals.

Determine which foodservice areas should be restricted. Particular attention should be paid to critical production areas where products are uniformly mixed or produced in large batches. Restricted areas should also include food storage areas and chemical storage rooms. Define who is allowed within restricted areas and when.
Mark the restricted foodservice areas and develop procedures for controlling entry by non-foodservice employees. This policy should address the access of all non-foodservice staff such as school administrators, principals, teachers, parents, cleaning staff, vendors, repairmen, etc.
Keep storage areas locked and limit access based on job function. Monitor access to storage areas by issuing keys to only those who should have access. Areas should not be unlocked and unmonitored. Require staff to lock up after each use. For example, if custodians clean the foodservice or food storage areas, ask them not to unlock the areas and leave them unlocked while cleaning other areas located at a distance.
Use logs or another format to document inventory control. Take a physical inventory monthly and examine integrity of packaging.
Control access to your plan. Establish and monitor the locations of hard copies of the plan. Do not allow public access to electronic copies of your plan. Make certain that appropriate staff and other authorized users know where to find the plan, but limit large-scale distribution.

<b>Foodservice Operation Security</b>
Train employees to look for signs of wear, tear, and tampering before operating equipment.
Purchase all food ingredients, food products, packaging materials, and other foodservice supplies only from reputable suppliers who have appropriate permits or licenses. Priority consideration should be given to suppliers who furnish foods manufactured using food defense plans and measures. Obtain a signed agreement that suppliers will comply with applicable policies and procedures of the school's food defense management plan. Some questions you might ask to determine if a supplier is reputable: <ul style="list-style-type: none"> <li>• Are you currently licensed and inspected by state and/or federal health authorities? (Request a copy of the Certificate of Inspection and license or permit as applicable).</li> <li>• Do you have references? (Request contact information for references).</li> <li>• Do you have a School Food Safety Plan in place?</li> <li>• Do you have a Food Defense Plan?</li> <li>• Do you have a Crisis Management Plan in place?</li> <li>• Do you have a recall plan in place?</li> <li>• Can you provide letters of guarantee?</li> </ul>
Discuss food defense with your vendors to increase their understanding of the issues. Ask vendors if they have food defense policies and procedures in place.
Consider use of foods processed using alternative technologies (e.g., irradiated meat, ultra-pasteurized milk) because they may be less vulnerable to adulteration by certain contaminants
Develop procedures, including record keeping, for tracking all food and ingredients from manufacturer to table.
Document where ingredients and foods are stored and prepared in the foodservice operations. If an ingredient or food is determined to be contaminated, you need to be able to trace where that item is, where that item was, and where it came from. Trace foods by keeping thorough production and inventory records that include the lot and/or code numbers from ingredient packaging that are used and where the finished product was stored or served.
Protect the foodservice area by securing potential sources of contamination located in other parts of the school building, such as cleaning supplies storage and chemistry or biology labs.
Store hazardous materials in a separate locked area away from other inventory. Allow access to only those who need access.

Obtain Material Safety Data Sheets (MSDS) for hazardous chemicals from your supplier and make them readily available to foodservice staff. Follow manufacturer's instructions for use of hazardous chemicals.

Restrict access to critical central kitchen operations, such as bulk mixing or processing, to employees that receive additional training and/or background investigations. Arrange staff schedules so that a single individual is not left alone during bulk mixing or processing operations.

Monitor student activity in the cafeteria, especially at self-service areas.

#### **Shipping and Receiving Security**

Purchase materials only from recognized vendors. Accept receipt only for scheduled deliveries. Check packages against invoice and order forms and examine package integrity. Request that vendors ship materials in tamper-evident packaging.

All truck shipments should be secured by use of tamper-evident seals. Drivers should be trained regarding proper shipping documentation. Staff should be trained to assess the seals and ensure that they are in place.

Have drivers sign in and escort them at all times while inside the foodservice operation.

#### **Personnel Security and Training**

Create policy and procedures on how and when to conduct drills. It is important to periodically conduct drills to practice the communication process and to simulate a foodservice crisis so that you can evaluate how the crisis response part of your plan is working.

Have employees sign a statement documenting what training was taken and when. Provide refresher training on a regularly scheduled basis.

Schedule training using the Food and Drug Administration retail foodservice food defense materials: 'ALERT: The Basics' and 'Employees FIRST', to reinforce food defense behaviors. (See web link in Appendix C)

Consider the use of uniforms, hats, jackets, etc. to make foodservice employees distinctive.

## **Appendix B**

### **List of Resources**

Here is a list of sources of helpful information to consult when developing your school's food defense plan.

**Conference for Food Protection – Emergency Guidance for Retail Food Establishments**  
<http://www.foodprotect.org/guides-documents/>

**Food and Drug Administration (FDA) - ALERT: Basic Awareness of Food Defense Issues and Preparedness**  
<https://www.fda.gov/Food/FoodDefense/default.htm>

**FDA – “Employees FIRST: Food Defense Awareness for Front-line Food Industry Workers”**  
<https://www.fda.gov/Food/FoodDefense/default.htm>

**The Institute of Child Nutrition - web-based customizable version of A Biosecurity Checklist for School Foodservice Programs: Developing a Biosecurity Management Plan**  
<http://theicn.org/ResourceOverview.aspx?ID=69>

**USDA, Food and Nutrition Service (FNS) – Food Defense Resources**  
<https://www.fns.usda.gov/ofs/food-safety-resources>