

SUBJECT: Storing and Protecting USDA TEFAP Commodities; Food Safety and Food Defense

A. Purpose. This policy establishes the procedures to be followed in storing and caring for all USDA TEFAP commodities.

B. Scope. This policy applies to all state-contracted Recipient Agencies (RAs) and their warehouse(s) and storage facilities.

C. Authority. Title 7 CFR 250.14 (b).
USDA Policy Memo FD-107.

D. Contracts With Warehouses – By State-Contracted Recipient Agencies. Applies to any storage or warehouse space, other than the state-contracted warehouse, that is not owned by the state-contracted Recipient Agency.

1. Written Contract. State-contracted Recipient Agencies (RAs) that store TEFAP commodities in a commercial warehouse, or leased or donated warehouse space, must have a written contract for the warehouse(s). The state-contracted RA must provide the Bureau with a copy of each contract it has entered into with the warehouse for receipt and storage of USDA TEFAP commodities. Contracts with commercial warehouses must be in compliance with current USDA regulations. **The Bureau must receive a copy of the contract before commodities can be ordered for delivery to that facility.** A copy of each renewal and any new contracts must be provided to the Bureau. Exhibit R provides a prototype contract with a commercial warehouse.
2. Change of Warehouse. Whenever a state-contracted RA changes warehouses, it must notify the Bureau immediately, in writing, so that action can be taken to divert orders in progress to the new warehouse. See Policy 250.14-1, Paragraph D. The Bureau will make every effort to have USDA divert as many shipments as possible. However, there is no guarantee that USDA will be able to do so. The RA is redirecting to the new warehouse any shipments that arrive at the old warehouse. The RA must bear any expenses associated with these diversions.

E. Storage Periods.

1. Shelf Life. Shelf life is the length of time from pack date that commodities can be stored at acceptable temperatures without affecting quality. Commodity shelf life recommendations are currently stated as “best if used by” dates (Exhibit L). USDA recommends that RAs have no more than a six-month supply of commodities on hand.
2. Expiration and Use-by Dates. “Expiration” dates and “use-by” dates are the last

dates the manufacturer recommends a food item be consumed to ensure peak quality and nutrient retention. USDA TEFAP donated food that is past its expiration date or its use-by date must **not** be distributed to program recipients.

3. Best-If-Used-By (BIUB) Date. A “best-if-used-by” (BIUB) date is the last date a food item will be at its peak, in terms of flavor and quality. At some point after that date, the product will begin to undergo changes in taste, color, texture, and/or nutrient content. However, the product may be wholesome and safe to consume, and retain most of its nutrient value, long after the BIUB date. BIUB dates are intended only as useful guidelines. Some TEFAP commodities may deteriorate more quickly and some may last longer than the times recommended. But, because many factors can shorten the useful life of a commodity such as improper handling and inadequate storage temperatures, the inventory control method of “first-in, first-out” should be practiced by those responsible for TEFAP commodities and inventories and distribution. **As stipulated by USDA in Policy Memo FD-107, USDA TEFAP food that is past its BIUB date must not be distributed to program recipients.** RAs, their sub-distributors, and those sub-distributors who further sub-distribute must consider BIUB dates in managing their USDA donated food inventories, and distribute USDA donated foods in a manner that allows the food to be consumed by the BIUB date. Failure to distribute USDA donated food to program recipients prior to the expiration/BIUB date may be considered a loss of USDA donated food.
4. “Sell-by” Date. The “Sell-by” date is the date by which the manufacturer recommends that a store sell the food product, and is not necessarily a reliable indicator of how long it may retain its wholesomeness or nutritional value.

F. Conventional Storage Practices.

1. Monitoring Storage Temperatures. The state-contracted RAs and warehouses are responsible for any loss of TEFAP commodities that happens due to negligence. The state-contracted RAs should monitor and record storage temperatures on a daily basis year round. Although the Bureau cannot require the daily year round reading of storage temperatures, USDA-SERO considers all losses that result because of inadequate temperature control to be caused by negligence and hold the RA or warehouse responsible for the commodity loss. **This includes losses due to the failure of an alarm system.** Therefore, the burden of proof is on the RA or warehouse to demonstrate that the loss was not caused by its negligence.

Further, when reporting a loss, the state-contracted RA or warehouse must include a temperature chart with the loss claim report. Accordingly, Exhibit M is a suggested instrument for recording the storage temperatures on a daily basis. The purpose of the temperature chart is to help the state-contracted RA and warehouse maintain the proper temperatures in their TEFAP commodity storage facilities. If there is a significant change in temperature, the RA or warehouse can take appropriate action to correct the problem and avoid deterioration or loss of stored TEFAP commodities.

2. Practicing First In, First Out (FIFO). Commodities are to be stored so that the commodities with the **nearest expiration/BIUB dates** are in front and used first, followed by USDA foods with the **oldest pack dates**. With the increasing number of USDA commodities having commercial labels, contract numbers, pack dates and expiration/BIUB dates may not appear on each case. When commodities are received, RAs may choose to write the received date on the product if no other date is present. If commodities are taken out of the case and stored, each can/box/container must be marked with the received dates if pack dates or expiration/BIUB dates are not available. Along with practicing FIFO, the state-contracted RAs and warehouses should store like TEFAP commodities together and alphabetize or organize by number for inventory purposes.
3. Pest Control. Insects and rodents are particularly attracted to the conditions and the commodities in dry storage areas. Monthly extermination treatments should be applied by a licensed professional exterminator with an excellent reputation for safe application of chemicals. When contracting for service, the state-contracted RA or warehouse must be certain that the company meets local government requirements for safety and compliance with Federal and State regulations. Good management practices that will protect the dry storage area from continued infestation are:
 - (a) Inspect incoming shipments for contamination.
 - (b) Inspect and repair holes in walls, floors and ceilings.
 - (c) Inspect and repair holes in windows and screens.
 - (d) Dispose of empty cases and cartons (they invite bugs to breed).
 - (e) Clean up spilled food immediately.
 - (f) Sweep and sanitize the dry storage area each week.
 - (g) Post and follow a cleaning schedule.
 - (h) Keep the exterior of the storage area free of bushes, weeds, and other debris.

G. Storage of TEFAP Commodities.

1. Storing and Stacking. For good air circulation, store TEFAP commodities six inches off the floor on vented shelves and/or pallets and no closer than two inches between shelves and walls. The spaces below shelves and next to walls and movable pallets should allow access to the storeroom floor for thorough cleaning. Unopened cases of TEFAP commodities may be stored on shelves or stacked on pallets, but once opened the cases must be discarded and the cans marked with the pack date for FIFO.

Unopened large bags (50 - 100 lbs.) of rice, flour and cornmeal are to be cross stacked to prevent sliding off the pallets and lower shelves. Once opened, they must be transferred to sanitary cans or bins.

2. Temperature Control.

- (a) Dry (Regular). Ambient temperature with an exhaust fan. Applies to canned items. (Recommended - below 80° F.)
- (b) Dry Special. Dry special commodities include grains, cereals, powdered milk, etc. (50°-70°F at 50% humidity or less.) Without proper ventilation, the dry storeroom can become too hot and humid. Permanent placement of a wall thermometer in the warmest section of the dry storage area, along with a temperature storage chart, will lessen the burden of temperature monitoring and prevent commodity spoilage.
- (c) Cooler. Commodities that must be placed in a refrigerated storage area are **perishable** commodities. (Must be maintained at a temperature of 35° - 41°F.) A reliable, rust resistant and non-breakable refrigerator thermometer must be placed in the warmest area of the refrigerator. The area can be located by placing a thermometer in different locations and noting the variations in temperature until the warmest part is found. Remote reading thermometers designed for use in commercial reach-in and walk-in refrigerators allow the temperature to be read from outside the refrigerator.
- (d) Freezer. The freezer storage area must be maintained at -10°F to 0°F. If a power outage causes a complete shutdown of the freezer, **food should never be refrozen**. It must be inspected by the Department of Agriculture and Consumer Services, Division of Food Safety, Food Safety Compliance (850-245-5520), and if destroyed, a commodity loss report submitted. If the outage is discovered before the food is completely defrosted, it can be used.

H. Guidance for Smaller Recipient Agencies.

- 1. Storage Facilities. RAs without separate storerooms **must** practice the same general guidelines as outlined above. Even facilities with homestyle pantries and kitchen cabinets must:
 - (a) Keep food safe from theft (a locked cabinet).
 - (b) Store food separately (label cabinet or shelf).
 - (c) Monitor temperature (use thermometer and temperature chart).

- (d) Practice FIFO by storing, stacking and labeling food by pack date or by received date if pack date is not available.
 - (e) Use acceptable containers and markers for repacking and labeling bulk foods.
 - (f) Keep appropriate records and inventory.
2. Technical Assistance. Any state-contracted RA or sub-distributor that has questions about their storage facilities may contact the Bureau of Food Distribution for assistance.

I. Inventory Records for USDA TEFAP Commodities.

1. Recordkeeping of TEFAP Commodities Received. A major activity of receiving USDA TEFAP commodities is keeping an accurate record of the commodities received. The number and type of records that should be kept depend on the size of the state-contracted RA, degree of automation, and type of warehousing and delivery system used. The state-contracted RA's records are developed from information provided by the Bureau and the warehouses, available on the Electronic Ordering System (ECOS), etc. These include:
- (a) Commodity Offer and Acceptance Form, if provided by the Bureau.
 - (b) Requisition By PCIMS/Status Reports (ECOS –Exhibit Q)
 - (c) Warehouse Order Forms. (Warehouse)
 - (d) Delivery invoices/bills of lading. (Shipper)
2. Commodity Control Log. The above documents should be used to develop a Commodity Control Log to track the receipt of TEFAP commodities.
3. Perpetual Inventory Record. Once a quantity of TEFAP commodity has been received into the state-contracted RA's facility, the RA should monitor or track the distribution through a perpetual inventory record. Record should include:
- a. Name of the commodity received and quantity (number of cases).
 - b. Delivery Order Number (DO#).
 - c. Date the commodity was received.
 - d. Number of units received (pack size times number of cases received).
 - e. Number of Units distributed, discarded, or destroyed.

- f. Book balance of inventory on hand.
- g. Reconciliation of records quantity to physical count along with an explanation of any adjustments made.

J. Food Safety. Recipient Agencies should develop written Standard Operating Procedures concerning Food Safety issues. Review and revise your overall food safety program periodically to ensure the information is current. The SOP should include provisions on:

1. Handwashing.
2. Proper receiving and storage procedures for all food items.
3. Temperature control; maintaining all storage facilities at proper temperature.
4. Record documentation and maintenance.
5. Training of employees and volunteers on proper food safety procedures.

K. Food Defense. Food defense and food safety are not the same thing. Food defense focuses on protecting the food supply from intentional contamination or tampering while food safety addresses the accidental contamination of food products. All Recipient Agencies are responsible for protecting the health of those they're serving by safeguarding the food items and strengthening the safety of their foodservice and distribution operation.

1. Who's at risk. Anyone handling commodities is at risk for potential contamination. This includes warehouses, public and private schools, residential child care institutions, central kitchens, food banks, etc.
2. What foods are at risk. Based on vulnerability assessments conducted by the USDA Food and Nutrition Service and the Food and Drug Administration, the following items have been found to be particularly vulnerable: ground beef, chicken nuggets, produce, canned food, peanut butter, cooked seafood, fruit juice, flour, deli salad, honey, infant formula, breaded food, baby food, milk, yogurt, ice cream, soft drinks, and bottled water.
3. Common features of higher risk foods. Features that characterize higher risk foods include: large batch size (large number of servings); short shelf-life (rapid turnaround at retail and rapid consumption); uniform mixing of contaminant into food; and accessibility to the facility.
4. Vulnerability points. Contamination can take place during production, packaging, transportation, storage, preparation and service.
 - (a) Central kitchens – potential vulnerable points include: receiving and storage; food preparation; and access to the facility.

- (b) Warehouses – potential vulnerable points include: receiving; storage; personnel; and access to the facility.
- (c) Food banks – potential vulnerable points include: receiving; storage; personnel; and access to the facility. Food banks may become targets to incite fear; their products have a relatively short shelf-life; and tracking methods for products and personnel may be inadequate.

L. Steps to Protect Your Operation. There are steps that you can take to minimize the risk of intentional contamination.

1. Restrict access to storage areas, food handling areas, and locker rooms.
2. Restrict entry to the establishment/area to only those who have a valid reason.
3. Protect perimeter access: limit number of entrances; account for all keys; have proper interior, exterior and emergency lighting.
4. Look for evidence of tampering.
5. Investigate damage, loss and discrepancies.
6. Check seals. Obtain and verify seal numbers on delivery vehicles.
7. Establish receiving and release procedures for commodities.
8. Investigate missing or extra stock.

M. Food Defense Plan. Each Recipient Agency should carefully examine their operation and develop a food safety/food defense plan for their agency. A food defense plan helps identify steps that can be taken to minimize the risk that food products in your establishment will be intentionally contaminated or tampered with. The food defense plan should be maintained up to date, reviewed and tested annually to determine its effectiveness and applicability, vulnerabilities, what works, changes needed, ways to improve it, etc.

1. To develop a Food Defense Plan:
 - (a) Establish a biosecurity management team.
 - (b) Develop and conduct an initial food defense vulnerability assessment. When completing the assessment, consider both potential internal and external threats. Keep the results of the assessment confidential. Exhibit X provides a template for an assessment instrument.
 - (c) Develop a Food Defense Plan. Once you have identified the areas of concern

or procedures that may be more vulnerable than others, determine cost-effective preventive actions that can be taken to minimize the vulnerabilities. Exhibit X should help you write your Food Defense Plan. At a minimum, the Food Defense Plan should address:

- (1) Storage security
 - (2) Shipping and receiving security
 - (3) Water and ice supply
2. Implement the Food Defense Plan. Once written, review it thoroughly to ensure that it is functional and up-to-date. Exhibit X provides questions that can assist you in the review of your plan.
 3. Assign responsibilities. The plan should identify each employee's food defense responsibilities.
 4. Staff training. Train staff and volunteers on all provisions of the plan to ensure staff and volunteers to ensure everyone knows their responsibilities on a regular basis. Training should include access control procedures, protecting critical components, and procedures for reporting suspicious activities.
 5. Test and exercise the Plan. At least annually, test and verify the effectiveness of the plan. Maintain documentation of findings and the corrective action implemented to prevent from occurring again.
 6. Food Defense Plan evaluation and revision. Review the plan and revise it, as needed, at least annually or if anything changes in your operation.
 7. Emergency contact numbers. Maintain a list of the current local, state and federal government points of contact that should be listed on the plan. Include local law enforcement on your list of names and telephone numbers.

N. References. The following are good resources for information or assistance in developing a Food Safety and/or Food Defense Plan. Although these materials may have been developed specifically for school food service operations, much of the information is applicable to all agencies handling USDA commodities.

1. USDA, FNS, "A Biosecurity Checklist for School Foodservice Programs – Developing a Biosecurity Management Plan", Rev. March 2004.
<http://healthymeals.nal.usda.gov/hsmrs/biosecurity.pdf>
2. National Food Service Management Institute, "Template for Developing a School Food Safety Program", 2006.

http://www.nfsmi.org/Information/school_fs_program.html

3. The National Food Service Management Institute, Biosecurity Checklist for School Food Service Programs, allows you to customize USDA's Biosecurity Checklist for School Foodservice Programs" for your own program. Allows you to develop your own program using the forms and templates provided.

<http://foodbiosecurity.nfsmi.org/index.php>

4. Food and Drug Administration, Food Defense and Terrorism, Food and Cosmetic Security Preventive Measures Guidance.

<http://www.cfsan.fda.gov/~dms/defguids.html>

- (a) Retail Food Stores and Food Service Establishments. In addition to retail food stores, provides guidance to operators of food service establishments such as food banks and church kitchens

<http://www.cfsan.fda.gov/~dms/secgui11.html>

- (b) Importers and Filers: Food Security Preventive Measures Guidance. This guidance is designed to assist operators of food storage warehouses as well as food importing establishments and filers. It identifies the kinds of preventive measures that they may take to minimize the risk that food under their control will be subject to tampering or other malicious, criminal or terrorist actions.

<http://www.cfsan.fda.gov/~dms/secguid7.html>