



# AGRICULTURAL PRODUCERS' TOOLKIT

Bringing the Farm to School

# Welcome

Session 2





Bringing the Farm to School

## Growing for Schools

Module 4 – Section E+F (Food Safety + Regulations)





## Section E: Navigating School Food Safety Standards (Crop)

# Understanding School Food Safety Requirements



Photo: National Farm to School Network

## School Product Specifications

- Product & variety
- Quality standards & size
- Quantity
- Post-harvest handling—freshness
- Packing & labeling
- Traceability
- Other terms and conditions
- ***Food Safety—as a vendor requirement***

# Other Buyers' Food Safety Requirements



# FSMA, GAPs, HACCP: What's the Difference?



# The Food Safety Modernization Act (FSMA)

- FSMA includes seven rules:
  - **Produce Safety Rule**
  - Preventive Controls for Human Food
  - Preventive Controls for Animal Food
  - Foreign Supplier Verification Programs
  - Accreditation of Third-Party Auditors/Certification Bodies
  - Sanitary Transportation of Human and Animal Food
  - Prevention of Intentional Contamination/Adulteration
- First ever mandatory federal standard for growing, harvesting, packing, and holding of fresh produce
- Focused on prevention of food safety issues and encompasses the entire food system



# Comparison of Produce Safety Rule and Good Agricultural Practices (GAP)

The Food Safety Modernization Act (FSMA):  
Produce Safety Rule sets forth requirements to reduce microbial contamination in produce that causes foodborne illness

Good Agricultural Practices (GAPs):  
Voluntary audits to verify safe practices & minimize risks of microbial hazards on the farm

## Produce Safety Rule

### Food & Drug Administration – FDA

- Mandatory regulations
- Regulations issued by Food & Drug Administration
- Inspection of farms by regulatory body (by state departments of agriculture and/or FDA)
- No cost for inspection
- Does not require Farm Food Safety plan
- Does not require recall and traceability program

## Good Agriculture Practices Program – GAP

### United States Department of Agriculture – USDA

- Voluntary program that farmers choose to participate in
- Guidance document
- Audits of farms are done by paid auditors and need to be renewed annually
- Farmers pay for audits
- Requires Farm Food Safety plan
- Requires recall and traceability program



## Produce Safety Rule (PSR) Status Determination

### EXEMPT

Must meet at least ONE of the following requirements:

- Average annual produce sales are less than \$29,245 on a rolling three-year average basis (this is sometimes referred to as the “de minimus” exemption)
- Produce grown is listed as “rarely consumed raw” in the Produce Safety Rule
- Produce is only grown for personal, family, or on-farm consumption
- Produce undergoes a commercial processing “kill step” (must adequately reduce the presence of microorganisms of public health significance)

### QUALIFIED EXEMPT

Must meet **BOTH** of the following requirements:

- Average annual total *food* sales are less than \$584,908 on a rolling three-year average basis
- **AND**
- The majority (more than 50%) of sales are to *qualified end users*

*Food* – This includes both human food and animal feed (e.g. produce, grain, hay, meat, dairy, eggs, value-added products, processed foods, and baked goods).

### SUBJECT TO PSR (COVERED)

- If you don't meet the exempt or qualified exempt requirements listed above, then your farm is likely covered
- Average annual produce sales OR *food* sales are greater than \$584,908 (if the total food sales include more than \$29,245 in produce sales)
- Covered farms are subject to the requirements of the PSR



# Where to Get Help with Food Safety

- County Health Department
  - Montana County Sanitarians
  - <https://dphhs.mt.gov/publichealth/fcss/countytribalhealthdepts>
- Montana Department of Agriculture - Produce Safety Program
  - Grower Training courses
  - <https://agr.mt.gov/Produce-Safety-Program>
- County Extension Offices
- Montana Department of Livestock
  - Meat, poultry, dairy, eggs
- NCAT ATTRA Food Safety page
  - Podcasts, tutorials, videos, resources
- USDA Agriculture Marketing Service
  - GAP Auditor list



Photo: National Center for Appropriate Technology



HOME



ABOUT FARM TO SCHOOL



SCHOOLS



GROWERS



STUDENTS & PARENTS



FARM TO PRESCHOOL

# Tips, Tools and Guidelines for Food Distribution and Food Safety

## Tips, Tools and Guidelines for Food Distribution and Food Safety

 [Download complete publication](#) (34MB)

Due to the large size of this file, we have separated the sections into individual files for easier downloading.

 [FTS-Tips-cover-TOC](#)  
Cover, Table of Contents and Credits (2.7MB)



## Section 2: Food Safety

 [Download Section 2](#) (6MB)

-  [Developing a Food Safety Plan for Your Fresh Produce Operation](#) (1.6MB)
-  [Glossary of Food Safety Terms](#) (305k)
-  [Fresh Produce Handling Tips for Schools](#) (395k)
-  [Fresh, Healthy and Safe Food: Best Practices for Using Produce from School Gardens](#)  
section2-fresh-healthy-safe-food(3.76MB)

## Food Safety Log and Worksheets

The following worksheets are intended to serve as templates pertaining to documentation and record keeping occurring within a typical fresh produce food safety program.

**The following are included in this file:**

- Irrigation Spray Water Treatment Log
- Worker Training Log
- Fertilizer / Compost / Manure Applications Log
- Field / Packing Shed Restroom Cleaning and Service

# Food Safety Planning Tools for Accessing School Markets

## Digging Deeper Resources

- ATTRA Produce Safety Tutorial
- Farm-Based Food Safety videos
- Farmer Regulatory Toolkit Understanding Food Safety Regulations and Performing a Self Assessment
- Tips, Tools, and Guidelines for Food Distribution and Safety, OK Farm to School
- The Seven Principles of HACCP, University of Nebraska—Lincoln



[ATTRA Podcast: "A Conversation with Atina Diffley"](#)



*Click the above photo to access the podcast*



**ATTRA Video: The Internal GAP Audit Overview**

# Applied Activity – Producer Food Safety Communication Tool

## Worksheet 4E: Communicating your Food Safety Protocols to School Food Authorities – Risk Assessment

The food safety risk assessment is a tool you can use to :

- Assess your risk management activities and
- Describe how you manage risks to buyers to demonstrate how you address food safety issues on your farm.

**Local Produce Procurement Checklist**

The following is a list of questions for you to ask of your farmer/vendor when purchasing farm fresh produce. Keep these forms in your files as part of your record keeping.

Name of Producer/Farm:

Address:

City:

Telephone:

Zip:

E-mail:

Products to be purchased:

Production and Handling Practices	Yes	No	N/A
What is irrigation source? <input type="checkbox"/> Well <input type="checkbox"/> Stream <input type="checkbox"/> District canal <input type="checkbox"/> Pond <input type="checkbox"/> Municipal <input type="checkbox"/> Other			
If well water is used, is well protected from contamination?			
Is manure applied at least 120 days prior to harvest? If compost produced according to USDA standards is used, is it applied at least 90 days prior to harvest?  <i>These are the USDA National Organic Program rules, which have been recently adopted in the new GAP standards. Compost that wasn't made according to these standards is considered "manure."</i>			
Is land use history available to determine risk of product contamination?			
Is the field protected from potential run-off from animal confinement or grazing areas?			
If portable toilets are used for workers, are they situated in a way that prevents field contamination from waste-water?			
Is dirt, mud, or other debris removed from the product before packing?			
Is rinse (potable) water source tested at least once a year and results kept on file?			
Are food product contact surfaces washed, rinsed and sanitized before using?			
Are harvesting baskets, totes, or other containers kept covered and cleaned (with potable water) and sanitized before using?			
Is storage facility well maintained and clean, with designated areas for food products and non-food items?			
Is transport vehicle well maintained and clean, with designated areas for food products and non-food items?			
Are products kept cool during storage and transport? If ice is used is it from a potable water source?			
Are workers trained in safe food handling practices?			

(Continued on next page)



Are workers instructed not to work if they exhibit signs of infection (e.g., fever, diarrhea, etc.)?			
<b>Ordering Procedures</b>			
How far in advance will producer inform you of product availability?			
How should orders be placed? (phone, fax, or e-mail)			
What are procedures if producer cannot fulfill requested order – (due to lack of volume or quality of product)?			
Has the price and unit of costing been negotiated?			
<b>Delivery Procedures</b>			
Timing of delivery			
Frequency of delivery			
Volume of delivery			
<b>Product Specifications</b>			
Desired quality or size?			
Other desired specifications?			
What substitutes are acceptable?			
What is inappropriate in terms of packaging and/or product condition?			
<b>Payment Procedures</b>			
Amount of lead time required by accounting office in order to add vendor?			
What is the timing for payment of invoices?			
<b>Insurance</b>			
Is insurance required? Does the vendor have liability insurance? If so, how much is the coverage?			

**Sample Receipt From Grower:**

Date: \_\_\_\_\_  
 Received by: \_\_\_\_\_  
 Donated: \_\_\_\_\_ Purchased: \_\_\_\_\_ Purchase price: \_\_\_\_\_  
 Description and amount of product purchased: \_\_\_\_\_  
 \_\_\_\_\_  
 Date harvested: \_\_\_\_\_  
 Harvest location: \_\_\_\_\_ Lot # if available \_\_\_\_\_  
 Name of grower: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Phone: \_\_\_\_\_ E-mail: \_\_\_\_\_

Reference: Iowa State University Extension, *Checklist for Retail Purchasing of Local Produce*  
<http://www.extension.iastate.edu/Publications/PM2046A.pdf>



# Rules, Rules, Rules

- **37.111.842 (Food Service Requirements for Schools)**
  - Requires schools to follow MT retail food rules (37.110.2)
  - MT has adopted the FDA 2013 Food Code
- **Retail Food License**
  - Allows food to be sold/served to a consumer
  - Plan reviews, applications, and inspections are handled at the local level; licenses are issued by DPHHS
  - Annual renewal
- **Retail Food Licenses in Schools**
  - Most schools have a license
  - 37.111.842 states that schools only serving students and staff are not required to hold a license
  - Even without a license, schools must follow MT retail food rules (37.110.2)
- **Tribes may have different rules- check with tribal sanitarian**



# Approved Source

**Food Code states food must come from an “approved source”**

- **"Approved"** means acceptable to the REGULATORY AUTHORITY based on a determination of conformity with principles, practices, and generally recognized standards that protect public health.
- **What is an approved source?**
  - Meat that has a state or federal mark of inspection (Dept of Livestock)
  - Milk and egg products that meet food code rules. Production regulated by Milk and Egg Bureau, Dept of Livestock
    - Milk- Grade A pasteurized
    - Eggs- received at 45F, and at least grade B
  - Produce from a licensed produce dealer or is GAP certified (Dept of Ag)
    - Other methods may determine produce “approved”

## Your Local Sanitarian

- The person performing the retail food inspection of the school
- A great resource for navigating food rules and regulations
- Cross jurisdiction between Dept of Livestock and Dept of Ag
  - retail vs wholesale can be a bit confusing



## **Section F: Navigating School Food Safety Standards (Animal Protein)**

# Meat Inspection Myths

- Only USDA inspected meat can go to schools, daycares, pre-K programs...  
— True or False
- USDA meat is safer than State of Montana inspected meat  
— True or False
- Meat from uninspected slaughter can go to schools if it is further processed under inspection  
— True or False
- We'll dig in deeper and discuss...

# Where to Get Help with Food Safety (General)

- County Extension Offices
  - and State Specialists
- Meat Trade Associations
- Local Food NGOs
- State Departments of Agriculture
- State Departments of Livestock
- Niche Meat Processor Assistance Network (NMPAN)



Photo: National Center for Appropriate Technology

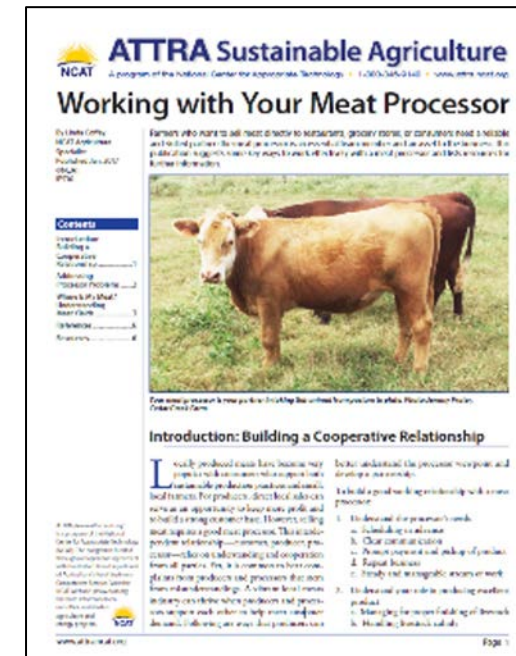
# Meat – School Sales and Food Safety Regulations

## Agencies responsible for establishing the rules and regulations

- USDA Food Safety and Inspection Service(FSIS)
- Department of Health and Human Services (DHHS)
- Food and Drug Administration (FDA)
- USDA Food and Nutrition Service (FNS)
- State entities implementing Federal minimum-standards



[Click link for resource](#)



# Meat Food Safety Entities - Montana Focus

- USDA-FSIS operating in the state
  - six to eight USDA inspected plants in state (inventory changes)
- Montana Department of Livestock- Meat and Poultry Inspection Bureau
  - <https://liv.mt.gov/Meat-Milk-Inspection/Meat-and-Poultry-Inspection/>
  - twenty +/- MDOL inspected plants in state (inventory changes)
- County Health Departments/Sanitaricians
  - Retail establishments and retail exempt further processing

# Inspection Matters

- Meat products sold to schools **MUST** be inspected.
- State (MDoL) or Federally (USDA) inspected meat can both be sold to schools!
- Meat can move between facilities and can change inspection status (in one direction).

Let's consider these scenarios...



# Inspection Matters

Scenario: a local butcher buys primal cuts from a state inspected plant for further processing and retail sale in her shop, which is inspected by the local sanitarian. Can she grind and make patties from this inspected beef for a local school?

# Inspection Matters

Scenario: a state inspected plant processes area cattle for a school. On occasion, he uses purchases USDA inspected trim from a regional plant to balance fat content or round out a small portion of a ground beef order. Can he sell this meat to a school?

# HACCP is the Foundation of Meat Safety

- Essentially, all food safety requirements for meat that is sellable to schools is the processor's responsibility
- Inspected facilities have HACCP plans for slaughter and all retail products
- Inspected facilities follow strict labeling rules
  - Inspection stamp/bug
  - Ingredients and allergens
  - All label information must be pre-approved
- Approved labels should meet school requirements
- Package volumes may vary to meet school needs (e.g. bulk)



# Food Safety and Transportation

- Unbroken cold-chain
- Logged or verified temperatures during deliveries
- Lower tech options are okay, if temp is recorded, and conditions are sanitary
- Must deliver directly between processor and school unless you have a licensed meat depot



Photo: School House Meats delivery van; MSU Extension.

# Food Safety and Quality on the Farm or Ranch

- Quality Assurance Programs for Producers
  - Beef Quality Assurance
  - Pork Quality Assurance
  - Other self audits and good practice guides
- Raise healthy livestock, use and administer pharmaceuticals correctly
- Handle livestock humanely
- Deliver un-stressed animals to your processor
- Deliver animals to your processor as clean as possible
- **These types of practices are the beginning of food safety and quality**



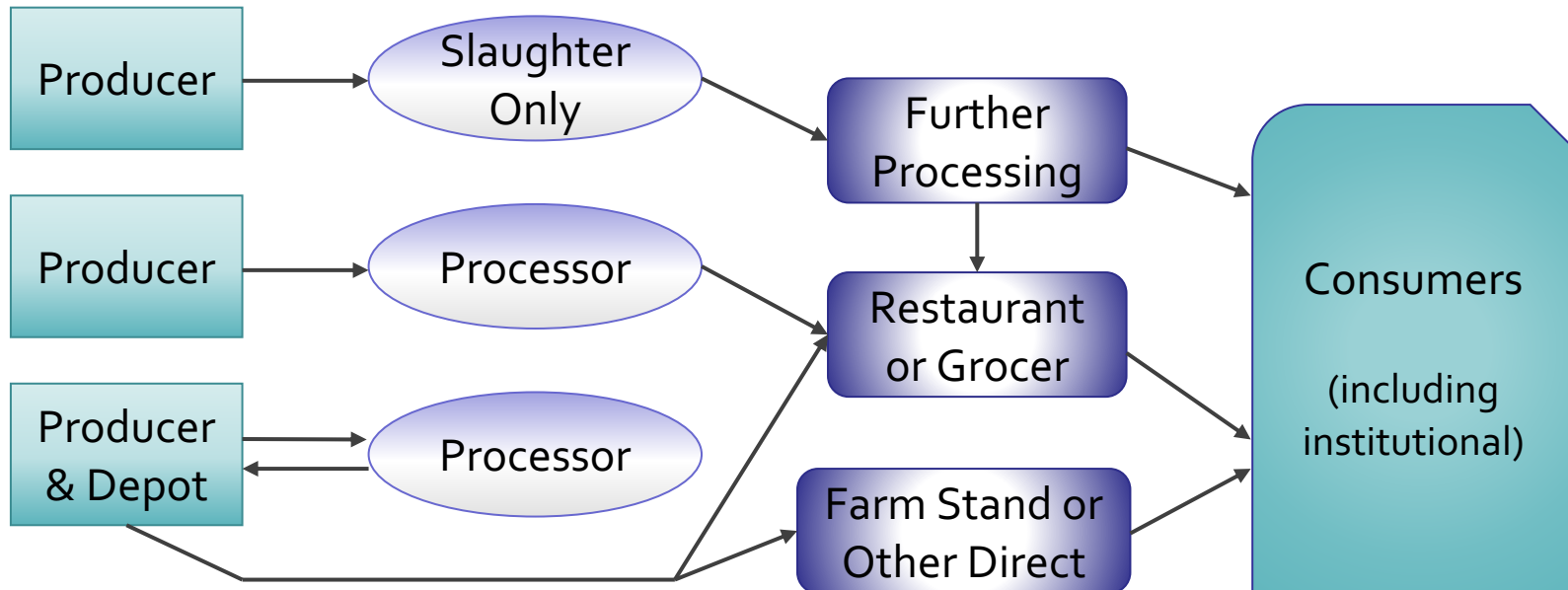
# Example Supply Chains for Local Meat

## Custom Exempt - Cattle Share(s) – Owners Only



---

## Inspected Scenarios (USDA or State) – Full Retail Options, Including Schools



Buying Local Meat in Montana:  
<https://store.msuextension.org>  
Keyword: buying local

# Contact Information

## **Tommy Bass**

Livestock Sustainability Specialist  
Montana State University Extension  
[tmbass@montana.edu](mailto:tmbass@montana.edu)

406.994.5733

## **Andrea Sarchet**

Produce Safety Coordinator  
Montana Department of Agriculture  
[andrea.sarchet@mt.gov](mailto:andrea.sarchet@mt.gov)

406.444.0131

Produce Safety website:

<https://agr.mt.gov/Produce-Safety-Program>

## **Jenna Fisher, RS**

Public Health Sanitarian  
Department of Public Health and Human  
Services

Food and Consumer Safety Section

[jenna.fisher@mt.gov](mailto:jenna.fisher@mt.gov)

406.444.0067

Food and Consumer Safety website:

<https://dphhs.mt.gov/publichealth/fcss/>



Bringing the Farm to School

Turn to **Page 17** of your workbook

## Selling to School Markets

Module 2 – Section A





# Learning Objectives

- **Identify the best market channels** for selling to schools, based on your operation's capacity and goals.
- **Understand how to read and respond to a solicitation.**
- **Understand how to meet the vendor requirements** of school markets.
- **Understand how to meet the product-quality standards** of school markets.
- **Understand how to approach and communicate with school buyers.**

# Applied Activity – Let's Play Jeopardy; Page 62

<b>Market Channels</b>	<b>School Buyers</b>	<b>Quality Standards</b>	<b>Vendor Requirements</b>
\$100	\$100	\$100	\$100
\$200	\$200	\$200	\$200
\$300	\$300	\$300	\$300
\$400	\$400	\$400	\$400



# Section A: Farm To School Market Channels

# Overview of Farm to School Market Channels

There are **3 primary supply chain models** for getting your food into school markets:

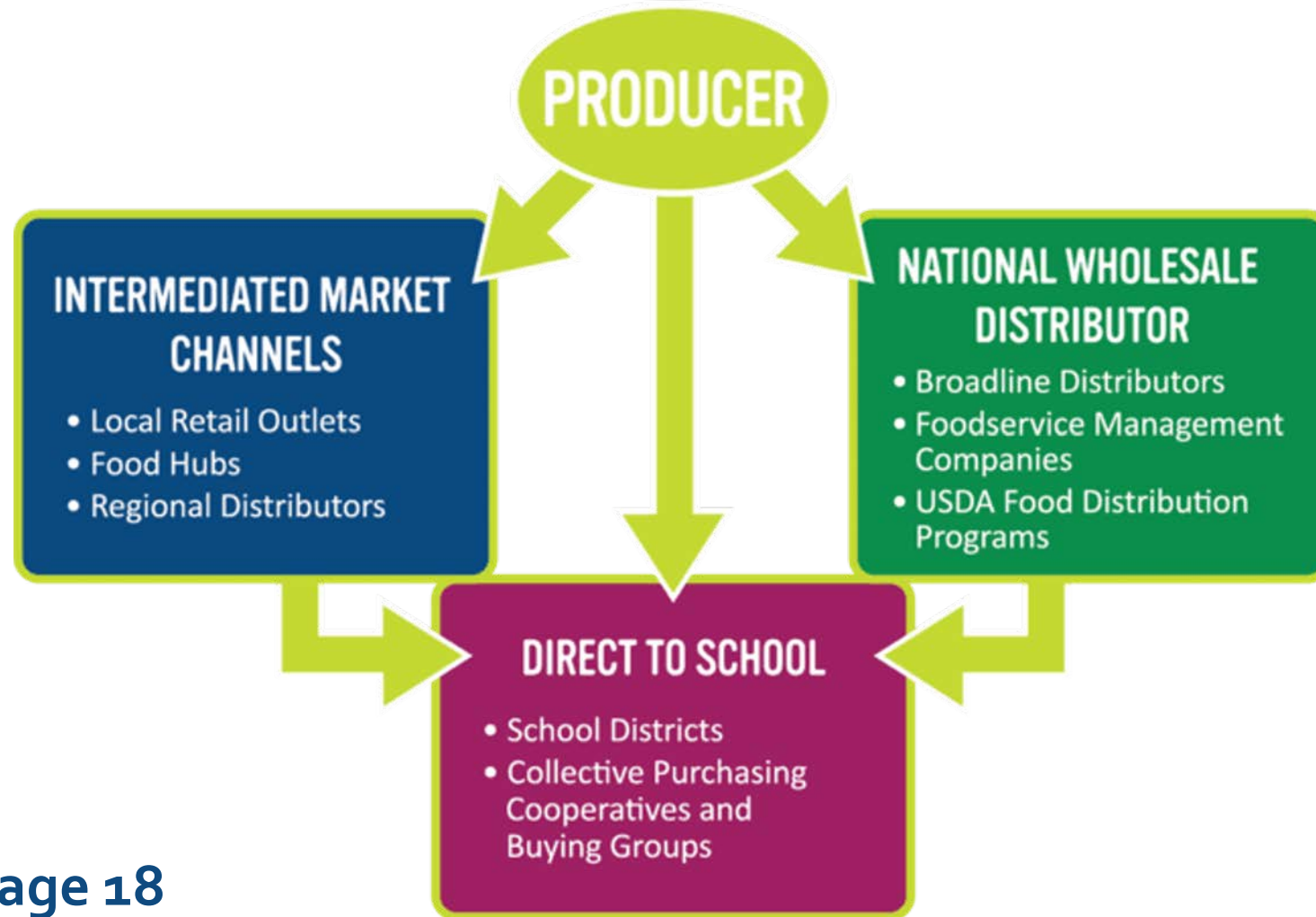
- Direct-to-school
- Intermediated
- Broadline distributors

According to the USDA Farm to School Census,

- 63% of school districts that participate in farm to school use intermediaries, such as distributors
- 40% of schools report they get local food through a farmer directly

# How Does Your Product Get to the School?

## MARKET CHANNELS FOR SELLING TO SCHOOLS



# Intermediated Market Channels

- Local Retail Outlets
- Regional Aggregators and food hubs
- Value Added Processors
- Independent Local and Regional Distributors

# Selling to Schools Through Local Retail Outlets



Photo: Unsplash

# Selling to Schools Through Food Hubs





# Selling to Schools Through Regional Distributors



# Considerations for Selling to Schools Through Regional Distributors

- These channels can be a good match for producers familiar with wholesale practices
- Regional distributors do source from small and diversified farms
- Many distributors rely on established suppliers
- Important considerations include:
  - Understanding of forward contracting
  - Having a food safety plan and food safety certification
  - Product quality and post-harvest handling
  - Ability for providing computerized invoice and recordkeeping program
  - Contingency plans

# National Wholesale Distribution Channels

- Broadline distributors
- Foodservice management companies
- USDA food distribution programs (eg, USDA Foods and DoD Fresh)

# Direct-to-School Supply Chains

Direct-to-school supply chains are what many people think of first when they hear farm to school...



Photo: Unsplash



Photo: USDA

a relationship directly between a local producer and the school.

# Direct-to-School Buyers

School buyers have many names, such as:

- School Food Authorities
- School Nutrition Directors
- School Foodservice Managers
- Procurement Managers



Photo: USDA

# Direct-to-School Market Channels

## **Farmers Markets & Farm Stands:**

- Producers can sell directly to schools through farmers market channels they may already be utilizing.

## **Community Supported Agriculture:**

- Schools may become a CSA drop site or offer a farm raiser

## **School Contracts & Purchase Orders:**

- Producers can sell directly to school districts utilizing both formal and informal procurement methods.

# Collective Purchasing Models

Producers can potentially establish themselves as an approved supplier, so that they can access multiple school markets through a streamlined process, thereby:

- aggregating product demand
- increasing product volumes
- expanding school sales

# Direct-to-School: Potential Benefits

- High levels of customer satisfaction
- Allows you to retain and grow your brand & business
- Potential market for lower grade products
- Direct lines of communication
- Increased competitiveness in bidding processes
- Local decision-making processes



Photo: USDA



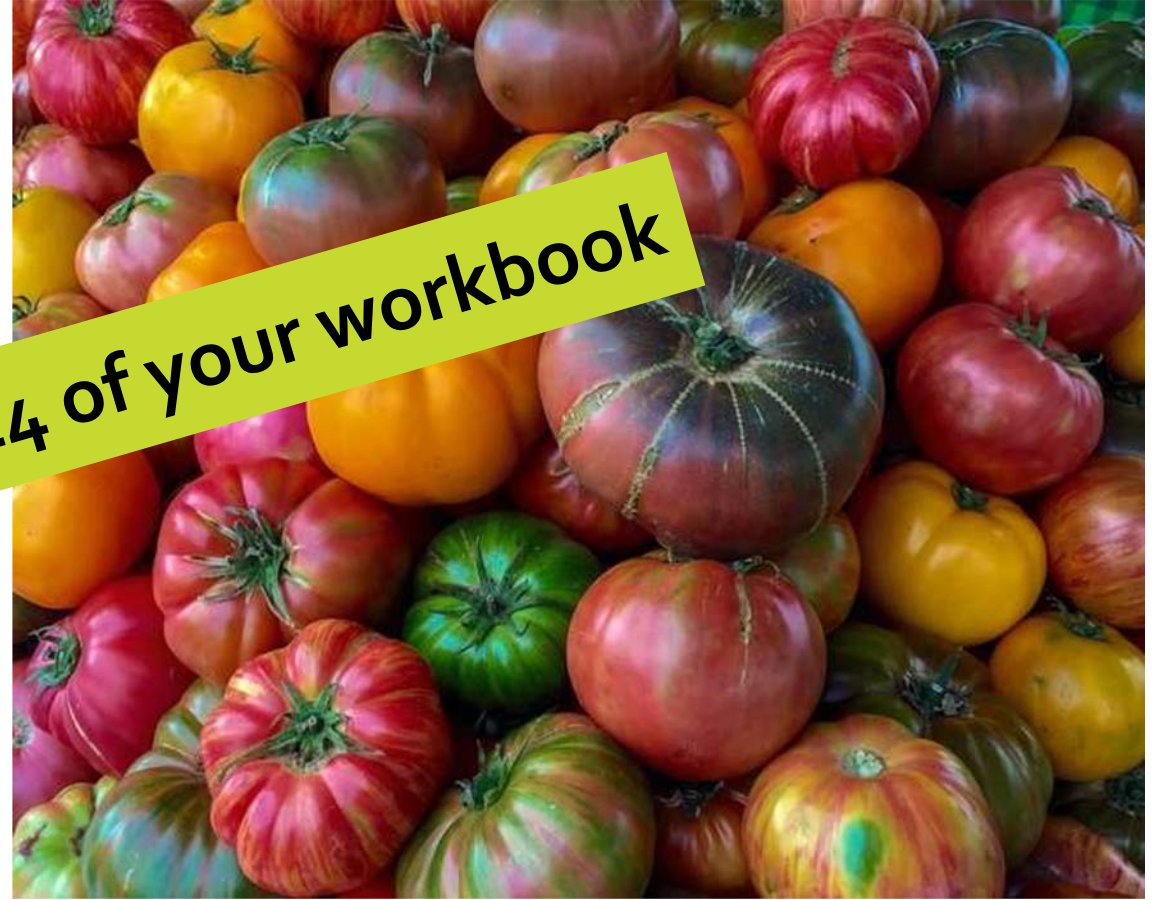
# Direct-to-School: Potential Drawbacks



Photo: USDA

- Increased time spent marketing products
- Determining a fair price can be complex
- Minimum food safety standards
- Required documentation and recordkeeping
- Payment processes
- Vendor establishment

# Choosing the Market Channel Mix That Works Best For You



**Turn to Page 24 of your workbook**

Photos: USDA



# AGRICULTURAL PRODUCERS' TOOLKIT

Bringing the Farm to School

Panel



# Randy Lindberg

Co-Founder/Owner  
Quality Foods Distributing



# Jeremy Plummer

Co-Owner

Lower Valley Processing



# Jay Stagg

Food Service Director  
Whitefish School District



# Next Session

## Session 3

- December 7, 2022 at 8:30am – 4:00pm
- Hardin Middle School, Hardin, MT (In-person)
- Check-in: 8:00am - 8:20am (Please arrive by 8:20am)
- Mix of classroom content, school kitchen tour, virtual farm tour, discussions
- Lunch and snacks provided
- Recommended hotel: Homestead Inn + Suites, Hardin
- Mileage + Hotel Assistance Available

The *Bringing the Farm to School: Agricultural Producers' Toolkit* was developed in partnership by USDA Food and Nutrition Services, the National Center for Appropriate Technology, and the National Farm to School Network.



Aubree Roth, MT Team Nutrition, [aubree.roth@montana.edu](mailto:aubree.roth@montana.edu)  
Tammy Howard, NCAT, [tammyh@ncat.org](mailto:tammyh@ncat.org)  
Tommy Bass, MSU Extension, [tmbass@montana.edu](mailto:tmbass@montana.edu)  
Andrea Sarchet, MT Department of Agriculture, [Andrea.Sarchet@mt.gov](mailto:Andrea.Sarchet@mt.gov)  
Jenna Fisher, MT Dept of Public Health and Human Services, [Jenna.Fisher@mt.gov](mailto:Jenna.Fisher@mt.gov)  
Molly Kirkham, NCAT, [mollyk@ncat.org](mailto:mollyk@ncat.org)  
Jay Stagg, Whitefish School District  
Randy Lindberg, Quality Foods Distributing  
Jeremy Plummer, Lower Valley Processing