

Food Safety Food for Thought: HACCP in the School Kitchen

A recent article in FoodSafety Magazine caught our attention: [From Compliance to Capability: When HACCP Becomes a Living System | Food Safety Magazine](#) , by Dr. Shingai Nyarugwe and Dr. Heidi Gough. The article argues that many organizations treat Hazard Analysis and Critical Control Points (HACCP) as a compliance requirement rather than a living, day-to-day management system. HACCP plans often sit in binders (can you find your kitchen copy?), reviewed annually for audits, but they may not truly guide frontline decision-making or operational reality. This is especially true in school kitchens with limited staffing, tight timelines, high turnover and diverse kitchen setups. These challenges make a living HACCP system especially important.

A Food Safety Plan including HACCP was mandated in the Child Nutrition Reauthorization Act of 2005 with implementation expected by 2006. For twenty years, HACCP manuals have been a part of the school kitchen environment but how often are they actually looked at? This article was a deep dive into how to make HACCP a key piece of kitchen operation.

1. Moving HACCP Beyond Compliance Checklists

In many school districts, HACCP tends to be something required for reviews (DPI asks to see your freezer/cooler logs on review), audits (health inspectors will look at food temp logs), and state reporting (two health inspections required each year). The article encourages shifting it from “audit paperwork” to an everyday operational tool.

In practice, this could look like:

- Discussing food safety risks during daily, informal production meetings.
- Reviewing Critical Control Point (CCP) logs like cooler/freezer, hot holding and cold service logs as part of normal kitchen huddles, not just during inspections.
- Updating SOPs when staff notice practical challenges—not only during annual review.

2. Strong Leadership Presence Matters

For schools, “leadership” includes Directors, Managers, Kitchen leads and Principals (indirectly, through expectations and support).

Practical application:

- Walk through kitchens regularly, asking staff what steps are hardest to maintain.
- Reinforce that food safety concerns are welcomed and valued.
- Use on-site visits to observe how controls actually function during busy mealtimes.

This builds trust and encourages staff to report issues like broken equipment, outdated thermometers, or processes that don't work during peak service.

3. Empower the Frontline Staff

School nutrition employees carry out CCP monitoring, reheating, cooling, line service, and sanitation every day. The article stresses involving these operators in shaping and updating the HACCP system.

For school food service this could mean:

- Asking staff for input during the annual update of kitchen Standard Operating Procedures (SOPs) (ask things like “Does this step work with our morning rush?”).
- Training staff on the “why” behind controls, not just the steps.
- Ensuring monitoring tasks are realistic given staffing and time constraints (receiving is an especially tough task when deliveries show up during service).

When frontline teams feel ownership, compliance improves naturally—not because they “have to,” but because they understand the risk.

4. Address Workload, Stress, and Working Environment

Schools have tight schedules, common staffing shortages, many new or inexperienced workers and pressure to serve large volumes quickly.

The article emphasizes that high workload and unclear expectations lead to shortcuts. For schools, this may show up as incomplete temperature logs, rushed cleaning, and not reporting equipment issues quickly.

A living HACCP system checks whether workload is realistic—and redesigns tasks when needed.

5. Build Stability and Team Maturity

Turnover is common in school kitchens. When staff rotate frequently, HACCP becomes vulnerable to drift.

Schools can strengthen maturity by:

- Maintaining consistent cross-training
- Using simple onboarding tools (short videos, laminated guides, color-coded charts)
- Holding brief recurring food safety huddles
- Ensuring substitutes and floaters know critical controls

6. Maintain HACCP Proficiency

Many school nutrition staff receive HACCP training once (often years ago). The article stresses regularly assessing and refreshing capability.

Possible school applications:

- Quick refresher training modules
- “Micro-learning” topics during staff meetings
- Occasional proficiency checks (distinguishing “verification” from “monitoring,” etc.)

Please see the ‘**No Time to Train**’ that was handed out to each kitchen as a resource during the 2023 Back to School workshop for 15-minute training sessions on food safety as well as other topics. If you can’t find your copy, request another one at dpicnfd@nd.gov.

7. Make Food Safety Culture Visible at Schools

A mature food safety culture in schools means:

- Temperature monitoring is consistent even on the busiest days
- Staff raise concerns immediately (equipment failure, cooling issues, cross-contamination risks)
- Documentation is meaningful, not just “filled in to meet regulations”
- Principals and district leadership visibly support food safety priorities

In a mature culture, food safety becomes part of everyday conversation, not just something people think about during state reviews or inspections.

A Simple Takeaway for School Nutrition Leaders

The difference between **a compliant kitchen** and **a safe kitchen** is how HACCP is lived.

A living HACCP system in schools:

- Is visible in daily practices
- Empowers staff to speak up
- Encourages leadership to stay close to operations
- Reflects realistic staffing, workload, and equipment conditions
- Helps prevent silent drift that can lead to violations or unsafe meals

By treating HACCP as an active system rather than an audit requirement, school nutrition programs strengthen both food safety and staff confidence—ultimately protecting students more effectively.

We hope this encourages you to dust off that HACCP manual and review it with all staff, updating the necessary parts to reflect what you are *actually* doing this year in the kitchen to ensure students and staff are offered meals that are nutritious, delicious and SAFE.