



State of Arizona  
**Department of Education**

CN# 11-12  
USDA SP# 45-2011

MEMORANDUM

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**To:** School Nutrition Program Sponsors

**From:** Mary Szafranski, Deputy Associate Superintendent  
Arizona Department of Education, Health & Nutrition Services  
Cara Peczkowski, Director  
Arizona Department of Education, School Nutrition Programs

**Date:** September 2, 2011

**RE:** Food Safety Inspections in Service-Only Sites Participating in the School Meals Programs

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*Original Signed*

The purpose of this memorandum is to provide School Food Authorities (SFAs) with more specific guidance regarding the applicability of the food safety inspection requirements in schools that do not prepare food, such as those that only serve pre-packaged meals or meals delivered from a central preparation location (referred to in this memorandum as service-only sites).

As required by section 9(g) of the Richard B. Russell National School Lunch Act and Federal regulations at 7 CFR 210.13 and 7 CFR 220.7, **all** schools participating in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) must obtain **two** food safety inspections each school year. This inspection requirement applies to all food preparation-service sites and service-only sites. The Arizona Department of Education (ADE) must report the number of food safety inspections conducted at all sites in the annual report submitted to the United States Department of Agriculture (USDA). The scope of the food safety inspection may vary according to the type of food service operation and is determined by the state or local governmental agency responsible for inspections.

The ADE is aware that the inspection agencies generally do not view schools as high-risk food service operations, and sometimes do not recognize service-only sites as food service establishments because they do not actually engage in meal preparation activities. However, this does not change the requirement for all institutions that meet the definition of "school" under the NSLP and SBP, to obtain two inspections. SFAs must do their best to obtain the two required

inspections and document all inspection requests made to the agency responsible for inspections in the event that the school does not obtain two food safety inspections each school year.

The ADE is confident that compliance with the food safety inspection requirement will enable schools to enhance the safety of all foods served through the NSLP and SBP. For more information regarding this regulation please refer to CN memos 28-05, 03-06 and 11-08 on the ADE's Health and Nutrition Services website.

If you have questions or concerns regarding this memo, please contact your School Nutrition Programs Specialist at (602) 542-8700.

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