DEPARTMENT OF EDUCATION
OFFICE OF THE SUPERINTENDENT

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STANDARD OPERATING PROCEDURES

SOP # 1700-020

I. **SUBJECT:** Grab-and-Go School Lunch Service (Time as a Public Health Control – 3-Hour Rule)

II. **INQUIRIES:** Food and Nutrition Services Management Division (FNSMD)

III. **PURPOSE:** To establish standardized procedures for the safe preparation, handling, distribution, accountability, and educational integration of Grab-and-Go school meals utilizing Time as a Public Health Control (TPHC), ensuring compliance with federal, state, and local requirements.

IV. **AUTHORITY:**

- United States Department of Agriculture, Food Safety Guidance
- National School Lunch Program/School Breakfast Program (7 CFR, Parts 210 & 220)
- Child and Adult Care Food Program (7 CFR Part 226)
- Applicable Regulations and Requirements of the Department of Public Health & Social Services and the Guam Food Code

V. **SCOPE:** This SOP applies to all Guam Department of Education (GDOE) school sites participating in Grab-and-Go meal services, and all Food & Nutrition Services Management Division (FNSMD) personnel.

VI. **POLICY**:

Grab-and-Go meals may be held without temperature control for a maximum of three (3) hours under TPHC, provided all food safety, labeling, and accountability requirements are strictly followed. Meals must be distributed only to eligible students and must be fully documented at the point of service.

Grab-and-Go meal service must include a documented learning component. This requirement ensures that meal service supports the educational mission of GDOE and maintains program integrity.

VIII. **DEFINITIONS**

- ***Grab-and-Go Meals***: Pre-packaged reimbursable meals distributed for off- site consumption.
- ***Time as a Public Health Control (TPHC)***: A food safety method allowing food to be held without temperature control for a limited time (maximum 3 hours).
- ***Home School***: The school in which the student is officially enrolled.

IX. RESPONSIBILITIES

- ***Food Service Administrator***: Provides system-wide oversight and ensures compliance.
- ***Program Coordinators (State & Local)***: Conduct monitoring, technical assistance, and compliance reviews.
- ***Cafeteria Manager***: Ensures site-level implementation, documentation, and internal controls.
- ***Food Service Staff***: Responsible for meal preparation, labeling, distribution, and recordkeeping.
- ***School Administrator/Principal***: Supports enforcement of procedures and verifies required documentation.

X. PROCEDURES

A. Meal Preparation

1. Meals must meet USDA meal pattern requirements.
2. All food must be prepared in accordance with approved food safety and sanitation standards.
3. Meals shall be properly packaged, labeled, and secured to prevent contamination.

B. Time as a Public Health Control (TPHC) – 3-Hour Rule

1. The 3-hour holding period begins immediately when meals are removed from temperature control.
2. Each meal or batch must be clearly labeled with:
    - Time removed from temperature control
    - Discard time (not to exceed 3 hours)
3. Meals not served within the 3-hour window must be discarded and may not be reconditioned or reused.

C. Holding and Distribution

1. Meals must be:
    - Maintained in a clean, protected environment
    - Covered, wrapped, or sealed to prevent contamination
2. Distribution must follow First-In, First-Out (FIFO) principles.
3. Staff must actively monitor time controls throughout the service period.

D. Participation & Meal Access Control

1. Students must receive meals at their home school (school of enrollment).

2. Parents/guardians must report to the student's home school to pick up meals.
3. Families with students enrolled at multiple schools must pick up meals at each respective school site.
4. Participating school sites must be officially approved and publicly announced by GDOE.
5. Meal service at unauthorized sites is prohibited.

E. Meal Accountability & Roster Verification

1. Each school must maintain an official daily meal distribution roster.
2. At the point of service:
    - The parent/guardian or student must sign the roster at the time of meal pick-up
    - Staff must verify eligibility prior to issuing meals
3. Meal counts must accurately match the number of signatures on the roster.
4. Completed rosters must be:
    - Submitted daily with meal count documentation
    - Maintained for audit, review, and compliance verification

F. Staffing Requirements

1. Each site must assign sufficient personnel to:
    - Distribute meals
    - Verify roster accuracy
    - Maintain meal count integrity
2. Staff must ensure:
    - No duplicate meals are issued
    - Meals are issued only to eligible students
    - Proper internal controls are followed at all times

G. Monitoring

1. Cafeteria Managers must:
    - Maintain and monitor the HACCP Daily Log for time control (TPHC)
    - Maintain Daily Production Records for review
    - Verify proper labeling and discard times
    - Ensure roster accuracy and alignment with meal counts
    - Ensure the Principal reviews and signs the discard log on the HACCP Daily Log
    - Submit the HACCP Daily Log to FNSMD with daily meal count reports
2. Program Coordinators will conduct periodic monitoring to ensure compliance with:
    - Food safety requirements
    - Meal accountability and internal control standards

H. Learning Component

1. Acceptable learning components may include, but are not limited to:
    - Digital or online education resources communicated to families

- Hand outs
- Printed class assignments

2. The learning component must:
   - Be age-appropriate and relevant
   - Be consistently implemented across participating sites
3. Program Coordinators will monitor implementation during site reviews and administrative oversight activities.

I. Corrective Actions

If non-compliance is identified:

- Immediately discard affected meals (for any food safety violation)
- Correct and reconcile roster discrepancies
- Retrain staff on proper procedures
- Document all findings and corrective actions taken
- Report significant issues to FNSMD Administration

XI. RECORDKEEPING:

The following documentation must be maintained daily:

- HACCP Daily Log (including time control and discard verification)
- Daily Production Records
- Meal Distribution Rosters (with required signatures)
- Daily Meal Count Verification Reports (DMCVR)
- Documentation of Nutrition Education / Learning Component
- Corrective Action Reports (if applicable)

All records must be retained in accordance with federal and local record retention requirements.

XII. EFFECTIVE DATE: This SOP is effective upon the date of approval and signature.

XIII. CHANGE(s): This policy shall be reviewed annually or as required. Changes to this policy shall be effectuated by the Superintendent of Education

XIV. COMPLIANCE

Failure to adhere to this SOP may result in:

- Disallowed meals
- Fiscal action during an Administrative Review
- Required Corrective Action Plans
- Additional oversight by regulatory agencies

XV. REFERENCES:

- 7 CFR Parts 210, 220 (National School Lunch Program, School Breakfast Program)
- 7 CFR Part 226 (Child and Adult Care Food Program)

- USDA Food Safety Guidance for School Meals
- Guam Department of Public Health and Social Services (DPHSS) Food Code
- GDOE Board Policy 705 – Local School Wellness Policy

Approved by:

(✓) APPROVED **( ) DISAPPROVED**

4-20-2026

Anthony Sean Monforte, Administrator — Date:
Food & Nutrition Services Management Division

(✓) APPROVED **( ) DISAPPROVED**

4/20/26

Jacqueline A. Quitugua, Deputy Superintendent — Date:
Educational Support and Community Learning

(✓) APPROVED **( ) DISAPPROVED**

4-20-26

Judith T. Won Pat, Ed. D. — Date:
Acting Superintendent of Education