

**USDA Child Nutrition Programs  
Administrative Review Summary Report**

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**School Food Authority: Redeemer Lutheran School**

**Agency Code: 207264**

**School(s) Reviewed: Redeemer Lutheran School**

**Review Date(s): 11/16/17**

**Date of Exit Conference: 11/16/17**

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Redeemer Lutheran for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

**REVIEW AREAS**

**1. MEAL ACCESS AND REIMBURSEMENT**

**Certification and Benefit Issuance**

**Commendations/Comments/Technical Assistance/Compliance Reminders**

- Of those students eligible for free/reduced price meals in October, all but one was approved correctly, and direct certification had been run in the appropriate timeframes.

### Free and Reduced Price Meal Applications

- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).

### Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of non-duplicated names on the application for the application to be considered complete.
- Free school meal benefits must be extended to all children who are members of a household in which one person in that household is receiving FoodShare, W-2 Cash Benefits, or FDPIR benefits.

### Findings and Corrective Action Needed: Certification and Benefit Issuance

- Finding #1:** The applications had income annualized.  
**Corrective Action Needed:** Please provide a statement of understanding that going forward, all applications will not be converted to yearly unless more than one frequency of income is reported.

### **Verification**

### Commendations/Comments/Technical Assistance/Compliance Reminders

- Only those applications chosen for verification are required to have the person designated as the Confirming Official review the application(s) to ensure the initial determination is correct prior to contacting the family.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

### Findings and Corrective Action Needed: Verification

- Finding #1:** When SFA receives verification documentation, the documentation which the household provides must only be for the income frequency recorded on the original application. The documentation for the household that was pulled for verification was reviewed incorrectly and benefits were incorrectly changed from free to reduced.  
**Corrective Action Needed:** Please notify the household within 3 calendar days that their benefit is reverting back to free. Also, please provide a statement of understanding that going forward, all benefit documentation will be calculated at face value for the frequency provided.

### **Meal Counting and Claiming**

### Commendations/Comments/Technical Assistance/Compliance Reminders

- DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals every school day (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

## **Findings and Corrective Action Needed: Meal Counting and Claiming**

- ❑ **Finding #1:** SFA contract states meal accountability system is a roster at end of the line but SA observed students being checked off at the beginning of the line.

**Corrective Action Needed:** Please update the contract to reflect this type of point of service.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations/Comments/Technical Assistance/Compliance Reminders**

Thank you to the school nutrition staff, including volunteers, for providing healthy meals to students at Redeemer Lutheran School. Staff were welcoming and available for questions and requests for additional information and documentation. The Food Service demonstrated a good understanding of program requirements. The kitchen was bright, tidy, and efficiently organized. All students were offered colorful, well-balanced meals of good quality.

### **Technical Assistance and Program Requirement Reminders**

#### **Production Records**

- Production records are intended to be useful tools to record information prior to production, during production, and following production. However, Waste, Leftovers, and Amt Used/Served must be completed until the end of meal service. The Amount Prepared may not match the Amt Used/Served during the meal period. Changes may occur between the time student orders are placed and meal service (e.g. student goes home, student mistakenly orders lunch).
- Production records must be accurate. At Redeemer Lutheran School, the menu and the production records indicated 138 count apples were served. According to the USDA Food Buying Guide, one 138 count apple credits as one cup of fruit. Apples observed in the refrigerator at Sabish Middle School, which transports food to Redeemer Lutheran School, were 163 count apples, crediting as 3/4 cup of fruit. The entrée salads were offered during the review period. The roll accompanying the salad was listed on the production records as a 2.5 ounce weight, crediting as 2 ounce equivalents of grain. Rolls observed in the freezer at Sabish Middle School were 1.25 ounces by weight, crediting as 1 ounce equivalent of grain based on crediting documentation from the Fond du Lac School District Food Service Director. These two examples illustrate the importance of checking production records against products received and served.
- All items offered and served as part of reimbursable meals, including condiments, must be recorded on production records.

#### **Crediting Documentation**

- Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted. This is especially important when substitutions impact crediting and subsequently daily and weekly meal pattern requirements.
- This requirement is outlined in the joint agreement template, #12: "The seller shall comply with all other requirements of their DPI agreement/application as it produces and makes available meals to the Purchaser, including providing the Purchaser with daily production/transport sheets indicating how menu items contribute to meal pattern requirements and supporting documentation for contribution." This was discussed onsite, and the Food Service Director will begin requesting and maintaining documentation onsite.

### **Crediting Orange Wedges**

- According to the USDA [Food Buying Guide for School Meal Programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (<http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>), one standard 138 count orange credits as 1/2 cup fruit. Therefore, if an orange is cut into quarters, three wedges only equal 3/8 cup and two wedges only equal 1/4 cup. A full orange needs to be selected in order to obtain a full 1/2 cup portion.

### **Substitutions**

- Any changes to the planned menu must be documented on the production record. A substitution should be a food that credits comparably to the original planned item, have a similar nutrition profile, and belong to the same vegetable subgroup (when applicable) to the extent practicable. However, it is always better to substitute something creditable, rather than have a missing component. Per the Food Service Manager at Sabish Middle School and the Food Service Director at Redeemer Lutheran School, communication is well-established to prevent component shortages or missing components.

### **Training Recommendation**

- The School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. Information, including dates and locations, will be posted on the SNT Training webpage (<http://dpi.wi.gov/school-nutrition/training>) as they are scheduled.

### **Signage**

- Post signage visible to the students that indicates the offered components and tells students what they must select in order for their meals to be reimbursable. Lunch signage lists the five required components and informs students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination of fruit and vegetable. The large whiteboard posted near the service window is updated daily, appropriately listing menu items by component. Please add a statement to your current signage that states the student must select at least ½ cup fruit, vegetable, or combination. You may create a magnet, similar to magnets currently on the whiteboard, or write the statement on the whiteboard.
- If you are interested in ordering signage from SNT, please visit the [Team Nutrition](http://dpi.wi.gov/team-nutrition) webpage ([dpi.wi.gov/team-nutrition](http://dpi.wi.gov/team-nutrition)) and complete the Resource Order Form.

### **Findings and Corrective Action Needed: Meal Pattern**

- Finding #1:** The required 1/2 cup fruit, vegetable, or fruit vegetable combination statement is missing from signage.

**Corrective Action Needed:** Add a statement to your current signage stating a student must select at least ½ cup fruit, vegetable, or fruit/vegetable combination as part of his or her reimbursable meal. **Submit a photo of updated signage.**

## **3. RESOURCE MANAGEMENT**

### **Nonprofit School Food Service Account**

### **Commendations/Comments/Technical Assistance/Compliance Reminders**

#### Annual Financial Report (AFR):

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.

- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
  - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted for shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

#### Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf): <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter
  - Sample robo-call script

#### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

- ❑ **Finding #1:** School does not have an Unpaid Meal Charge policy which was required to be in place and distributed to all families by July 1, 2017.  
**Corrective Action Needed:** Submit a timeline for the development and completion and of an unpaid meal charge policy.

#### **Revenue from Nonprogram Foods**

#### **Commendations/Comments/Technical Assistance/Compliance Reminders**

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals, if you do sell adult meals these expenses and revenues must be separated from Program foods.

#### **4. GENERAL PROGRAM COMPLIANCE**

##### **Civil Rights**

#### **Commendations/Comments/Technical Assistance/Compliance Reminders**

##### Public Release

- The public release must be provided to the local news media (if no payment is required), the unemployment office, grass roots organizations, and any major employers contemplating large layoffs in the attendance area of the school [7 CFR 245.5(a)(2)].

##### Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

#### Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits.

#### **Findings and Corrective Action Needed:**

- **Finding 1:** Public Release was not posted at grassroots organizations  
**Corrective Action Required:** Please post public release in, at least one additional location.
- **Finding #2:** Student eligibility is denoted in red or blue on the check-off sheet which constitutes overt identification.  
**Corrective Action Required:** Please remove eligibility status colors from point of service documentation.

#### **Local Wellness Policy**

#### **Commendations/Comments/Technical Assistance/Compliance Reminders**

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.
- At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

#### Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](#) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:
  - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
  - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)

- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).
- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies ([http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)). Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).
- **SFA is required to have a committee of diverse stakeholders and/or a roster of those involved (1003)**  
**Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. SFA wellness committees should include a diverse team of committed school and community stakeholders. Redeemer Lutheran does not indicate a diverse team of committee members. The SFA must retain documentation on stakeholders who participates in the Local Wellness Policy development, review and update.
- **SFA is required to inform potential stakeholders of their ability to participate in the Local Wellness Policy (1004)**  
**Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](#) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>).
- **SFA is required to complete an assessment of the Local Wellness Policy (1005)**

**Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your schools report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

- **SFA required to inform the public of the results of the most recent assessment (1006)**  
**Technical Assistance for 1006, if do have a policy:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include a plan to improve upon the results of the assessment.

#### **Findings and Corrective Action Needed:**

- **Finding #1: Your SFAs Local Wellness Policy does not contain language for all the minimum required elements stipulated above (1000)**

**Corrective Action Required:** Language must be updated to correct content of LWP: 1) The wording, "To the maximum extent practicable," in the school meals section of the policy, must be removed. If Redeemer Lutheran School is participating in the USDA Child Nutrition Programs (National School Lunch), 100% compliance is required. 2) Also, the whole grain rich requirement for National School Lunch has been updated since this policy was written. The current regulation requires that 100% of all grains served are whole-grain rich, not half, as the policy indicates. Please provide a timeline for updating your policy to become compliant with the final rule. The [Local Wellness Policy Checklist](#) can assist with sample language.

#### **Professional Standards: New Food Service Director Hiring Requirements**

#### **Commendations/Comments/Technical Assistance/Compliance Reminders**

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.

- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](#) are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

Directors: 12 hours

Managers: 10 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

Findings and Corrective Action: Professional Standards

- **Finding #1:** A food service director was not designated for the SFA.  
**Corrective Action Needed:** Please designate a food service director and provide a timeline for how the required 12 hours of continuing education will be met.
- **Finding #2:** Staff have not completed the required training hours for the current school year and was unable to provide a training plan for the current school year.  
**Corrective Action Needed:** Provide a training plan for meeting the required training hours.
- **Finding #3:** Training is not being monitored on a tracking tool.  
**Corrective Action Needed:** Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices ([www.fns.usda.gov/ofs/food-safety-flashes](http://www.fns.usda.gov/ofs/food-safety-flashes)). While you're at it, visit the [Office of Food Safety](#) website ([www.fns.usda.gov/ofs/food-safety](http://www.fns.usda.gov/ofs/food-safety)) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

### Food Safety Plans

- The food safety plan has standard operating procedures (SOPs) that describe procedures for glove usage, handwashing, and bare-hand contact with food. On the day of the review, some employees were observed touching non-food items while wearing disposable gloves then proceeding to touch food items without changing gloves. One employee was observed handling ready-to-eat food with bare hands. One employee was observed changing gloves when switching tasks without washing hands in between. These observed practices are not allowed under the SOPs included in the food safety plan. The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- The food safety plan does not include an SOP for receiving deliveries of food. Because the SFA receives food items from another school, an SOP should be in place outlining how these foods will be safely received upon delivery and stored until service. The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site. See findings and corrective action below.

### Food Employee Reporting Agreements

- All food service handlers must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>). See corrective action below.
- All food handlers must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

### Time as Public Health Control

- The process of serving hot and cold time/temperature control for safety (TCS) foods outside of mechanical temperature control (steam table, plug-in cooler, etc) is considered using "time as a public health control." Because this practice is utilized, all TCS foods stored and served outside of mechanical temperature control by serving them in pans placed directly on the counter must be discarded at the end of service. During the spring recordkeeping inspection by the local regulatory authority, please confirm with the sanitarian that the current practices of using time as a public health control is approved. An SOP for this practice should be included in the food safety plan. Please see finding and corrective action below.
- **When using "Time as a Public Health Control:"**
  - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of this holding period for cold time/temperature control for safety (TCS) food.
  - Cold TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
  - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.

- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

#### Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

#### Findings and Corrective Action: Food Safety

- **Finding #1:** Standard operating procedures (SOPs) for receiving deliveries and using time as a public health control are not included in the food safety plan.  
**Corrective Action Needed:** Add and adapt site-specific SOPs for receiving deliveries and using time as a public health control. DPI has a template available for [receiving deliveries](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp_may14_1.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp\_may14\_1.doc). The Institute of Child Nutrition has a template available for [time as a public health control](http://nfsmi.org/ResourceOverview.aspx?ID=75) (http://nfsmi.org/ResourceOverview.aspx?ID=75). Submit updated SOP as attachments to assigned DPI Nutrition Program Consultant via email.
- **Finding #2:** Missing Food Employee Reporting Agreements for volunteer food handlers.  
**Corrective Action Needed:** Complete all missing agreements. Submit copies of completed agreements as an attachment to assigned DPI Nutrition Program Consultant via email.

#### **Buy American**

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
  - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
  - If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and

contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.

- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. [Sample written procurement contract management procedures](#) are available online with Buy American monitoring procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### **Findings and Corrective Action Needed: Buy American**

- ❑ **Finding #1:** The following products were identified in the SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Cucumbers from Mexico
- Pineapple from Thailand
- Trio gravy from Canada

**Corrective Action:** The identified noncompliant food item(s) qualify to be on the non-compliant product list, but the SFA does not have a noncompliant list/process in place for tracking.

Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A [template form](#) is located on the procurement webpage at <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>.

- **Label does not identify country of origin:**  
In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the TA notes above for sample

certification language. This will be treated as TA for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

### **Summer Food Service Program (SFSP) Outreach**

#### **Commendations/Comments/Technical Assistance/Compliance Reminders**

##### **Summer Meals**

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Redeemer Lutheran USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. Fond du Lac public school offers summer meals.
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

#### **Findings and Corrective Action: SBP and SFSP Outreach**

- Finding #1:** No summer food service outreach was provided to students.

**Corrective Action Needed:** Please provide a statement that Redeemer Lutheran will notify students of the ability to receive free summer meals at Fond du Lac public school.

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Special Milk Program**

#### **Commendations/Comments/Technical Assistance/Compliance Reminders**

- All Special Milk Program claims were correctly counted and claimed.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate](http://dpi.wi.gov/statesupt/agenda-2017) webpage ([dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017)).