

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

SFA Name: Institute of Technology and Academics-401527

Administrative Review Conducted on: 3/9/2017

Sites Selected for Review: Institute of Technology and Academics

Date Corrective Action Plan was provided to SFA: 4/12/2017

Due Date for Corrective Action Plan: 5/12/2017

Commendations & Suggestions

Outstanding job meeting all of the requirements for breakfast. All daily and weekly meal component and food quantity requirements were met for the week of menu review, for breakfast.

Other areas of Technical Assistance (NOT requiring Corrective Action)

Menu Review- technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.

The SFA should revise their food safety plan to tailor it specifically to the school's needs.

At the end of meal service, the SFA should manually add the meals for each category instead of waiting until the end of the week or month to total meal counts.

Wellness policy needs to be specific to the SFA. TA given on-site regarding public involvement. SFA's are required to include language related to permitting the public to participate in LWP development, implementation, and review in the written policy. During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources. The SFA was provided with the USDA link for Wellness Policies. <http://www.fns.usda.gov/tn/local-school-wellness-policy>.

During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be made available to the public. The easiest method would be to post the wellness policy on the SFAs website. They can also send it out in a newsletter.

Recommend contacting the health department to remind them that a second inspection is needed for this school year.

Once the assessment of the wellness policy has been completed, it must be made available to the public.

SFA is performing Summer Food Service Program outreach. However, outreach is not being performed in the areas where a majority of the students reside. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.

Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites.

Methods to locate sites that serve free meals to children during the summer include the following:

- Call 211
- Call 1.866.3Hungry or 1.877.8Hambre
- Visit the website: www.fns.usda.gov/summerfoodrocks (note, this replaces the whyhunger.org website)
- Use the site locator for smartphones - Rangeapp.org

It is recommended that the SFA complete meal pattern and crediting training in an effort to better understand meal pattern requirements.

The following pages address the findings that were identified during your Administrative Review.

For each finding you will be presented with the following:

The finding, and details specific to the SFA regarding the finding	A summary of the regulation / requirement
The Code of Federal Regulations citation number or alternate resource citation	Suggested guidance for the SFA in order to achieve compliance
	SFA area for reply to state how, when and by whom corrections will be made

Please provide a detailed response to each finding in the spaces provided.

Finding #1
For the week of menu review, the K-8 lunch menu did not meet the minimum daily requirement of 1 ounce equivalent grain. A grain was provided, however the rice served on Wednesday is not whole grain rich and therefore not creditable towards the grain requirements.
Technical Assistance Provided
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/
Regulation / Citation and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: 1 oz. equivalent daily grain.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #2

For the week of menu review, the K-8 lunch menu did not meet the 100% Whole Grain Rich requirement for grains. Not all grains provided were Whole Grain Rich.

Technical Assistance Provided

During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. <http://healthymeals.nal.usda.gov/menu-planning/whole-grains>

Regulation / Citation and Summary

210.10(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with

enriched and whole grain meal or flour, in accordance with the most recent grains FNS guidance. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance with the Whole Grain Rich requirements. The plan should include; a statement that only Whole Grain Rich grain products will be used as part of the reimbursable meal, a statement that all labels/recipes/manufacturer statements will be kept on file to document the Whole Grain Rich compliance, and a statement that additional menu training will be provided to SFA staff. Provide the outline for the training and the dates that the training(s) will be completed. In the plan include the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. In addition to the plan please submit a revised menu from the week of review that clearly identifies the products that have been changed to bring the menu into compliance, submit any needed supporting documentation such as labels, recipes, and/or manufacturer statements.

SFA Response

Finding #3

The SFA did not provide training annually or as needed to cashiers and substitute cashiers.

Technical Assistance Provided

During the review, training for cashiers and substitute cashiers was discussed. The SFA does not provide training to cashiers and substitute cashiers. It is recommended that the SFA provide training annually or as needed to cashiers and substitute cashiers. The SFA acknowledged the technical assistance and will implement needed changes.

Regulation / Citation and Summary

210.18(h)(1) Free and reduced price process. In the course of the review of each school food

authority, the State agency shall: (vii) Determine that, for each reviewed school, the lunch count system does not overtly identify children eligible for free and reduced price lunches. SP 45-2012: SFAs must assure that a child's eligibility status is not disclosed at any point in the process of providing free or reduced price meals, including notification of the availability of free or reduced price benefits; certification and notification of eligibility; provision of meals in the cafeteria; and the point of service. Of particular concern is prevention of overt identification in the food service area, especially at the point of service. Any meal cards, tickets, tokens or other methods to obtain reimbursable meals cannot be coded or colored in a manner that would overtly identify free and reduced price eligible children. In addition, SFAs must take steps to assure that rosters, computer-screens or other equipment used at the point of service cannot be viewed by anyone not needing the information, especially students. Further, the information on the rosters or screens should be masked or coded to avoid other students discerning any student's eligibility status.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for counting and claiming, the SFA must provide written assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan. The plan must include; an indication that the POS is no longer allowing for overt identification, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at <http://www.schoolnutritiontoolbox.org/snt-v3/index.php>.

SFA Response

Finding #4

Offer vs. Serve was not implemented correctly. On the day of review, there were 5 meals that were short 1/2 cup of vegetable. Only 1/4 cup of vegetable was selected.

Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

Regulation / Citation and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: 1 oz. equivalent daily grain.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the day of review with the corrections that were made to the menu to bring it into compliance moving forward.

SFA Response

Finding #5

The cafeteria staff has not been trained on Offer versus Serve.

Technical Assistance Provided

If the SFA is going to implement Offer vs. Serve, they should annually train their staff and train new staff as needed. On going training should be provided depending on needs to staff in order to be in compliance with Offer vs. Serve procedures. It was determined during the review that the SFA is not offering training on Offer vs. Serve to the cafeteria staff. Offer vs. Serve training found in the School Nutrition Toolbox was discussed with the SFA and completing the training was recommended.

Regulation / Citation and Summary

Offer vs. Serve Guidance Manual (Page 4) Schools are expected to conduct training for cashiers and

serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Annual training is required to meet the professional standards requirements.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements of Offer vs. Serve, the SFA must submit a written statement that training for all kitchen staff will be provided.. In addition the SFA must also provide the name and title of the SFA representative that will ensure compliance with this finding moving forward, an outline of the training that was provided to staff to inform them of the requirements and the date the training was completed.

SFA Response

Finding #6

The SFA must use the current civil rights statement on all Program materials. The SFA is not using the civil rights statement on all Program materials.

Technical Assistance Provided

During the review the requirement for the most current civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the most current statement on all Program material. Per USDA requirements the new Non-discrimination statement must be on all program materials no later than September 30, 2016. The SFA was provided with the USDA link to the new non-discrimination statement. <http://www.fns.usda.gov/fns-nondiscrimination-statement>

Regulation / Citation and Summary

FNS Instruction 113-1 IX A 3 Nondiscrimination Statement. All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other sub recipients to inform the public about FNS programs must contain a nondiscrimination statement. It is not required that the nondiscrimination statement be included on every page of the program information Web site. At the minimum, the nondiscrimination statement, or a link to it, must be included on the homepage of the program information.

SFA Suggested Guidance for Compliance

To come into compliance with civil rights requirements, the SFA must submit an assurance to the State Agency that the current non-discrimination statement has been added to all program materials. In addition, the SFA must submit a sample of program materials, such as a menu or letter to households with the statement added to the State Agency.

SFA Response

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Finding #7
The SFA is attempting to resolve complaints alleging discrimination within the FNS School Meal Programs.
Technical Assistance Provided
During the review the process for receiving and processing complaints alleging discrimination was discussed with the SFA. The SFA should not attempt to resolve complaints in-house and should forward all complaints to the appropriate outside agency.
Regulation / Citation and Summary
FNS Instruction 113-1 Section XV All complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place. Anonymous complaints will be handled as any other complaints, to the extent feasible, based on available information.
SFA Suggested Guidance for Compliance
To come into compliance with civil rights requirements, the SFA must develop a procedure that will be put into place to handle any discrimination complaints and to forward them to an appropriate agency. The process must outline the steps that will be taken when a complaint is received, the name and contact information of the agency that the complaint will be forwarded to, and the name(s) and title(s) of the person(s) who will be responsible for forwarding complaints to the appropriate agency. Please submit the procedure to the State Agency.
SFA Response

Finding #8
The School Nutrition Program Director did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.
Technical Assistance Provided
During the on-site review, annual training hour requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition Program Director completes the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.
Regulation / Citation and Summary

210.30(b)(3) Continuing education/training standards for all school nutrition program directors. Each school year, the school food authority must ensure that all school nutrition program directors, (including acting directors, at the discretion of the State agency) complete annual continuing education/training. For the school year beginning July 1, 2015, program directors must complete eight hours of annual training. Beginning July 1, 2016, twelve hours of annual training are required. The annual training must include, but is not limited to, administrative practices (including training in application, certification, verification, meal counting, and meal claiming procedures), as applicable, and any other specific topics identified by FNS, as needed, to address Program integrity or other critical issues. Continuing education/training required under this paragraph is in addition to the food safety training required in the first year of employment under paragraph (b)(1)(v) of this section.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, indicating how the SFA will ensure that the appropriate training is completed and the dates of all future trainings.

SFA Response

Finding #9

SFA is not tracking training hours.

Technical Assistance Provided

During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

Regulation / Citation and Summary

210.30(g) School food authority oversight. Each school year, the school food authority director must document compliance with the requirements of this section for all staff with responsibility for school nutrition programs, including directors, managers, and staff. Documentation must be adequate to establish, to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, indicating how the SFA will ensure that training is now being tracked.
SFA Response

Finding #10
The SFA incorrectly reported financial information on the annual CNP Report.
Technical Assistance Provided
On the SFA’s Child Nutrition Program Report submitted to DPI for SY 15-16, the SFA did not report revenues. Additionally, the SFA did not record a general fund transfer to zero out the loss in the food service program. The financial report should be revised to show the revenues in the “All Other Fund 50 Revenue” line and a general fund transfer in the “Transfers from General Fund” line. The general fund transfer should be sufficient to zero out the loss in the food service program, as the food service account should not have a negative ending fund balance.
Regulation / Citation and Summary
7 CFR 210.14 (c) Financial assurances. The school food authority shall meet the requirements of the State agency for compliance with § 210.19(a) including any separation of records of nonprofit school food service from records of any other food service which may be operated by the school food authority as provided in paragraph (a) of this section.
SFA Suggested Guidance for Compliance
As the corrective action response, please explain the reporting errors made and the steps that were taken to amend the CNP Report. This should include a copy of the revised report submitted to DPI. Additionally, please explain the internal controls you have put in place to mitigate the risk of misreporting financial information on future financial reports.
SFA Response

Finding #11

An employee from the vendor, Yummi Foods is taking the point of service for lunch.
Technical Assistance Provided
During the review, technical assistance was provided to the SFA informing them that a person employed by the SFA must be the one taking the point of service for lunch. An employee from the vendor, Yummi Foods may not take the point of service.
Regulation / Citation and Summary
210.7(c)(1) Lunch count system. To ensure that the Claim for Reimbursement accurately reflects the number of lunches and meal supplements served to eligible children, the school food authority shall, at a minimum:(iii) Base Claims for Reimbursement on lunch counts, taken daily at the point of service, which correctly identify the number of free, reduced price and paid lunches served to eligible children; (iv) Correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement.
SFA Suggested Guidance for Compliance
To bring this area into compliance, please provide the person(s) by position(s) who are employed by the SFA who will be taking the point of service for lunch. Include the date this was implemented. Training is required for all those taking the point of service. Include the training date for civil rights as well as any other job specific duties.
SFA Response

Finding #12
An assessment of the Local School Wellness Policy has not been completed.
Technical Assistance Provided
During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.
Regulation / Citation and Summary
210.30 Local School Wellness Policy (e) Implementation assessments and updates. Each local

educational agency must: (1) Designate one or more local educational agency officials or school officials to ensure that each participating school complies with the local school wellness policy; (2) At least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public. The assessment must measure the implementation of the local school wellness policy, and include: (i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and (iii) A description of the progress made in attaining the goals of the local school wellness policy.
 (3) Make appropriate updates or modifications to the local school wellness policy, based on the triennial assessment.

SFA Suggested Guidance for Compliance

To come into compliance with this requirement the SFA must submit a statement that and assessment of the wellness policy will be completed by the wellness committee. In addition to the statement the SFA must submit the minutes from the meeting that was held to complete the assessment. If the assessment has been updated by the corrective action due date, submit a copy of the assessment report. If the due date is prior to the completion of the assessment, submit a detailed timeline for the completion of the assessment. Once it is completed copy of the assessment should be submitted to the state agency for review.

SFA Response

Finding #13

Part time employee does not have training requirements completed, planned, or tracked.

Technical Assistance Provided

During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the part-time staff complete the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

Regulation / Citation and Summary

210.30(d) Continuing education/training standards for all staff with responsibility for school nutrition programs. Part-time staff working an average of less than 20 hours per week must complete four hours of annual training beginning July 1, 2015. The annual training must include, but is not limited to, the following topics, as applicable to their position and responsibilities: (1) Free and reduced price eligibility; (2) Application, certification, and verification procedures; (3) The identification of reimbursable meals at the point of service; (4) Nutrition; (5) Health and safety standards; and (6) Any specific topics identified by FNS, as needed, to address Program integrity or other critical issues.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, indicating how the SFA will ensure that the appropriate training is completed and the dates of all future trainings.

SFA Response

Finding #14

The SFA has additional employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program who have not received applicable training. This includes the teachers taking the point of service.

Technical Assistance Provided

During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

Regulation / Citation and Summary

SP 39-2015: Question 29: Do the professional standards apply to a staff such as a secretary or an office assistant who processes free and reduced-price meal applications during the fall months only? No. Office staff members that process free and reduced-price meal applications or that provide other support for the school nutrition program for a short period of time during the school year are not required to meet the annual training standards. However, these individual should receive adequate training specific to the task they will perform.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan, indicating how the SFA will ensure that the appropriate training is completed.

SFA Response

Finding #15

Production records for the day of review are not complete.

Technical Assistance Provided
<p>During the review, production records were discussed with the SFA. The SFA must ensure that all sites are keeping accurate and complete production records for the meals they produce. The records must be completed throughout meal service and maintained everyday. At a minimum the production records should include the name of the item, the recipe or item number, the portion size, the number of planned portions, the component contribution amount and the number of actual servings. All kitchen staff should be trained on completing productions records so that everyone can complete the records.</p>
Regulation / Citation and Summary
<p>210.10(a)(3)Production and menu records. Schools or school food authorities, as applicable, must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day. Labels or manufacturer specifications for food products and ingredients used to prepare school meals must indicate zero grams of trans fat per serving (less than 0.5 grams). Schools or school food authorities must maintain records of the latest nutritional analysis of the school menus conducted by the State agency. Production and menu records must be maintained in accordance with FNS guidance</p>
SFA Suggested Guidance for Compliance
<p>To bring this area into compliance the SFA must submit a written assurance that includes; a statement that the SFA is aware of the production records requirement, a statement that production records will be maintained for all meals produced, a process for completing the productions records, and a statement that additional training will be provided to the SFA staff, include the training outline and the dates that the trainings will be held. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit a week of completed production records for review.</p>
SFA Response

Finding #16
<p>The SFA does not have any thermometers to take the temperatures of the deep freezers.</p>
Technical Assistance Provided
<p>During the on-site review, temperature logs were discussed with the SFA. The SFA must maintain temperature logs for all food storage areas, in accordance with the requirements of the local health department. The completed temperature logs must be kept on file for a minimum of 6 months. Working thermometers are required for taking food temperatures and taking and recording temperatures of all coolers and freezers. The food safety plan maintained on site should include keeping working thermometers, taking temperatures and recording the temperatures.</p>
Regulation / Citation and Summary

210.15(b)(5) The SFA must maintain records from the food safety program for a period of six months following a month's temperature records to demonstrate compliance with §210.13(c), and records from the most recent food safety inspection to demonstrate compliance with §210.13(b).

210.13(c) Food safety program. The school food authority must develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5). (1) A school food authority with a food safety program based on traditional hazard analysis and critical control point (HACCP) principles must: (i) Perform a hazard analysis; (ii) Decide on critical control points; (iii) Determine the critical limits; (iv) Establish procedures to monitor critical control points; (v) Establish corrective actions; (vi) Establish verification procedures; and (vii) Establish a recordkeeping system. (2) A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes: (i) Standard operating procedures to provide a food safety foundation; (ii) Menu items grouped according to process categories; (iii) Critical control points and critical limits; (iv) Monitoring procedures; (v) Corrective action procedures; (vi) Recordkeeping procedures; and (vii) Periodic program review and revision.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for food safety, the SFA must provide an assurance that the appropriate staff understand the requirements for food safety documentation. The assurance should include; a statement that the food safety plan will be implemented at each site, a statement that proper documentation practices will be established at each site, a statement that all temperature documents will be maintained for a minimum of 6 months, and that training will be completed for all appropriate SFA staff. Provide the agenda and sign-in sheets from the trainings. Please include the type of thermometers purchased and when they were installed into the deep freezers and/or any other coolers. Include the date of receipt and installation of the thermometers.

SFA Response