

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

School Food Authority: Minocqua Jt 1 School District

Agency Code: 43-3640

School(s) Reviewed: Creative Minds Elementary School

Review Date(s): 12/12-13/18

Date of Exit Conference: 12/13/18

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 Minocqua Jt 1 District 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

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** From the student sample reviewed for benefit's issuance, 6 students are receiving free benefits via Direct Certification Medicaid but should be reduced via Direct Certification Medicaid.
Corrective Action Needed: Please notify these household of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be assessed for these errors for the review period (November) and month of on-site review (December). USDA allows a \$600.00 per program disregard before fiscal reclaim is necessary.
- ❑ **Finding #2:** From the student sample reviewed for benefit's issuance, 1 student is receiving free benefits via electronic income application, but the student's name is not listed on the application so should not be receiving benefits.
Corrective Action Needed: Please notify this household of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be assessed for these errors for the review period (November) and month of on-site review (December). USDA allows a \$600.00 per program disregard before fiscal reclaim is necessary.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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:** The verified application was not given 10 calendar days between notification and benefits reduction.
Corrective Action Needed: Please provide a statement that going forward, if there is a benefit reduction due to verification, 10 calendar days will be given before the change is made.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- DPI has created [Field Trip meal resources](#) to help schools offer student meals every school day. Field trip meals must be charged to the student at the time of delivery of the reimbursable meal. If students do not come to cafeteria to pick up field trip meals, they must be checked off as the student receives the meal.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission, and each site listed on Schedule A of your on-line contract must have its own edit check to view before claim consolidation.
- For FSMC operated districts, monthly edit checks must be reviewed by the SFA's authorized representative each month and signature-approved before claim submission, even if the edit check is done by the POS software.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** The price being charged for a meal \$0.00, \$.40, \$2.95, showed up on the computer screen visible to staff and students, which results in overt identification, as students are able to tell another student's eligibility by what they are being charged for a meal.

Corrective Action Needed: Please program the register so the price does not show up via student eligibility and send a picture of the screen showing the change.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations: Thank you to the staff of Minocqua Joint #1 School District for their warm welcome, cooperation, and time during the Administrative Review. A special thanks to the Food Service Director for providing documentation prior to the on-site review. The school nutrition professionals are friendly and have great rapport with the students. We were impressed by the Food Service Lead's knowledge of meal pattern and crediting as well as the thorough planning for efficient production and clean up.

During meal service, it was observed that there is an additional staff member that helps control condiment usage by assisting students with the condiments that contain pumps. This is an excellent practice and helps control dietary specifications (calories, saturated fat, and sodium). All meals observed at breakfast and lunch were reimbursable and it is evident that students understand what constitutes a reimbursable meal.

We enjoyed our time at Minocqua Joint #1 School District. Thank you for your hard work and dedication to your School Nutrition Programs!

Technical Assistance:

Standardized Recipes

While Minocqua Joint #1 School District is part of a Food Service Management Company (FSMC) that uses the same recipes across multiple SFAs, it is important to ensure that the recipes that are followed actually contain the products that are used at the school. For example, two recipes provided for the week of review indicated that raw, 81/19 beef was used in the recipe. The Food Service Lead indicated that Minocqua Joint #1 does not use raw products. Instead, their site only uses beef crumbles. The Food Service Director was able to pull the same recipes with beef crumbles instead of raw 81/19 beef and provided them to the Food Service Lead.

The recipe for the chef salad offered during the week of review indicated that a two ounce honey wheat dinner roll is offered with the chef salad. In practice, Minocqua Joint #1 School District offers two-one ounce dinner roll with the chef salad. Since this recipe number is connected to the production record and dinner rolls were not recorded on the production record, the only way the State Agency could determine what was served was by observing two dinner rolls being served with the salad entrée option in practice during meal service observation.

It is important that standardized recipes and production records are clear and accurate regarding the products that are used in the recipe and offered as part of the reimbursable meal. Crediting varies between products, and often times, products are reformulated, changing the crediting.

Breakfast Signage – Food Items

Under Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered, but only three food items, one of which is ½ cup fruit, vegetable, or combination, must be selected in order

for the meal to be reimbursable. A food item is defined as 8 fluid ounces (fl oz) of milk; ½ cup of fruit (or ½ cup of vegetable can be substituted for fruit) and 1.00 ounce equivalent (oz eq) of grain (or 1.00 oz eq of meat/meat alternate can be substituted for grain, after 1.00 oz eq of grain has been offered for the day).

Breakfast signage is an excellent way to communicate to students what they are able to select as part of the reimbursable meal. Currently, students are able to select up to 2.00 oz eq grain (2 food items), 1 cup of fruit, and 8 fl oz of milk. All breakfast options, including the combined cereal and graham cracker option, credit as 2.00 oz eq grain. The menu planner indicated that these options count as 2 food items. However, signage indicates that these 2.00 oz eq grain options are being counted as 1 food item. In addition, the space that indicates how many food items a student can select from the category is not filled in for milk, fruit, and grain. Technical assistance was provided on how to fill in breakfast OVS signage and Food Service Lead and school nutrition professional who fills out signage daily indicated understanding.

Breakfast Participation

According to the school nutrition professionals at Minocqua Joint #1 School District, breakfast participation is around 40 students, which is very low compared to lunch participation that is around 400 students. DPI SNT encourages Minocqua Joint #1 School District to consider offering alternative service models such as a mid-morning nutrition break or Breakfast in the Classroom to aid in increasing student participation. Mid-morning models tend to work well in middle and high school environments where they have a passing time that would allow students to grab a meal between classes. This could be set up in the cafeteria or with mobile carts in the hallways.

DPI SNT's [Breakfast Resources](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage has information about the different breakfast service and financial models for reference (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>). If there are questions about breakfast models or if Minocqua Joint #1 School District would like ideas to increase participation, please contact the Breakfast Specialists listed on the bottom of the [School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program) webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>).

Minocqua Joint #1 School District may also want to consider sending the Wisconsin School Meals Rock [School Breakfast Program brochure](https://dpi.wi.gov/sites/default/files/imce/wisconsin-school-meals-rock/_files/brochure-get-school-breakfast.pdf) to families and caregivers to promote the benefits of breakfast (https://dpi.wi.gov/sites/default/files/imce/wisconsin-school-meals-rock/_files/brochure-get-school-breakfast.pdf).

Wisconsin School Breakfast Challenge

The Wisconsin Department of Public Instruction (DPI) School Nutrition Team is partnering with Hunger Task Force (HTF) and Share Our Strength's No Kid Hungry (NKH) to promote breakfast in Wisconsin schools through the Wisconsin School Breakfast Challenge. The challenge begins December 1, 2018 and ends February 28, 2019.

Schools across Wisconsin are invited to compete for prizes and recognition by increasing participation in their school breakfast program, or to start a new program if they do not already have one. As student participation grows, so do the chances for winning!

NKH will be providing the following amazing prizes:

- Grand Prize: \$1,000 for Highest Breakfast Participation Increase (2 Schools)
- \$750 Prizes for Most Improved Breakfast After the Bell (2 Schools)

- \$750 Prizes for Implementing School Breakfast Program (2 Schools)

Not only is there opportunity to win prizes, but *all participating schools* are eligible to apply for NKH's breakfast grants, totaling \$30,000. For these grants, there is no free and/or reduced price meal percentage requirement. **The deadline to apply is December 14, 2018.**

Ready to get started? [Register](#) your school and visit the [Hunger Task Force](#) website to gather all the details
(<https://docs.google.com/forms/d/e/1FAIpQLSfYzqakQt9WWPnbdD4yGY5iYBP06bxRCXgVgAUpscmtmwW15Q/viewform>; <https://www.hungertaskforce.org/about-hunger/priority-campaigns/school-breakfast-challenge/>).

Findings and Corrective Action Needed for Meal Pattern and Nutritional Quality:

❑ **Finding #1:** Breakfast and lunch production records did not have the following information filled in or were missing the following categories based on the [Production Record Requirements](#) ("Must Haves and Nice to Haves") (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>):

- Planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb case, 2-96 count case)
- Amount leftover for all items on production record
- Milk usage by each type (or a [milk recipe](#) can be used and total milk usage can be recorded) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/milk-recipe-instructions.pdf>)
- Substitutions made to original plans
- Substitutions made for students with special dietary needs

While there is no required production record template, there are some examples that may be used on our [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). There are production record templates that have space for one, two, or three age/grade groups on each template.

In addition, it is important to be specific on production records about the identity, brand, and description of the items served. Instead of "cereal, assorted", list all types/flavors of cereal separately. "Cereal" does not indicate exactly what was served.

Production records should also list out each item that is offered. For example, the Newton alternate entrée option contains four items that students can pick and choose from under OVS. Since students are not required to select all four items, each item should be listed separately on the production record so usage can be tracked. This would also apply to the daily salad and dinner rolls option and the rotini with meat sauce that was offered during the week of review.

Corrective Action Needed: Submit one week of completed production records for both breakfast and lunch with all of the production record "Must Haves" completed.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

Allowable Costs

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found on our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

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>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ✓ **Finding #1:** The revenue reported for Wisconsin School Day Milk Program only. Revenues and expenses from paid milks are reported as nonprogram foods.
Corrective Action Needed: Please resubmit your Annual Financial Report before December 31, 2018 to correct the WSDMP reporting. **Completed onsite. No further action required.**
- ❑ **Finding #2:** The district has no written unpaid meal charge policy which was required to be in place and distributed to families by July 1, 2017.
Corrective Action Needed: Provide a timeline to update the written unpaid meal charge policy and distribute to households.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

- Adult meals pricing is based on the highest paid price reimbursable meal plus all reimbursements as adult meals may not be subsidized by the nonprofit school food service account. Thus, the same portion must be served to adults that is served to students.

Findings and Corrective Action Needed: Nonprogram foods

- ❑ **Finding #1:** Adults are provided larger portions than students for adult meals.
Corrective Action Needed: Please provide a statement that going forward, adults will be given the same portion as a student.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Processes for complaints

- All SFAs should have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

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. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). Meals served to students with special dietary needs with the signed medical statement 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). This [flow chart](#) gives guidance on special dietary needs, as well (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf).

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

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) (<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). 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>).

Findings and Corrective Action Needed: Wellness Policy

- **Finding #1:** SFA LWP meets some but not all requirements as stipulated above SFA policy states that it will develop nutrition guidelines but does not state what those guidelines are.

Corrective Action Required: Please provide a timeline for updating the above items in your policy to become compliant with the final rule.

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

Compliance Reminders:

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](#) webpage

including the [Smart Snacks in a Nutshell](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) handout (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf>).

Technical Assistance:

Beverages

Under the Smart Snacks requirement, no-calorie, low-calorie, and caffeinated beverages are not allowable for elementary and middle school students. Students in grades 6-8 have access to a no-calorie beverage a la carte option. Technical assistance was provided to the Food Service Director since Creative Minds, the review site, does not contain 6-8 students. The Food Service Director discontinued the sale of the beverage and put in an order for compliant 100% juice options that do not exceed the fl oz maximum.

Fundraisers

Minocqua Joint #1 School District currently does not have food fundraisers during the school day. If Minocqua Joint #1 School District would like to have food fundraisers in the future, please note the following fundraiser requirements under Smart Snacks.

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; SFAs have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Findings and Corrective Action Needed for Smart Snacks:

No findings or corrective action needed for Smart Snacks for Creative Minds.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

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.
- Authorized Representatives of Food Service Management Company operated SFAs are required to complete 12 hours of continuing education yearly as they function as the Food Service Director in FSMC operated SFAs.
- 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](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

- **Annual Training Requirements for All Staff**
Directors: 12 hours
Authorized Representatives of FSMC operated SFAs 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:** 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

Food Safety

- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.

Time/Temperature Control for Safety (TCS) Food

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

Time as Public Health Control

- When using "Time as a Public Health Control:"
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - 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 or heat during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Because cold items are held outside of mechanical refrigeration at Creative Minds elementary School, Time as a Public Health Control must be used.

Corrective Action Needed: Please develop a Time as a Public Health Control SOP and submit updated SOPs as attachment via email.

Buy American

Compliance Reminders:

The USDA requires that a 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, to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Technical Assistance:

Non-Compliant Products Found

The following products identified in Minocqua Joint #1 School District's storage did not have proper labeling to identify the country of origin:

- Oats- distributed by Sysco Corporation
- Granola- distributed by Post Consumer Brands
- Bug Bites graham crackers- distributed by Kellogg Sales Co.
- Ranch- manufactured in USA
- Mayonnaise- Kraft Heinz Food Company
- Parsley flakes- marketed by Independent Marketing Alliance
- Celery salt- packed in USA by McCormick and Co Inc.
- Mixed fruit, canned- packed in the USA
- Fruit juice- Akron, Ohio
- Refried beans, canned- distributed by Seneca Foods Corp.
- Diced tomatoes, canned- packed by Hirzel Canning Co. and Farms
- Potato triangles, frozen- distributed by Sysco Corporation
- Pancakes, frozen- distributed by
- Parmesan cheese- distributed by Sysco Corporation

- Yogurt- distributed by Yoplait USA, Inc.

In USDA Memo SP 38 -2017, any product that does not identify the country of origin requires certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products.

Achieving Buy American Compliance

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, “We certify that (insert product name) was processed in the U.S. and contains over 51 percent of its agricultural food component, by weight or volume, from the U.S.” This can be accepted in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the 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 prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are 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 the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (https://dpi.wi.gov/school-nutrition/procurement/procurement-manual). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed for Buy American:

❑ **Finding #1:** The cherry tomatoes were identified in Minocqua Joint #1 School District’s storage area as non-domestic from Mexico. Minocqua Joint #1 School District does not have a Buy American – Non-compliant List or SFA equivalent form for this product.

Corrective Action Needed: Begin using Non-compliant Product List forms or SFA equivalent for tracking non-domestic products. Provide a copy of a completed form for the non-compliant product currently in Minocqua Joint #1 School District’s food storage areas. Provide the completed form as corrective action. The [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx) is located on the Buy American Provision webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx).

Food Service Management Company

Commendations/Comments/Technical Assistance/Compliance Reminders

Responsibilities which the SFA may “not” delegate to the FSMC.

- Signature authority is the agreement between the SFA and the State agency to participate in the Child Nutrition Programs operated, as attested to in the permanent agreement when submitting the online contract. Thus, signature authority must remain with the authorized representative of the school in the submission of the online contract. This also means that the SFA School Food authority must submit the online contract and not FSMC employed food service director, so they may actual click the attestation button which serves as electronic signature.
- Before the monthly claims are submitted for payment, monthly edit check data must be reviewed by comparing daily meal counts to the number of eligible students to make sure accurate meals are claimed. Monthly edit checks must be reviewed by the authorized representative each month and signature-approved before claim submission, as this is the attestation to the claim’s accuracy.
- Every school year, each SFA with more than one school site must perform no less than one on-site review of the meal counting and claiming system in each school site operating the National School Lunch Program and 50% of schools operating the School Breakfast Program by February 1.

Other SFA responsibilities, which may, in part, be delegated to the FSMC, but still require oversight:

- Maintain responsibility for the implementation of free and reduced-price policy in accordance with 7 CFR 245. SFA responsibilities include conducting hearings and verifications related to applications for free and reduced-price meals.
- An employee of the FSMC may perform for the SFA various aspects of the application and certification process of eligibility for school meals programs, if a provision for this service is included in the scope of the original solicitation.
- Retain title to all USDA Foods and ensure that all USDA Foods received by the SFA, and made available to the FSMC (including processed USDA Foods in processed end products), accrue only to the benefit of the SFA's nonprofit school food service and are fully utilized therein. This provision also applies to any refunds, rebates, discounts, and credits received from processors. The SFA must ensure that the FSMC has credited it for the value of all USDA Foods received for use in the meal service in the school year, in accordance with 7 CFR 250.51(a-d).
- Ensure the FSMC maintains applicable health certification(s) and assures that all State and local regulations are being met by the FSMC in preparing or serving meals at a SFA facility.
- Establish and maintain an advisory board composed of parents, teachers, and students to assist in menu planning.
- Develop the 21-day cycle menu for the FSMC request for proposal, unless the SFA is unable to develop a cycle menu, the FSMC may develop the 21-day cycle menu as long as doing so was a requirement of the original solicitation.
- Retain control of the quality, extent, and general nature of the food service and the prices to be charged to the children for meals. This includes retaining control of the nonprofit school food service account and overall financial responsibility for the programs operated; establishing all prices for all meals served under the nonprofit school food service account (example, pricing for reimbursable meals or non-program foods, such as a la carte foods, and adult meals.)

School Breakfast Program (SBP) and 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 Minocqua

Jt 1 School District, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)
- 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: Summer food service outreach was not provided to students.

Corrective Action Needed: Please provide a statement that you will notify students of the ability to receive free summer meals.

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).