

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

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**School Food Authority:** Oneida Nation School System

**Agency Code:** 447223

**Review Date(s):** March 5-6, 2019

**School(s) Reviewed:** Oneida Nation High School

**Date of Exit Conference:** March 6, 2019

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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 a nominal charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, 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, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- Wisconsin Team Nutrition is hosting a *Teaming Up to Increase Participation* workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop) webpage (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

### Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Oneida Nation School System for the courtesies extended to us during the on-site review and for being available to answer questions and provide 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.

The DPI review team appreciates the eagerness of the staff at Oneida Nation School System for its willingness to make changes to meet school meals program regulations. The DPI review team is confident that Oneida Nation School System will continue to improve their knowledge and operation of child nutrition programs.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Meal Counting and Claiming

##### Commendations:

- ✓ Day of review meal counts were comparable to the review period meal counts.
- ✓ Edit checks are completed monthly.

##### Technical Assistance:

- **2 non-reimbursable meals were observed at lunch and 1 non-reimbursable meal was observed at breakfast.** These meal counts were taken off of the daily meal count for the day of review, so there will be no fiscal action. Even so, please encourage students to go back and take all components that make up a reimbursable meal. It increases the nutritional quality of student meals and the total reimbursement for the school.

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

**Finding #1:** Field trip meal counts are taken before students even leave for the field trip. Similar to on-site meal counts, students are only to be checked off as receiving a meal or snack *as* he or she actually receives it.

**Corrective Action Needed:** Please provide communication to teachers regarding a new field trip POS system that ensure student meals are recorded during meal service and not the morning of the field trip. Upload this communication into SNACS.

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### 2. MEAL PATTERN AND NUTRITIONAL QUALITY

##### Commendations

Thank you to the staff for their warm welcome and cooperation throughout the administrative review. Thank you, also, for all your questions, willingness to learn and quickly implement recommendations and required changes. It has been a pleasure working with your staff.

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

### **Week of Review**

Documentation from the week of review was reviewed for meal pattern compliance and the following errors were found with the documentation submitted:

**Breakfast** - no errors found.

### **Lunch-**

- Daily meat/meat alternate shortages
- Weekly meat/meat alternate shortage
- Daily grain shortage
- Weekly grain shortage
- A standardized recipe for the chicken noodle soup is needed to complete the crediting of the recipe.

High School students must be offered at least 2 oz eq grain and 2 oz eq meat/meat alternate daily. Refer to the [Lunch Meal Pattern Table](#) for daily and weekly requirements found on the [Menu Planning](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

### **Menu Planning Worksheets**

Menus must be planned to meet meal pattern requirements. To assist with this process, use a menu planning worksheet found on the [NSLP Menu Planning](#) webpage, under the Menu Planning Worksheets heading ([dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools)). Use this worksheet for 9-12 High School (Lunch) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc>).

### **Offer versus Serve**

It is important for staff to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](#) (the school year 1516 is the most recent) and the [Offer Versus Serve Webcast](#) can be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts>).

In summary for OVS, the school must OFFER the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal at lunch. From these offering, students must SELECT at least three full, different, food components, one of which is ½ cup fruit and/or vegetable.

At breakfast, students are required to have at least three food items on their trays, one of which is ½ cup fruit and/or vegetable, or a combination.

As a reminder, students do not have to take milk.

### **Signage**

Because the vegetables on the salad bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. [Salad Bar Signage Template](#) can be found on our [Signage](#) webpage, under the heading Additional Signage Resources (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

### **Standardized Recipes**

Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent

quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes.

Recipes should be standardized to your kitchen to reflect the products and practices that are used in your kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

For more recipe ideas, refer to [USDA's What's Cooking? Recipes](https://whatscooking.fns.usda.gov/) that include nutritional and crediting information. They are a great resource to use in USDA School Meals Programs for cooking healthy and tasty recipes. Note: even though USDA refers to these as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they have been tried, tested, and adapted to your food service operation. (https://whatscooking.fns.usda.gov/).

We also encourage viewing the webcast, [What's the Yield with Standardized Recipes?](https://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (https://dpi.wi.gov/school-nutrition/training/webcasts#sr).

The following recipes were either missing or not standardized to your kitchen. Use [2 grade group template](#) if serving different serving sizes for K-8 and 9-12 (Pozole).

The following recipes must be standardized to your operation:

- Spaghetti and meat sauce is served separate, not mixed together. Update the recipe instructions to reflect this.
- Ham and turkey sandwich recipe. The intent is for staff to create either a turkey OR a ham sandwich, however the recipe is not clear. Please update the recipe to reflect the steps to make a ham OR turkey sandwich, or separate into two recipes.
- Pozole. Must be standardized to your kitchen operation.
- Sloppy joe. Must be standardized to your kitchen operation.
- Chicken noodle soup. Must be standardized to your kitchen operation.

### **Crediting documentation**

Acceptable crediting documentation was not available for smoked deli ham and deli turkey, prior to the onsite visit. Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. This was discussed onsite, and they were obtained. Please keep this documentation for these products.

Remember, if proper documentation cannot be obtained, you should discontinue using these product(s) for school meals. More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

### **Food Buying Guide**

The Food Buying Guide currently in use is out of date. Please visit the USDA Food Buying [USDA Food Buying Guide for Child Nutrition Programs](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) to use the online version or print an up-to-date version for your binder (https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs).

Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on "food items search" and type in a specific food in

the “keywords” search box. Many different options may appear. Find the one that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.

### **Production Records**

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record the date of service, planned serving sizes, and the correct crediting of menu items. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Technical assistance was given on documenting the date of service, using volume measures (such as cups) to record portion sizes of fruits and vegetables, and using weight measures (such as ounces) to record portion sizes of meat/meat alternates and grains.

### **Fresh Fruit and Vegetable Program (FFVP)**

Remind teachers to wash hands before distributing fruit or vegetable cups.

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

☐ **Finding #2:** The following meal pattern violations were found during the week of review.

- Daily meat/meat alternate shortages. 2 oz eq meat/meat alternate is required to be offered daily.
- Weekly meat/meat alternate shortage. Only 6.25 oz eq meat/meat alternate offered; 10 oz eq meat/meat alternate is required.
- Daily grain shortage. 2 oz eq grain is required to be offered daily.
- Weekly grain shortage. Only 8 oz eq grain offered; 10 oz eq grain is required.

Refer to the [Lunch Meal Pattern Table](#) for daily and weekly requirements.

**Corrective Action Needed:** Submit a statement explaining how the above mentioned meal pattern violations will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.

☐ **Finding #3:** Extra training required on Offer versus Serve (OVS).

**Corrective Action Needed:** Have staff responsible for determining reimbursable meals attend a training on OVS. Please watch the following webcasts and submit a log that states the name of the webcast, the date it was viewed and include the name(s) and signature(s) of those in attendance.

- [Offer versus Serve webcast](#) (30 min)
- [Meal or No Meal: Offer versus Serve Lesson and Game](#) (30 min)

☐ **Finding #4:** Standardized recipes were either missing or not standardized.

**Corrective Action Needed:** Please create and/or update the recipes in use to be standardized to your operation:

- Spaghetti and meat sauce
- Ham and turkey sandwich recipe
- Pozole
- Sloppy joe
- Chicken noodle soup

*Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility*

to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

### 3. SMART SNACKS

#### Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

### 4. BUY AMERICAN PROVISION

#### Comments/Technical Assistance/Compliance Reminders

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% 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.

The following information must be recorded on a Buy American Non-Compliant Product List. *Note:* In reference the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

When completing the [Buy American Non-Compliant Product list](#) there are 4 pieces of information that must be recorded:

1. Date
2. Name of product
3. Country of origin
4. Reason
  - a. **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
    - i. *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
  - b. **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
    - i. *Ex. Blueberries are not available domestically during the months of December – June.*
  - c. **Availability** – Product(s) is not available to purchase domestically.
    - i. *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
  - d. **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)

- i. *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
- e. **Distribution-** the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
  - i. *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
- f. **Other-** Please provide a written explanation.
  - i. *Ex. The SFA received a donation of non-domestic oranges*
  - ii. *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

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

- **Finding #5:** Non-compliant products not being tracked: Bananas and Pineapple tidbits.  
**Corrective Action Needed:** Submit a [non-compliant product sheet](#) for the above mentioned products.

**5. RESOURCE MANAGEMENT**

**Non-profit School Food Service Account**

The Maintenance of Non-profit School Food Service Account area of Resource Management triggered for a Comprehensive Review.

**Technical Assistance:**

- Donations are made to the food service account by the tribe throughout the school year, as needed. However, the food service account gave back a very large sum of the tribe's contribution at the end of the 17-18 school year, as there was a surplus. **The non-profit school food service account is a protected account that contains federal and state reimbursement funds.** When funds are removed from the food service account, they are to only be for allowable costs (food, labor, equipment, supplies, etc.). **The transfer out of the food service account to the tribe at the end of the school year is inappropriate, given that it is a donation. Therefore, those funds should not leave the food service account even if there is a surplus at the end of the school year.** Either the tribe must consider this donation a *loan* or the amount donated by the tribe throughout the year must be more accurately budgeted so that a large sum is not left over at the end of the school year.
  - For private schools: during the school year, school authorities may "advance" cash (a temporary loan) from the parish or sponsoring agency fund (i.e. tribal contribution) to the food service fund. When made, an advance is reported as a revenue. An advance payback during the school year is reported as a negative revenue. **An advance must be paid back in the same year in which it occurs or it becomes a permanent transfer to the food service fund** at the end of the operating year.

- The Annual Financial Report (AFR) is a reflection of the non-profit school food service account. The beginning and ending fund balances, and the revenue and expenditures for each program, labor, food, and purchased services, must be allocated on the report appropriately and accurately.
- The [Non-program Foods Revenue Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) is required for schools selling any non-program foods beyond extra milks and adult meals (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx).

Findings and Corrective Action Needed: Non-profit School Food Service Account

**Finding #6:** Indirect costs of utilities are not assessed properly. Utility charges to the food service account are allowable so long as they are assessed appropriately. The two ways in which utilities may be assessed are to be separately metered or a current usage study by the local utility company. However, percentage based on square footage of the food service area is not an accepted method.

**Corrective Action Needed:** Please submit an explanation as to how utilities will be assessed going forward and upload this into SNACS.

**Finding #7:** Resource Management within the SFA involves multiple individuals. Certain aspects of financial management of the programs are maintained off site at a separate location, which has proven to cause some miscommunication regarding the food service fund.

**Corrective Action Needed:** A policy must be established to address the following situations: tribal contributions, food service fund management, and AFR reporting. Upload this policy into SNACS.

**Resources:**

- [AFR webcast](https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story\_html5.html)
- [AFR instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf)
- [AFR In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx)

## 6. GENERAL PROGRAM COMPLIANCE

### Civil Rights

**Commendations:**

- ✓ Civil Rights training completed annually.
- ✓ The CEP Public Release has been completed.
- ✓ All documents had the correct non-discrimination statement.

**Compliance Reminders:**

- The Public Release is to be completed annually prior to the beginning of the school year.



### On-site Monitoring

#### Technical Assistance:

- The on-site monitoring form utilized by the SFA is an outdated version.
- The forms completed for this school year do not indicate the program (SBP or NSLP). On-site monitoring forms must be completed by SFAs with more than one site. 100% of all NSLP sites must be monitored annually, and 50% of all SBP sites must be monitored annually.
- It is understandable that the food service director encourages unbiased parties to completed on-site monitoring. It is also important to consider that if the food service director completes these, he will have a better understanding of what needs to be altered at service – possibly more so than a teacher or other staff member.

#### Resources:

- [On-site Monitoring Form NSLP \(CEP\)](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-nslp-onsite-monitoring.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-nslp-onsite-monitoring.doc)
  - [On-site Monitoring Form SBP \(CEP\)](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-sbp-onsite-monitoring.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-sbp-onsite-monitoring.doc)
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### Local Wellness Policy

#### Commendations:

Oneida Nation School System is participating in outstanding and inspiring sustainability and farm to school projects. The community and schools are supportive of these initiatives and strive for what is in the best interest of their youth. Aim to incorporate these initiatives in your Local Wellness Policy (LWP) as an additional evaluation effort for wellness goals. Great work!

#### Technical Assistance:

- The LWP is to be reviewed and updated annually. Every three years, a triennial assessment is to be completed utilizing the [WellSAT](http://www.wellsat.org/default.aspx) (http://www.wellsat.org/default.aspx).
- The LWP and results of the triennial assessment must be made available to the public.

#### Findings and Corrective Action Needed: Local Wellness Policy

**Finding #8:** LWP does not contain the required components listed on the LWP checklist.

**Corrective Action Needed:** Please submit the completed LWP (or a draft). If this draft is not complete by the corrective action due date, notify the consultant and instead submit a timeline for when the LWP will be completed and board approved. Upload this into SNACS.

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### Professional Standards

#### Commendations:

- ✓ Great that all staff complete 4 hours of food safety training through the Oneida Environmental Health Department.
- ✓ Thank you to staff for attending SNSDC!

**Technical Assistance:**

- The Professional Standards trackers (manual or electronic) must include the following information:
  - Employee Name
  - Date of Hire
  - Position
  - Reporting Period (e.g. July 1, 201X – June 30, 201Y)
  - Total Training Hour Requirement
    - 12 hours (Director)
    - 10 hours (Manager)
    - 6 hour (full-time Staff) (i.e. more than 20 hours/week)
    - 4 hours (part-time Staff) (i.e. less than 20 hours/week)

Findings and Corrective Action Needed: Professional Standards

**Finding #9:** Professional Standards trackers not completed for food service employees.

**Corrective Action Needed:** Please submit trackers for each food service employee with completed trainings for this school year. If less than half of the hour requirements have been completed this school year, please submit a plan of action for how and when the remaining trainings will be completed. Upload these into SNACS.

**Resources:**

- [Professional Standards webpage](https://dpi.wi.gov/school-nutrition/professional-standards)(https://dpi.wi.gov/school-nutrition/professional-standards)
- [Professional Standards In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf)
- [Professional Standards Training Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf)
- [DPI SNT Professional Standards Training Tracker](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx)

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**Food Safety and Storage**

**Commendations:**

- ✓ Storage violation were not observed.
- ✓ The most recent food safety inspection report was publicly posted.
- ✓ Two food safety inspections were completed in the prior school year.

**Technical Assistance:**

- DATCP has oversight of Food Safety Manager Certification at each SFA. Currently, Oneida Nation School System does not have a food safety manager at the district.
- One food safety inspection conducted by Oneida Environmental Health Department should be a facility inspection and one should be completed for the food safety plan. Currently, two *facility* inspections are completed each school year.
- Employee Reporting Agreements must be completed by each employee upon hire.

- The food safety plan must have Standard Operating Procedures for field trip meals and Afterschool Snack (see *Resources*).

**Compliance Reminders:**

- The Food Safety Plan is to be site-specific for each site within the district and is to be reviewed and updated annually. It is best practice to have it reviewed annually by the food safety inspector.

Findings and Corrective Action Needed: Food Safety and Storage

**Finding #10:** Food Safety Plan not in place at the Oneida Nation High School. Staff are currently in the process of developing a plan as there used to be only one for the entire district.

**Corrective Action Needed:** Once completed, upload the Food Safety Plan into SNACS.

**Resources:**

- [DPI SNT Food Safety webpage](https://dpi.wi.gov/school-nutrition/food-safety) (https://dpi.wi.gov/school-nutrition/food-safety)

**Reporting and Recordkeeping**

**Commendations:**

- ✓ All reports have been completed, including the VCR, PLP report, FNS-10 report, and AFR.
- ✓ All records are retained for the required three years plus the current school year. All temperature logs are retained for the minimum six month requirement.

**Technical Assistance:**

- It is the responsibility of the review team to assess that the SFA ensures effective and consistent management of and communication between staff working with the school meals programs. This is **critical** to the fiscal and nutritional integrity of these programs.
  - Ex: Authorized Representative is an individual whose sole responsibilities within the programs are submitting NSLP, SBP, and ASP claims and approving invoices.
- **Best practice is to organize materials and develop procedures so that anyone could step into to a position and complete tasks per requirements. Ideally, someone should be able to do exactly as another, given the procedures of operations.**

Findings and Corrective Action Needed: Reporting and Recordkeeping

**Finding #11:** During the on-site review, staff responsibilities were unclear to both the review team and the food service team. When documents were requested, there was confusion as to who may have and/or be in charge of requested documents.

**Corrective Action Needed:** Management procedures of the following areas are required: professional standards training and tracking, food safety plan review and maintenance, recordkeeping, resource management, reporting, and USDA Foods

ordering. Ideally, there should be more than one person involved in each of these areas to ensure proper checks and balances. Upload these procedures into SNACS.

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### School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach

#### Commendations:

- ✓ SBP Outreach was completed at the beginning of the school year.

#### Technical Assistance:

- SFSP outreach is to be completed prior to the end of the academic school year to inform families of where meals are offered during the summer months.

#### Compliance Reminders:

- A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, **USDA requires 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 webpage](http://www.fns.usda.gov/summerfoodrocks) (http://www.fns.usda.gov/summerfoodrocks)

#### Findings and Corrective Action Needed: SFSP

**Finding #12:** SFSP outreach is not completed by Oneida Nation School System.

**Corrective Action Needed:** Upload a draft of the outreach poster into SNACS.

#### Resources:

- [SFSP outreach poster](https://dpi.wi.gov/community-nutrition/sfsp/outreach) (https://dpi.wi.gov/community-nutrition/sfsp/outreach)
- 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).
- For more information on Summer Feeding option contact:  
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator  
Phone: 608.266.7124; e-mail: [amy.kolano@dpi.wi.gov](mailto:amy.kolano@dpi.wi.gov)

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## 7. OTHER FEDERAL PROGRAMS REVIEWS

### Afterschool Snack Program (ASP)

#### Commendations:

- ✓ On-site monitoring is completed for ASP.

- ✓ Thank you for making an extra effort to provide snacks to students participating in a multitude of afterschool activities in different locations.

**Technical Assistance:**

- ASP on-site monitoring must be completed within the first 4 weeks of service.
- Please ensure those completing the ASP on-site monitoring forms are informed of their purpose and have an understanding of their importance.
- When completing the ASP production records, it is encouraged that snack item descriptions are specific and the oz. eq. information is documented.

Findings and Corrective Action Needed: Afterschool Snack Program

**Finding #13:** Snack counts for the ASP are not taken. The number of snacks *prepared* on the ASP production records are then recorded as snacks *served* for the ASP claims for reimbursement. **A recalculation of ASP counts from the beginning of the 18-19 school year will be completed once the new, accurate counting procedures are in place.**

**Corrective Action Needed:** Upload an explanation of how snack counts are to be accurately taken at the ASP POS and submit 30 days of corrected counts (i.e. 30 days with the new POS in place) into SNACS. **Once the corrected counts are submitted, fiscal action will be calculated.**

**Finding #14:** Two snack items served from the day of review and review period were not whole-grain rich. The Doritos and Snack Mix.

**Corrective Action Needed:** Upload whole-grain item(s) that will be offered their place into SNACS.

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## 8. COMMUNITY ELIGIBILITY PROVISION (CEP)

**Commendations:**

- ✓ The SFA notifies households of its participation in CEP.
- ✓ The CEP application, Annual Intent Forms, and other ISP documentation are maintained on file at the SFA.
- ✓ Eligibility information is maintained on file at the SFA.
- ✓ October Direct Certification (DC) run completed and maintained on file.

**Technical Assistance:**

- CEP removes the need to distribute and collect USDA Free and Reduced Price Meal applications. The need for individual student level income information is still necessary to collect from students at CEP schools for other programs (e.g., Title 1, SAGE/AGR, and Wisconsin School Day Milk Program). For a SFA that is CEP district-wide, the following application must be used:
  - [DPI Alternative Household Income Form](#): Developed to identify economically disadvantaged students who are not already on the Direct Certification list

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/alternate-household-income-form.docx>).

**Compliance Reminders:**

- DC run on April 1 for completing the CEP Annual Intent Forms.

**Resources:**

- [CEP Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf>)
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“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).”



*With School Nutrition Programs!*