



SFA Name: Menomonee Falls School District 673437  
 Administrative Review Conducted on: March 8-9, 2017  
 Sites Selected for Review: North Middle School  
Riverside Elementary School

**Date Corrective Action Plan was provided to SFA:** 3/29/2017

**Due Date for Corrective Action Plan:** 4/28/2017

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

<b>Commendations &amp; Suggestions</b>
North Middle School- Outstanding job meeting all of the requirements for breakfast and lunch. All daily and weekly meal component and food quantity requirements were met for the week of menu review.
The SFA did a fantastic job getting all the requested documentation together for the on-site reviewers.
At North Middle School, the dry storage as well as the cold storage was well organized. The items were dated and stored appropriately.
North Middle School had a white board for inventory that was exceptionally colorful, and the inventory was well documented.
The schools had a nice variety of fresh fruit (carrots, apples, radishes, sliced cucumber, tomatoes) built into their menus.
At Riverside Elementary the lunch staff was approachable and helpful.

<b>Other areas of Technical Assistance (NOT requiring Corrective Action)</b>
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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.
SFA On-Site Monitoring - Technical assistance was provided on completing the on-site monitoring forms to spread out the reviews to allow enough time to monitor the breakfast and lunch services at each school.
Professional Standards - Technical Assistance was provided to come up with a plan to complete the rest of the training hours for the School Nutrition Program Managers.
Certification and Benefit Issuance - Technical Assistance was provided to show math calculation on the application, which will be done by the confirming official on each application. The SFA chooses to confirm each application.
Food Safety - Technical Assistance was provided to remind the lunch staff must wash their hands before handling/serving the food. When second entrees are provided, they must be placed on a clean tray instead of an already used tray
Food Safety - Technical Assistance was provided that temperature logs must be kept for the dry storage.
Food Safety - Health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publically visible location at the site.
North Middle School was providing extra grain items at no charge to the students for breakfast which should have been part of a reimbursable meal or sold a la carte.
For the day of review, the production record had incorrect portion sizes listed for the yogurt, french toast stick, and for the juice at breakfast. This was discussed with the SFA. The portion sizes on all production records should be revised to show the correct offered/planned portion size.

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

Finding #1
410. For the week of menu review, the K-5 lunch menu did not meet the minimum daily requirement of 1 ounce equivalent grain. A grain was provided, however the minimum required portion size was not met on Thursday at Riverside Elementary.
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. <a href="http://healthymeals.nal.usda.gov/">http://healthymeals.nal.usda.gov/</a>
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-5: 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

410. For the week of menu review, the K-5 lunch menu did not meet the minimum daily requirement of 3/4 cup vegetable. Vegetables were provided, however the minimum required portion size was not met on Tuesday at Riverside Elementary.

### 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-5: 3/4 cup of vegetable.

### 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**

<b>Finding #3</b>
204. The SFA is using an electronic system to identify error-prone applications, but the system did not identify these applications correctly. The system identified one application as error prone when it was not an error prone application.
<b>Technical Assistance Provided</b>
During the review, correctly identifying error-prone applications and ensuring the software is using the correct Income Eligibility Guidelines was discussed with the SFA. The SFA must identify error-prone applications in accord with the process outlined in the Eligibility Manual for School Meals, Chapter 4.
<b>Regulation / Citation and Summary</b>
Eligibility Manual Chapter 4A: Error-prone applications are those applications within \$100 per month and \$1200 per year of the applicable Income Eligibility Guidelines.
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with the requirements for identifying error-prone applications, the SFA must provide the State Agency with an assurance that staff conducting verification understand these requirements, and the SFA must put a plan in place to ensure future compliance with the electronic software. Please submit the assurance and plan to the State Agency. Include the date the software was or will be corrected. Additionally, SFA staff will need to complete the Verification of Eligibility training found in the School Nutrition Toolbox at <a href="http://www.schoolnutritiontoolbox.org/snt-v3/index.php">http://www.schoolnutritiontoolbox.org/snt-v3/index.php</a> .
<b>SFA Response</b>

<b>Finding #4</b>
803. The SFA does not have a procedure in place for handling civil rights complaints.
<b>Technical Assistance Provided</b>
During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; 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; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded.
<b>Regulation / Citation and Summary</b>
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.
<b>SFA Suggested Guidance for Compliance</b>
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.
<b>SFA Response</b>

<b>Finding #5</b>
1000. Finding The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include a plan for measuring implementation.
<b>Technical Assistance Provided</b>
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. <a href="http://www.fns.usda.gov/tn/local-school-wellness-policy">http://www.fns.usda.gov/tn/local-school-wellness-policy</a>
<b>Regulation / Citation and Summary</b>

210.30 Local School Wellness Policy. (c) Content of the plan. At a minimum, local school wellness policies must contain: (1) Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. In developing these goals, local educational agencies must review and consider evidence-based strategies and techniques; (2) Standards for all foods and beverages provided, but not sold, to students during the school day on each participating school campus under the jurisdiction of the local educational agency; (3) Standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency that; (i) Are consistent with applicable requirements set forth under §§ 210.10 and 220.8 of this chapter; (ii) Are consistent with the nutrition standards set forth under § 210.11; (iii) Permit marketing on the school campus during the school day of only those foods and beverages that meet the nutrition standards under § 210.11; and (iv) Promote student health and reduce childhood obesity. (4) Identification of the position of the LEA or school official(s) or school official(s) responsible for the implementation and oversight of the local school wellness policy to ensure each school's compliance with the policy; (5) A description of the manner in which parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public are provided an opportunity to participate in the development, implementation, and periodic review and update of the local school wellness policy; and (6) A description of the plan for measuring the implementation of the local school wellness policy, and for reporting local school wellness policy content and implementation issues to the public, as required in paragraphs (d) and (e) of this section.

#### **SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for Local School Wellness Policies, the SFA must submit a written assurance that the appropriate staff understand the requirements for the wellness policy. The SFA must also develop a Local Wellness Policy that has all of the required areas and submit this to the State Agency. If the SFA needs additional time to develop the wellness policy and have it approved by the school board, the SFA must submit a detailed timeline that shows when each step will be completed. Once the policy is in place it must be submitted to the state agency for review. Submit the name and title of the SFA representative that will oversee this process and ensure compliance.

#### **SFA Response**

#### **Finding #6**

1003. The appropriate people were not given the option to be involved in the development, implementation, periodic review, and update of the Local School Wellness Policy.

#### **Technical Assistance Provided**

During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.

#### **Regulation / Citation and Summary**

210.30 Local School Wellness Policy (d) Public involvement and public notification. Each local educational agency must: (1) Permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and periodic review and update of the local school wellness policy; (2) Inform the public about the content and implementation of the local school wellness policy, and make the policy and any updates to the policy available to the public on an annual basis; (3) Inform the public about progress toward meeting the goals of the local school wellness policy and compliance with the local school wellness policy by making the triennial assessment, as required in paragraph (e)(2) of this section, available to the public in an accessible and easily understood manner.

#### **SFA Suggested Guidance for Compliance**

To come into compliance with this requirement the SFA must submit a statement that moving forward the SFA will advertise the ability to participate in the development and updating of the school wellness policy. The SFA should submit supporting documentation such as a flyer, or a website link that informs the public of the ability to participate.

#### **SFA Response**

#### **Finding #7**

1005. 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 an 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**

<b>Finding #8</b>
215. The SFA did not complete verification by November 15.
<b>Technical Assistance Provided</b>
During the review, completing verification on time was discussed with the SFA. The SFA must complete verification by November 15.
<b>Regulation / Citation and Summary</b>
245.6a(b) Deadline and extensions for local educational agencies—(1) Deadline. The local education agency must complete the verification efforts specified in paragraph (c) of this section not later than November 15 of each school year.
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with the due date of verification, the SFA must provide the State Agency with an assurance that staff conducting verification understand this requirement, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. This plan should include, but is not limited to include the person(s) by position(s) who will be involved, specific tasks to be completed, and dates for completion.
<b>SFA Response</b>



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<b>Finding #9</b>
810. 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.
<b>Technical Assistance Provided</b>
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. <a href="http://www.fns.usda.gov/fns-nondiscrimination-statement">http://www.fns.usda.gov/fns-nondiscrimination-statement</a>
<b>Regulation / Citation and Summary</b>
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 subrecipients 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.
<b>SFA Suggested Guidance for Compliance</b>
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.
<b>SFA Response</b>

<b>Finding #10</b>
502. Offer versus Serve reimbursable meal signage is not posted, including the requirement for students to select at least 1/2 cup fruit or vegetable.
<b>Technical Assistance Provided</b>
Requirements under Offer vs. Serve include identifying, near or at the beginning of the serving line(s), the food items that constitute a reimbursable meal, including the requirement that students must take at least 1/2 cup of the fruit or vegetable component. It was determined during the review that the SFA did not have meal signage posted that identifies the food items that constitute a reimbursable meal. The SFA acknowledged the finding and will implement needed changes immediately.

<b>Regulation / Citation and Summary</b>
210.10 (a)(2) Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s).
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with the requirements of Offer vs. Serve, the SFA must state that reimbursable meal signage is now posted for the students and provide the location where it was posted.
<b>SFA Response</b>

<b>Finding #11</b>
1601. The SFA has not performed SFSP outreach.
<b>Technical Assistance Provided</b>
It was determined during the review that the SFA has not performed SFSP outreach. 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.
<b>Regulation / Citation and Summary</b>
210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with this requirement, the SFA must submit an assurance to the State Agency that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.
<b>SFA Response</b>

<b>Finding #12</b>
126. Not all selected applications were approved correctly. The household provided an annual income, but the SFA did not document that it verified with the household that the income was still current and that the household met the special situations that allow for annual income to be accepted.

<b>Technical Assistance Provided</b>
During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that any annual income listed by the household is indeed current income and that the household qualifies for the special situations identified by USDA that allow annual income to be reported on the meal application. For more information, see the Eligibility Manual for School Meals, Chapter 3.
<b>Regulation / Citation and Summary</b>
Eligibility Manual, Chapter 3: If the household provided only annual income, the LEA must ensure that the amount is an accurate reflection of the household’s current income.
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with the requirements for determining applications, the SFA must provide the State Agency with an assurance that staff administering the free and reduced lunch program 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. Applications found to be incorrectly determined during the review must be corrected, and the corrected application and date of the correction must be submitted to the State Agency. If the SFA is unable to correct the error because of missing/incomplete information from the household, after allowing the household an adequate amount of time to respond, the SFA must send a letter of adverse action and advise the State Agency of the date that this letter was sent.
<b>SFA Response</b>

<b>Finding #13</b>
207. The total applications on file do not match the number reported on the most recent FNS-742.
<b>Technical Assistance Provided</b>
During the review, verifying the correct number of applications and reporting the correct number on the FNS 742 was discussed with the SFA. The SFA must determine the number of applications to verify in accord with the process outlined in the Eligibility Manual for School Meals, Chapter 4 and record the numbers of all applications on file correctly. The FNS-742 should be filled out based on applications from October 1st of the current school year.
<b>Regulation / Citation and Summary</b>
245.6a(h) Verification reporting and recordkeeping requirements. By February 1, each local educational agency must report information related to its annual statutorily required verification activity, which excludes verification conducted in accordance with paragraph (c)(7) of this section, to the State agency in accordance with guidelines provided by FNS.
<b>SFA Suggested Guidance for Compliance</b>

To come into compliance with the requirements for listing the total number of applications, the SFA must provide the State Agency with an assurance that staff conducting verification 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.

**SFA Response**

**Finding #14**

501. 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 #15**

1105. The SFA is selling items that do not meet the Smart Snacks nutrition standards for beverages sold to middle school students during the school day.

**Technical Assistance Provided**

<p>During the review, beverage rules under Smart Snacks were discussed with the SFA. The SFA must ensure that all beverages meet the requirements, based on the level of the school (elementary, middle, high) where they are sold. The SFA should review Smart Snack requirements online at: <a href="http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks">http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks</a></p>
<p><b>Regulation / Citation and Summary</b></p>
<p>Smart Snacks interim final rule: Middle School: Plain water or plain carbonated water (no size limit); Low-fat milk, unflavored (≤2 fl oz.); Non-fat milk, flavored or unflavored (≤2 fl oz.), including nutritionally equivalent milk alternatives as permitted by the school meal requirements; 100% fruit/vegetable juice (≤2 fl oz.); and 100% fruit/vegetable juice diluted with water (with or without carbonation), and no added sweeteners (≤2 fl oz.).</p>
<p><b>SFA Suggested Guidance for Compliance</b></p>
<p>To come into compliance with the requirements for Smart Snacks, 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, which must indicate that all competitive items sold are now in compliance with Smart Snacks rules. Please include the date in which all non approved items were removed and the person by position who will oversee that these items are not sold.</p>
<p><b>SFA Response</b></p>
Empty response box

<p><b>Finding #16</b></p>
<p>1403. The SFA did not have a copy of their written food safety plan available at the reviewed site(s).</p>
<p><b>Technical Assistance Provided</b></p>
<p>During the review, the food safety plan was discussed with the SFA. The SFA must have a food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures.</p>
<p><b>Regulation / Citation and Summary</b></p>
<p>210.13(c) Food safety program. The school food authority must develop a written food safety</p>

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 the State Agency with an assurance that the appropriate staff understand the requirements for a food safety plan. The assurance should include; a statement that the food safety plan will contain all required fields, that the food safety plan will be available at each site within the SFA, and that training will be completed for all appropriate SFA staff. In addition to the assurance an electronic copy of the food safety plan must be submitted for review.

#### **SFA Response**

#### **Finding #17**

Resource Management – NonProgram Food Revenue  
Prior to the review, the SFA had not determined compliance with Revenue from Nonprogram Food requirements.