

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

School Food Authority: Menominee Indian School District **Agency Code:** 723434

School(s) Reviewed: Menominee Indian Middle School

Review Date(s): 4/10/18-4/12/18

Date of Exit Conference: 4/11/18

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. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [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](#) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](#) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.usda.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](#) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](#) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Menominee Indian School 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.

COMMUNITY ELIGIBILITY PROVISION (CEP)

Commendations/Comments/Technical Assistance/Compliance Reminders

- It is necessary to maintain all certification documents supporting participation in CEP. REMINDER: the current identified student percentage (ISP) and claiming percentages are approved through the 2017-2018 school year for a four year cycle. CEP participating schools will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages). SFA must renew their CEP contract for the 2018-2019 school year.
- SFA missed the April 1st deadline to re-apply for CEP eligibility. Please contact DPI if the SFA would like to continue participating in CEP for the 2018-2019SY.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- Menominee Indian School District operates under the Community Eligibility Provision (CEP), providing free breakfast and lunch meals to all students district wide.
- Direct certification match runs were being conducted in the appropriate time frames.
 - All SFAs are required to distribute a public release before the start of the school year. For CEP schools please use the modified [CEP public release](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-public-release.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-public-release.doc>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Employment Office

Findings and Corrective Action Needed: Certification and Benefit Issuance

- Finding 1:** An outdated public release was used for the current school year. It had the wrong non-discrimination statement on it and was not for CEP schools.

Corrective Action Needed: Please submit an updated copy of the public release that is specific to the SFA.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- Verification Collection Report was completed by February 1.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFA uses a software system, but chooses to do manual counting and claiming. SFA uses the average daily participation percentage and the daily meal counts for claiming. While reviewing the March claim, there was one day where students were double counted for meals. SFA would manually eliminate the second meals, so they were not claiming students twice. This only happens periodically and was not seen in the two previous month's claims. The manual edit checks were accurate.
- The consultant worked with the SFA to run the required edit check for the current month of April. The numbers did not match the daily participation numbers. It was noted that the software was claiming adults under the student's category. Based on this observation, the SFA should work with their software company to establish the proper parameters for counting and claiming, so it can be done through the system rather than manually.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Menominee Indian School District is going above and beyond to serve the needs of its students. The food service director is spearheading projects in the greenhouse, garden, and a future aquaponics system, which provide wonderful learning opportunities for students. All the food service staff were incredibly welcoming and helpful while we were onsite.

Comments/Technical Assistance/Compliance Reminders

Portion Sizes

Planned portion sizes of fruits and vegetables could be better communicated to food service staff. On the day of observation, watermelon slices were served, but the planned portion size listed on the production record was "1 cup." After discussion with the serving staff, it was found that the slices were cut to be approximately $\frac{3}{4}$ cup each. The production records should either say " $\frac{3}{4}$ cup" or "1 slice." Additionally, there was confusion over the crediting of a full orange, which could have led to non-reimbursable breakfasts being served if technical assistance was not given prior to breakfast observation (see corrective action below). One whole orange credits as $\frac{1}{2}$ cup fruit. It would be helpful for the menu planner to provide serving staff with clearer guidance on the crediting and planned portion sizes of certain fruits. Technical assistance was given the different ways this could be communicated (e.g., menu planning worksheets, pre-filled production records, or a reference sheet to be used in the kitchen).

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 [Menu Planning](#) webpage, under the Menu Planning Worksheets heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Production Records

Production records should reflect actual planned number of servings and actual usage. On many days of the week of review, the actual usage was recorded as the same number for every food item.

However, the middle school implements Offer versus Serve (OVS), which means that students do not need to take everything that is offered. Remember that accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Continue to work with all staff members to record planned usage, actual usage, and leftovers.

Training

Anyone involved with the United States Department of Agriculture (USDA) School Meal Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative 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.

- **Finding 2:** It is required to post signage visible to the students that indicates the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable. The current lunch signage does not include the requirement that students must take at least $\frac{1}{2}$ cup fruit, vegetable, or combination. Breakfast signage was not posted. Breakfast signage should list the three components and the four items offered, and must communicate to students that under Offer versus Serve, they must select at least three food items, one of which must be at least $\frac{1}{2}$ cup of fruit, vegetable, or a combination of fruit and vegetable. Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Corrective Action Needed: Please submit a photo of the updated lunch signage and breakfast signage posted at the middle school.

- **Finding 3:** On the day of observation, three non-reimbursable breakfasts were observed. Each of the three meals was non-reimbursable because it did not contain three items. At breakfast, students must leave the line with three food items including $\frac{1}{2}$ cup of fruit and/or vegetable. Food service staff and point-of-sale staff at the middle school need further Offer versus Serve (OVS) training. Technical assistance was given onsite about what students must take to have a reimbursable meal, but there was still confusion at both breakfast and lunch. An [OVS webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) is posted on our training page that may be used for training staff (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).

Fiscal action will be assessed for the three non-reimbursable breakfasts.

Corrective Action Needed: Please submit a written plan detailing how you will ensure that all food service staff at the middle school are trained in OVS. Include the date of the training, who attended, and what resources were used.

- Finding 4:** The Sara Lee bread served during the week of review is not whole grain-rich (WGR). The terms “wheat” or “made with whole grains” on a product label do not necessarily mean that a product is WGR. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as WGR. Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients. USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying WGR products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>). At the time of the onsite review, a different WGR bread product was in stock and was also being used, but per the food service director, the Sara Lee bread was still be used as well.

Corrective Action Needed: Please submit a written statement confirming that the non-WGR Sara Lee bread will no longer be served.

- Finding 5:** Two days during the week of review (March 19-23, 2018) only offered $\frac{1}{2}$ cup of fruit at breakfast. Students of all grade levels must be offered 1 cup of fruit each day at breakfast.

Corrective Action Needed: Please submit one week of completed breakfast production records showing that 1 cup of fruit is offered daily. Please also submit a written statement explaining what you would add to the menu days of March 19 and 20 to offer 1 cup of fruit.

- Finding 6:** The week of review did not meet the weekly grain requirement at breakfast. The alternate entrée of cereal provides 1 ounce equivalent (oz eq) of grain daily. Over the course of the week, this totals 5 oz eq. Students in grades 6-8 must be offered 8 oz eq grain weekly. The cereal must be paired with another 1 oz eq of either grain or meat/meat alternate (M/MA) on at least three days to meet the weekly requirement.

Corrective Action Needed: Please submit one week of completed breakfast production records showing that the weekly grain requirement of 8 oz eq is met.

- Finding 7:** The week of review did not provide adequate beans/peas/legumes. Only $\frac{1}{4}$ cup of kidney beans was offered, and students in all grade levels must be offered $\frac{1}{2}$ cup of beans/peas/legumes over the course of the week. See the [Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) for reference (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>). Please note that the dark green vegetable subgroup could not be assessed because no label was available for the salad mix that was served twice during the review week. Once the label is obtained, the adequacy of the dark green vegetable subgroup will be assessed.

Corrective Action Needed: Please submit a written statement explaining what you will add to the week of review to provide $\frac{1}{2}$ cup of beans/peas/legumes, and also submit one week of completed lunch production records to show that all vegetable subgroup requirements are met. Additionally, please send in the label (including the ingredient list) for the salad mix. If the salad

mix consists of vegetables from different subgroups, please submit documentation that states what the breakdown is.

- **Finding 8:** Prior to lunch observation on the day of review, it was noted that only $\frac{1}{2}$ cup vegetable was planned for the day. Technical assistance was given on the requirement to offer $\frac{3}{4}$ cup vegetable daily, and the head cook corrected the problem by adding $\frac{1}{4}$ cup of fresh vegetables to the line. Prior to breakfast observation, it was noted that only $\frac{1}{4}$ cup fruit (half an orange) was planned for the day. Technical assistance was given on the requirement to offer 1 cup fruit daily, and the head cook added $\frac{1}{2}$ cup canned fruit to the line. Please review the [breakfast and lunch meal pattern tables](#) to ensure that all meal pattern requirements are met each day and week (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables>).

Corrective Action Needed: Please submit one week of completed breakfast and lunch production records to show that all daily fruit and vegetable requirements are met.

- **Finding 9:** Acceptable crediting documentation was not available for several products used during the week of review. Processed foods that are not listed in the USDA Food Buying Guide for School Meal Programs must be accompanied by product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting. Please provide crediting information for these product(s) by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the products. If proper documentation cannot be obtained, you should discontinue using these products for school meals. More information about crediting documentation can be found on the [Menu Planning](#) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

Corrective Action Needed: Please submit crediting documentation for the following:

- Sausage patty (CN label or PFS)
- Meatballs (CN label or PFS)
- Fish sticks (CN label or PFS)
- Hamburger bun (nutrition facts label and ingredient list)
- Sub bun (nutrition facts label and ingredient list)

- **Finding 10:** There was no standardized recipe on file for the meatball sub. Standardized recipes are required for all menu items that have more than one ingredient. 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 in each production kitchen to reflect the products and practices that are used in that 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 [Meal Planning](#) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Corrective Action Needed: Please submit a standardized recipe for the meatball sub.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

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 costs associated with nonprogram foods, 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.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

- “And Justice for All” posters are posted in public view where the program is offered.
- The civil rights training was completed by all staff in the schools and documentation was available for review.
 - The [Civil Rights Self-Evaluation Compliance](#) form was completed and on file by October 31 (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).
- SFA had a process in place for handling student discrimination complaints.

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. 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>).

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, **“This institution is an equal opportunity provider.”** Either of these statements must be in the same size font as the other text in the document.

Findings and Corrective Action Needed: Civil Rights

- Finding 11:** SFA did not have the non-discrimination statement on the menus.

Corrective Action Needed: Please submit a copy of the menu with the non-discrimination statement on it.

- Finding 12:** The “And Justice for All” poster and health inspections were posted in the kitchen which closed after meal service. The poster and the health inspection should be placed in a public area that does not close after meal service.

Corrective Action Needed: Please move the poster and the health inspection report to a public area that does not close after meal service. **Corrected on site, no further action required.**

On-site Monitoring

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.

- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on our [Community Eligibility Provision \(CEP\)](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) webpage, under the resources for currently participating sites section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

Findings and Corrective Action Needed: Onsite Monitoring

- Finding 13:** On-site monitoring for breakfast and lunch was only completed at one of the schools.

Corrective Action Required: Please complete the lunch on-site monitoring for the other two schools and the breakfast on-site monitoring form for one more school. Submit the completed on-site monitoring forms back to the consultant.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFA had a wellness policy on file and it met all of the minimum requirements. Additionally, the SFA created a steering committee for the wellness committee. Great Job!

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

Smart Snacks Rule

At the time of the on-site review there were no food or beverage fundraisers occurring at Menominee Indian Middle School. If any food or beverage fundraisers 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>).

Findings and Corrective Action Needed: Smart Snacks

- Finding 14:** There is a beverage vending machine in the middle school cafeteria that sells plain water, low-calorie sports drinks, and flavored water. The only allowable beverages that may be sold a la carte to grades 6-8 are plain water, milk, and 100% fruit juice. For more information, see our [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) handout (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>)

Corrective Action Needed: Please submit a written statement confirming that the G2 and Propel flavored waters will no longer be sold to middle school students during the school day.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established regulations for annual training standards for all school nutrition program directors, managers, and staff which must be tracked.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, 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>).

Findings and Corrective Action Needed: Professional Standards

- Finding 15:** Staff have not completed the required training hours for the school year. The SFA used CPR, a 6-hour class, as part of their training hours. CPR is not part of the School Nutrition trainings.

Corrective Action Needed: SFA stated that they did a 2-day training at the beginning of each year, where new updates to food service are reviewed. Please provide documentation from the 2 day training or timeline for staff to meet the required training hours.

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

- Water fountains were in the cafeteria and students had access.

Food Safety and Storage

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view.

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Food Safety Plans

- The Food Safety Plan was available.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site. SFA should have a SOP for meals provided on field trips.

Findings and Corrective Action Needed: Food Safety and Storage

- Finding 16:** Food safety plan was on site, but not filled in or site specific.

Corrective Action Needed: Review entire food safety plan and update as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review page as an attachment to assigned DPI Nutrition Program Consultant via email.

- Finding 17:** Food safety plan did not have the uncategorized menu items listed or placed into the Process 1, 2, and 3 page. It also did not have the equipment list completed.

Corrective Action Needed: Categorize all menu items on chart for Menu Items Categorized by Process 1, 2, or 3. Submit updated chart & equipment list to the consultant.

- Finding 18:** SFA did not have the Food Employee Reporting Agreements signed and on file. This form was created by DATCP and WI Health Department and must be signed by all staff working in food service.

Corrective Action Needed: Have all food service staff fill out the agreement. Submit a copy of one of the completed agreements as an attachment via email.

- Finding 19:** Standard operating procedures (SOPs) are not site-specific.

Corrective Action Needed: Remove or adapt SOPs to reflect site-specific procedures. Submit a statement that SOPs were reviewed and made site-specific.

- Finding 20:** Only one food safety inspection was being completed per year. There is a MOU with DATCP stating that "DATCP or its agents will conduct a minimum of two inspections based on Wis. Admin. Code requirements, while school is in session, each State fiscal year (July 1-June 30), of every school food service facility participating in the NSLP or SBP."

Corrective Action Needed: Submit documentation that SFA has reached out to the local sanitarian for two food safety inspections for the current school year. If documentation is not on file, reach out to local sanitarian and request another inspection.

- Finding 21:** Temperature logs were not kept for the dishwasher.

Corrective Action Needed: Please submit a copy of dishwasher temperatures for one week.

Buy American

Comments/Technical Assistance/Compliance Reminders

The USDA requires that a School Food Authority (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.

Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. 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. Technical assistance was given on checking your distributor's website to see if products are identified as being products of the U.S.

There are limited exceptions to the Buy American provision which allow for the purchase of nondomestic products in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions. In these cases, food service must complete a noncompliant product list for each nondomestic product to justify its purchase.

More information can be found on our [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

Finding 22: The following products were identified in the SFA's storage area as nondomestic and were not included on a noncompliant product list:

- Grapes – Chile
- Cucumbers – Honduras
- Canned pineapple – Indonesia
- Granulated garlic – USA and China
- Canned olives – Spain

Corrective Action Needed: Complete a Noncompliant Product List for these nondomestic products. Provide the completed list for the above products as corrective action. A [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you for keeping all records on file for the recommended time frame.
- There are additional record retention rules for CEP. "LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP." Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

Breakfast Promotion

A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Summer Meals

SFA operates the summer meals program and promotes for it every year.

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snacks

Comments/Technical Assistance/Compliance Reminders

- Area Eligible Afterschool Snacks were all claimed at the free rate.

Findings and Corrective Action Needed

- Finding 23:** SFA discontinued the Afterschool Snacks program for the month of April through the rest of the school year.

Corrective Action Required: Please update your contract to state that SFA is no longer participating in the program. Let the consultant know upon completion, so the contract can be approved.

Fresh Fruit and Vegetable Program (FFVP)

Comments/Technical Assistance/Compliance Reminders

Nutrition Education and Promotion

While not required every time FFVP snack is served, teachers are encouraged to provide nutrition education to students regarding their snack, especially on days when the fruit or vegetable is unfamiliar to most students. Check out 78 new fruit and vegetable fact sheets created by the School Nutrition Team and posted on our [FFVP Promotion](#) webpage (<https://dpi.wi.gov/school-nutrition/ffvp/promotion>)!

Findings and Corrective Action Needed: FFVP

- Finding 24:** Administrative labor hours are being claimed and hours are being tracked, but the FFVP tasks performed during this time is not tracked. To determine whether grant funds are being allocated and claimed appropriately, it is necessary to know what tasks are actually performed. An Employee Time Sheet is posted on our [FFVP](#) webpage that may be used for tracking administrative labor (<https://dpi.wi.gov/school-nutrition/ffvp>).

Corrective Action Needed: After submitting February's FFVP claim, please submit a completed time sheet that supports the administrative labor claimed that month.

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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

