

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

School Food Authority: St. Jeromes

Agency Code: 117497

School(s) Reviewed: St Jeromes

Review Date(s): Nov. 20-21, 2017

Date of Exit Conference: Nov. 21, 2017

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, 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](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- 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](http://www.fns.usda.gov/healthierschoolday) 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](http://smarterlunchrooms.org) 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) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Jerome's for the courtesies extended to the team 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. Jacklyn Stauffacher should be commended all her efforts regarding the NSLP. She was organized and positive throughout the review. She is a wonderful asset to St. Jerome's.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Nice job of organizing documents and having them available for the review.

Commendations/Comments/Technical Assistance/Compliance Reminders

Disclosure

- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Verification

Nice job of using the tracking tool for the verification process.

Commendations/Comments/Technical Assistance/Compliance Reminders

Verification is only required when eligibility is determined through the application process, and is not required for eligibility determinations made through the direct certification process. Each year schools must annually verify eligibility of children from a sample of household applications approved free and reduced price benefits for that school year. **Technical assistance** was provided.

Findings and Corrective Action Needed: Verification

Finding: The finding was that verification had been conducted, but the school verified too many applications than what was required per regulation.

Corrective Action Needed: Please review the verification webcast on the School Nutrition website and the sampling methods for verification. Please submit a statement of understanding regarding the sampling methods used for verification.

Meal Counting and Claiming

Federal reimbursement is provided for each meal that meets program requirements and is served to eligible students. To obtain this reimbursement school personnel must accurately count, report and claim the number of meals actually served in the respective eligibility categories. There are different ways to count meals by category. Your procedures must ensure meals counted meet the meal pattern requirements, are served to eligible students and are counted daily category.

Commendations/Comments/Technical Assistance/Compliance Reminders

Technical assistance was provided to school on reimbursable meal counting and claiming.

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ **Finding:** The finding was that the *Point of Service* does not have an acceptable process in place for claiming meals. The process is not a clear and does not reflect an accurate method of claiming reimbursable meals. Reviewer noted errors with how the process was conducted. It was observed that when a student did not take a full reimbursable meal those food items should have been charged as a non-program food charge and were not. A full recalculation of meals is required back to the start of the school year for both breakfast and lunch.

Corrective Action Needed: Please correct the process and submit a statement on what this new process is. Also, submit 30 operating days of corrected data for both breakfast and lunch. This means submit me the counts used for claiming of breakfast and lunch. In addition, submit a picture of the new line setup.

❑ **Finding:** The finding was that kindergarten students were not participating in the breakfast program, it was noted not all parents wanted this option for their student. Per the signed permanent agreement it states, in point number 4, *between school nutrition programs and Wisconsin Department of Public Instruction, serve meals each day school is in session a full day.* It is not acceptable to allow all students no meal access because a few families do not want it for their students. The students that qualify for a meal benefit need to have access to the breakfast program.

Corrective Action Needed: Submit a statement on how this will be corrected.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at St. Jerome School for providing documentation prior to the review and while on-site. The food service director was friendly, helpful and clearly willing to learn and make corrections where needed. Your dedication to serving students makes a difference!

Comments/Technical Assistance/Compliance Reminders

Offer versus Serve (OVS)

Under Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered from the three components (grain [and optional meat/meat alternate], fruit/vegetable, and milk). An item is defined as 8 fluid ounces of milk; ½ cup of fruit and/or vegetable; and 1 ounce equivalent (oz eq) of grain (and optional meat/meat alternate). In order to have a reimbursable meal, students must select at least 3 food items, one being at least ½ cup of fruit and/or vegetable.

At lunch, all five components (grain, meat/meat alternate, fruit, vegetable, milk) must be offered in the daily minimum quantities. Students must select at least 3 full components, one being at least ½ cup of

fruit and/or vegetable in order to have a reimbursable meal. Visit the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) page for additional OVS guidance (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

As long as students have selected a reimbursable meal, they cannot be required to take any additional items. For example, if the student has selected pizza (which credits as a full meat/meat alternate and full grain component) along with ½ cup peas, they cannot be required to take fruit. Additionally, students must have the option to decline the hot vegetable as long as they have select at least ½ cup of fruit, vegetable or a combination of the two.

Milk and juice cups for breakfast are both stored in the same cooler. As milk and fruit are two separate components which must both be offered as part of the reimbursable meal, it is important to clearly communicate to students that they are able to select both the milk and the juice if they would like.

Meal Pattern Requirements

The meal pattern for Child Nutrition Programs was updated as part of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 with many of the updates to the National School Lunch (NSLP) and School Breakfast Program (SBP) implemented on July 1, 2012. The updated meal pattern requires specific daily and weekly minimum offerings for meat/meat alternate and grains for each age/grade group. All grains offered with reimbursable meals must be whole grain-rich. The updated meal pattern created separate components for fruits and vegetables with weekly requirements outlined for the five required vegetable subgroups (dark green, red/orange, beans and peas [legumes], starchy, and other). More information regarding the updated meal pattern can be found on the [Menu Planning](http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning) webpage (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning>).

When multiple entrées are offered, the weekly minimum meat/meat alternate is determined by the sum of the daily meat/meat alternate minimums for the week (the daily minimum is determined by the entrée offering the least amount of meat/meat alternate). The same is true for determining the weekly grain minimum.

- As the weekly grain minimum is 8 oz eq and the weekly meat/meat alternate minimum is 9 oz eq, it is important that the daily grain and meat/meat alternate minimums are more than 1 oz eq most days of the week.

Menu planning worksheets are very helpful tools for ensuring meal pattern requirements are met at both breakfast and lunch (particularly vegetable subgroup requirements). They can be found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage, under the Menu Planning Tools heading (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Portion sizes

Meat/meat alternate (M/MA) is credited by weight, not by fluid ounces. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving of ground/diced/shredded meat. Fluid ounces are a volume measure, while ounces are a weight measure. To ensure that students are receiving the adequate amount of meat/meat alternate, weigh the meat/meat alternate, then determine which scoop will hold that weight of meat.

Proper portion size utensils should be used. Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e. the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches children good eating habits by demonstrating and providing appropriate portion sizes of each food

group at a meal. Food costs are controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase.

Whole Grain-Rich Requirements

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain 100 percent whole grain or a blend of whole-grain meal and/or flour and enriched meal and/or flour of which at least 50 percent is whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited towards daily or weekly meal pattern requirements. 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 whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

Allowable Milk Types

The only allowable milk types in Child Nutrition Programs are nonfat (skim) unflavored milk, nonfat (skim) flavored milk (e.g., chocolate), and low-fat (1%) unflavored milk. Neither 1% flavored nor 2% flavored or unflavored milk can be served unless your SFA has applied and been approved for a milk exemption for school year 2017-2018. Discontinue serving 1% (low-fat) chocolate milk.

- Note: If the SFA can demonstrate a hardship as evidenced by a reduction in student milk consumption or an increase in school milk waste, an exemption may be requested for the service of low-fat, flavored milk. Review the August 23, 2017 memo, "[School Meal Flexibilities for School Year \(SY\) 2017-18](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf)" for more information on the exemption process (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf). Note that until an exemption approval has been received, only fat-free, flavored milk may be served.

Crediting

The applesauce cup served for breakfast on 11/20 was 4 oz *by weight*, crediting as 3/8 cup of fruit. The other fruit offering was a 6fl oz juice cup, so the daily minimum requirement was met. However, it is recommended that a 4.5 oz applesauce cup is used to provide ½ cup of fruit.

Muffins served for breakfast on the day of observation were made from a purchased dough. In order to credit this item, the baked muffin should be weighed and Exhibit A used to calculate the ounce equivalency. However, as this product was not whole grain-rich (WGR), it cannot be credited towards the daily or weekly grain requirement.

It is important for point of service staff to know how raw vegetable credit. Therefore, the quantity of each vegetable needed to credit as a specific volume must be determined. This can be done one of two ways. For example, to determine how many baby carrots equals ¼ cup, either:

1. Dice up the carrot sticks and determine the how many are needed to fill a ¼ cup spoodle.
2. Calculate the weight of ¼ cup of carrots using the Food Buying Guide and determine the average number needed to provide that weight using a scale.

Juice Limit

No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. This limit applies separately to breakfast and lunch. Juice offered must be 100%, undiluted juice. For example, ½ cup fruit pieces (fresh, frozen, or canned in juice or light syrup) may be offered alongside ½ cup 100% juice each day, which meets the 50 percent limit.

Recipes

Standardized recipes are required for all menu items that have more than one ingredient (ex. 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 food service 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. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made or when optional ingredients are included. Both a weight and measure should not be included for each ingredient as they can be slightly different and result in inconsistent crediting. Instead, record weight OR measure based on how the recipe is prepared. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Documentation

Production records are intended to be useful tools to record information prior to production, during production, and following production. The production record template from our website is being used. However, it is being completed after meal service and therefore is not being used to its full potential. Additionally, all items offered as part of the reimbursable meal must be documented. This includes alternate entrée options (Lion's meal).

Vegetables offered as part of the veggie tray/garden bar must be documented separately. This can either be done on the current production record, or usage can be recorded on a separate [garden bar record](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Pre-K students

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten who are participating in the National School Lunch Program and/or School Breakfast Program. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

Preschool students are allowed to be served the K-8 menu if they are served at the same time and in the same place as the other age/grade groups, under the **co-mingling flexibility** from the USDA. This flexibility may be used in situations in which it would be a challenge for staff to determine during meal service if a child is in preschool or K-5.

Training resources on family style meals may be found on SNT's [Infant and Preschool in NSLP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Additional resources are available on the Community Nutrition Team's [Nutrition and Wellness Training](https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice) webpage, under the Meal Service heading (<https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice>).

Findings and Corrective Action Needed

□ Finding #1: The alternate entrée option (peanut butter and jelly) is not being documented on the production record. Additionally, the sandwich only credits as 1 oz eq meat/meat alternate resulting in a weekly meat/meat alternate shortage.

Please note that repeat violations involving weekly quantity shortages on future Administrative Reviews may result in fiscal action.

Corrective Action Needed: Please submit two weeks of completed production records for lunch that document the Lion's meal as well as a statement describing what will be offered with the Lion's meal to ensure that the weekly minimum requirement for meat/meat alternate is met. The production records should also separate out the vegetables being offered onto individual lines, or a separate garden bar record should be provided.

□ Finding #2: Staff do not appear to understand OVS or what makes a reimbursable meal. At breakfast, students selected milk and juice from a cooler after leaving the line. This cooler was not monitored. 25 non-reimbursable meals were observed either due to the student not having three food items or not having at least ½ cup of fruit.

At lunch, students went through the unmonitored garden bar after leaving the line. As the garden bar was after the point of service, the items on it could not be counted towards the reimbursable meal. The only fruit or vegetable on the serving line was 3/8 cup of peas, so it was not possible for students to leave the line with a reimbursable meal. **All meals observed at lunch must be reclaimed.**

- If the items on the garden bar could have been counted, there still would have been 26 meals missing component/s and/or ½ cup fruit and/or vegetable.

Corrective Action Needed: Submit a training plan and signed roster showing that staff has received training on OVS. Training may include reviewing the [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) or [webcasts on OVS](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts).

Additionally, please submit a written statement and/or diagram showing how the breakfast and lunch lines will be rearranged so that all components of the reimbursable meal are selected prior to the point of service or explaining who will be monitoring at the milk cooler/garden bar to ensure that reimbursable meals are selected.

□ Finding #3: The following items served during the week of review or during the on-site observation were not whole grain-rich:

- Muffins
- Bread
- English muffin
- Buttermilk biscuit
- Scone
- Chicken noodle soup

No labels were provided for:

- Soft shell tortilla
- Yellow corn taco shell
- Hamburger bun
- Hot dog bun

Corrective Action Needed: Please submit labels for the whole grain-rich products that will be served in place of the enriched items listed above. For those items that documentation was not provided, if they are whole grain-rich, please submit label that includes an ingredient list and the weight of the product; if they are not whole grain-rich, please submit labels for whole grain-rich products that will be served in their place.

❑ Finding #4: A standardized recipe was not available for the peanut butter and jelly sandwich, and a standard measuring utensil was not used to prepare the sandwiches. This resulted in an inconsistent amount of peanut butter being used and therefore, sandwiches that did not all provide the desired 1 oz eq meat/meat alternate.

Standardized recipes were also not available for the beef sandwich served during the week of review or the chicken noodle soup prepared during the on-site review.

Corrective Action Needed: Please submit a standardized recipe for the peanut butter and indicate on the recipe the measuring utensil to be used.

Standardized recipes should be developed for the chicken noodle soup and beef sandwich the next time they are prepared. However, if these recipes will not be on the menu again, submit a written statement explaining that and describe what entrees will be served in their place the next time this menu week is served. Documentation to credit the substitute entrees (recipes, labels, CN labels/PFS) should also be submitted.

❑ Finding #5: A 6fl oz juice is offered daily as one of the fruit options at breakfast. This exceeds the 50% juice limit for the week. It is recommend that either juice is only offered 1-2 times per week or a 4fl oz juice cup is used.

Corrective Action Needed: Submit one week of production records showing that the 50% juice limit is being met. If planning to switch to a 4fl oz juice cup, please submit label/s for the new product.

❑ Finding #6: No vegetables from the bean/pea subgroup were served during the week of review. The review was expanded to the entire review period (month of October) and no vegetables from the bean/pea subgroup were served the entire month.

Please note that repeat violations involving missing vegetable subgroups on future Administrative Reviews may result in fiscal action.

Corrective Action Needed: Submit two weeks of lunch production records and menu planning worksheets showing that the bean/pea subgroup requirement was met.

❑ Finding #7: Low-fat flavored milk is an unallowable milk type, and is being offered at both breakfast and lunch.

Please note that repeat violations involving unallowable milk types on future Administrative Reviews may result in fiscal action.

Corrective Action Needed: Submit milk invoices showing that only allowable milk types are being purchased.

❑ Finding #8: The Crystal Lake frozen whole eggs used on 10/23 cannot be credited without a signed PFS from the manufacturer. If additional documentation cannot be obtained, use of this product should be discontinued.

Corrective Action Needed: Submit either a PFS showing how this product credits towards meal pattern requirements. Alternatively, a statement describing what will be served in place of this product (be specific and include serving size) along with any necessary documentation and/or recipes is acceptable.

❑ Finding #9: On the day of observation, the fruit at lunch (mixed fruit) was offered on the garden bar. As the garden bar was after the point of service, it could not be counted towards the reimbursable meal. However, the serving utensil used for the fruit was a 3 fl oz spoodle (3/8 cup), which is not sufficient to meet the daily minimum fruit requirement for K-8.

Please note that repeat violations involving insufficient daily fruit quantities on future Administrative Reviews may result in fiscal action.

Corrective Action Needed: Submit a statement describing how fruit will be offered at lunch to ensure the daily minimum requirement is being met (such as using a 4 fl oz spoodle to provide a planned ½ cup serving or offering addition fruit choices). Production records submitted will also be reviewed to check for compliance with the daily minimum fruit requirement.

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 also be subject to fiscal action. Thank you.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ Finding: The finding was that the annual financial report did not break out the non-program foods, which included juice and milk.

Corrective Action Needed: Please correct the annual financial report before December 31. Please provide a statement regarding breaking out items into non-program foods category for expenses and revenues.

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

Paid Lunch Equity Tool was completed in submitted on this current school contract.

Non-program foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and 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 our website: (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs which include 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. Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

$$\frac{\textit{Nonprogram food revenue}}{\textit{Total program and nonprogram revenue}} \geq \frac{\textit{Total nonprogram food costs}}{\textit{Total program and nonprogram food costs}}$$

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).

Findings and Corrective Action Needed: Revenue From Non-program Foods

❑ **Finding:** The finding was that the non-program foods revenue tool was not completed.

Corrective Action Needed: Review the [Non-program Foods Revenue Tool webinar](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html). Please submit a copy of the tool by using the annual financial report or using a 5-day reference period. Please remember the tool needs to be run once a year when selling non- program items such as juice.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Public Release

As required at 7 CFR 245.5(a) near the beginning of each school year the public must be notified that free and reduced priced meals and free milk are available. This notice must include the eligibility criteria free and reduced price meals or free milk. The public notice must be provided to the local news media, the unemployment office, and any major employers contemplating large layoffs in the attendance area of the school or grassroots organizations.

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 October 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, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

Special Diets

- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner 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>).
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide the nutrition information from the product you will be using. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Findings and Corrective Action Needed: Civil Rights

❑ **Finding:** The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal prices for student meals are visible on the computer screen that can be seen by students, which constitutes overt identification. This was noticed when students typed in their name but not evident when the student scanned their card.

Corrective Action Needed: Please correct the problem and submit a statement of how this will be corrected.

❑ Finding: The finding was that the correct non-discrimination statement was not listed on the printed menu.

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

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule required School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

Content of the Wellness Policy

At a minimum the wellness policy must include:

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy.

For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). LWPs should include specific goals related to:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)

- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate.

St. Jerome’s LWP indicates that the “school will actively inform families and the public” through the school website and the newsletter about the content of and updates to the policy. The policy also indicates that the parents will be invited to participate in school-sponsored activities throughout the year. There was no indication of informing parents and the public on how to participate in the handbook or website.

SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit).

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of your SFA’s policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place.

To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team’s Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources).

Public School Districts that participated in the Wisconsin Obesity Prevention’s Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your schools report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (https://www.wihealthatlas.org/lwp/). Schools are encouraged

to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include a plan to improve upon the results of the assessment.

Findings and Corrective Action Needed: Local Wellness Policy

❑ **Finding:** Your SFAs Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Needed: Language must be added related to the following content areas: The local wellness policy language must be updated to allow community members, parents and students to participate in the policy. Additionally, the language regarding foods and beverages sold outside of school meals must also be updated to current language. Reference to "competitive foods" and "foods of minimal nutritional value" is no longer valid. Please submit a statement of a timeline for updating your policy to become compliant with the final rule. The [Local Wellness Policy Checklist](#) can assist with sample language.

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption.

An entree is exempt from Smart Snacks standards on the day it is served and the following day. This exemption applies only to the planned entrée and does not extend to other side items. Additionally, items may not be bundled and sold for a unit price as this negates the exemption and the bundle would then be required to meet Smart Snacks standards.

Professional Standards

Nice job of tracking food service staff training hours.

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

- **Annual Training Requirements for All Staff**

Directors: 12 hours

Managers: 10 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

If hired January 1 or later, only half of the training hours are required during the first school year of employment. **Technical assistance** was provided regarding tracking non-food service staff training hours.

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

The school provides a water fountain located in a convenient location where meals are served.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). While you're at it, visit the [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

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.
- 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 food service staff. 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>)
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that 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.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. [Sample written procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) and [Buy American monitoring procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america) are available online (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america).

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) 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.

More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed: Food Safety and Buy American

❑ Finding: The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin or not domestic:

No country of origin: pasta, bbq sauce, miracle whip, butter buds, ranch seasoning, frozen blueberries, Hot dogs, Turkey roast

Not Domestic: Cinnamon rolls-Canada, Olive oil-imported, Canned pineapple-Thailand, Frozen Broccoli-Mexico

Corrective Action Needed: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. 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).

❑ Finding: The finding was that food temperatures were not documented for food items being served.

Corrective Action Needed: Please submit a log of recorded food temperatures for one week.

❑ **Finding:** The finding was that there were non-food service staff with duties that assist the food service program. Some non-food service staff help with point of service for milk break and meals.

Corrective Action Needed: Please review the requirements for tracking staff involved in the food service program. Please send me a copy of non-food service staff with the required elements in a tracking tool along with any training hours they have had.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

Reports and program records must be maintained for a period of three years after the submission of the final claim for reimbursement for the fiscal year.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

SFSP Outreach

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>). **Technical assistance** was provided to reach out to families of any sites available in the area.

School Breakfast Program

At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year. **Technical assistance** was provided.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

Wisconsin School Day Milk Program requires the distribution of free milk to free and reduced priced students in K-5. The Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk. Per the Agreement, the SFA agrees to serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid. **Technical assistance** was provided.

Findings and Corrective Action Needed: WSDMP

❑ **Finding:** The finding was that there was claiming for juice that should not have been claimed as there was no supporting documentation to support any juice for students with special dietary needs.

Corrective Action Needed: Submit 30 operating days of corrected data and once this is received then SA will review it. Once reviewed the SA will work with the school to revise the unpaid claim.

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>).

