

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

School Food Authority: St. Stephens Evan. Luth.

Agency Code: 147899

School(s) Reviewed: St. Stephens

Review Date(s): 3/13, 3/14, 2018

Date of Exit Conference: 3/14/2018

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. Stephens for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding: The finding is the Benefit Issuance for one family was a letter from another school on their letterhead stating the students were reduced by way of application at that school. Since the transfer to St. Stephens, the students remained on reduced status. The SFA is new and was not aware that a copy of the application needed to accompany the letter.

Corrective Action Needed: Call the previous school and request a copy of the application for this particular family to attach to the letter showing the Reduced status. If they are not willing to share that information, please document this phone call and date on the letter. Keep for your files. Submit a statement to show this was done.

Verification

Findings and Corrective Action Needed: Verification

Finding: The finding is the application that was selected for Verification Process did not have the Verifying Official or Confirming Official's signature on the back.

Corrective Action Needed: It was discussed with the SFA, and recommended to watch the Verification Process Webcast on the DPI website. Please submit a statement saying you watched the webcast and understand the process completely. The signatures for the app were corrected on site.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all staff at St. Stephen's Evangelical Lutheran School for the warm welcome on this Administrative Review (AR). Thank you to the Food Service Director for sending documentation ahead of time in an orderly fashion as this greatly expedited the AR. The director has come to SNSDC classes in the past and is eager to learn the meal pattern and meet regulations. Staff are respectful and friendly to students, making a great dining experience for all. Great job serving healthy, nutritious meals to the students of St. Stephen's!

Technical Assistance

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 and reduced meal applications, meal pattern, and record keeping requirements. Travel and 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).

Crediting

A few menu items were credited incorrectly on production records. Please note there is a difference between serving size and crediting (or meal pattern contribution). Fruits and vegetables credit by volume served (e.g. ½ cup peaches credit as ½ cup fruit) and meat/meat alternate and grains credit by weight (ounce equivalents (oz. eq.)). Refer to the [Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (FBG) for more details on how specific ingredients credit toward the meal pattern (https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs). Processed products which cannot be credited using the FBG require additional documentation like a Child Nutrition (CN) label or Product Formulation Statement (PFS). These typically will not credit ounce for ounce, meaning one ounce by weight will not credit as 1 oz. eq. M/MA. These will have the crediting directly on them (e.g. a chicken patty may be 2.5 ounces by weight, but will credit 2 oz. eq. M/MA). When recording on production records, pay careful attention to the serving sizes versus the crediting of the menu item.

Crediting Documentation

As a reminder, a Child Nutrition (CN) label or Product Formulation Statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the USDA *Food Buying Guide* for School Meal Programs. Make sure these are kept on file for all applicable products (e.g. CN Label, PFS, or USDA Fact Sheet for Deli Turkey).

Exhibit A

[Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf) is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1 oz. eq. for each specific group (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf). Exhibit A groups all grains products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:

- Group A: these products are hard and crunchy and dry and lightweight. Per ounce, they contain a good deal of grain.
- Group B: whether serving bagels, pizza crusts or tortillas, 1 ounce of these products all credit the same towards the meal pattern (1 ounce = 1 oz. eq. grain).
- Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1 ounce of pancake does not credit as 1 oz. eq. like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz. eq. grain.

Exhibit A can be used to credit any of the products that appear in this table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g., peanut butter with whole grain bread). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. It produces a consistent

quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized to reflect the products and practices that are used in the kitchen. 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>).

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. Continue to work with all staff members to record planned usage, actual usage, and leftovers for any food offered as part of a reimbursable meal.

While there is no required production record template, there are some examples, including multiple age/grade groups that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements (“Must Haves and Nice to Haves” list) can also be found at that link.

Multiple Entree Options, Meeting Daily and Weekly Requirements

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line (or entree) needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. This includes the alternate daily option as well as the main line.

Signage - ½ cup fruit and/or vegetable requirement

Great job with current handwritten signage and magnetic food components showing the daily menu. Although the requirement to select a fruit or vegetable for a reimbursable meal was written, make sure the ½ cup requirement is specified. The signage should communicate some version of the following, “students must select at least ½ cup fruit, vegetable, or combination.”

Whole Grain-Rich

Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning 50% or more of the product needs to be whole grain. When determining if an item is whole grain-rich, the first word in the ingredient list needs to say *whole* or have a whole grain listed first (only exception is “water” labeled first).

Corrective Action

Finding #1: Production records are not being filled in completely on a daily basis.

Corrective Action Needed: Please send one week of completed production records with all required information (e.g. planned number of servings). Refer to the [production records webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) for templates and a list of the “must haves” (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Finding #2: There was a weekly grain shortage for the week of review with the daily alternate option menu option. Each day, 1 slice of bread (1 oz. eq. grain) is offered with the alternate. Although this meets the daily grain requirements, this will not meet the weekly requirements (5 oz. eq. offered during the week of review; 8 oz. eq. grain required weekly for K-8 students).

Corrective Action Needed: Please state what you will do to the week of review so that 8 oz. eq. grain is offered to students.

Finding #3: There was a daily vegetable shortage on 2/20/18 during the week of review ($\frac{1}{2}$ cup romaine, which credits as $\frac{1}{4}$ cup (green, leafy veggies credit as half their volume), plus $\frac{1}{4}$ cup baby carrots, equals $\frac{1}{2}$ cup vegetables served for the day). A full $\frac{3}{4}$ cup vegetable is required daily for grades K-8.

Corrective Action Needed: Please state what you will do to 2/20/18 so that a full $\frac{3}{4}$ cup vegetable is offered to students. Review 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).

Finding #4: The Rich's Hoagie was not whole grain-rich as the first ingredient had *enriched* listed.

Corrective Action Needed: Find a whole grain-rich product to replace Rich's Hoagie and submit a nutrition facts label and ingredient list.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

- How to locate the agency's Child Nutrition program Report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, was reviewed with the SFA. We also reviewed how to access the Aids Register, to track all program deposits made to the agency's account. The Aids Register also shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

Annual Financial Report (AFR):

- 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).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- 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.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance".
- 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” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
- Under “Ala Carte”, you should be reporting 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, you want to 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.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf): <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist

Findings and Corrective Action Needed: Nonprofit School Food Service Account

Technical Assistance was provided regarding the Annual Financial Report. The SFA is new and is planning on taking a summer DPI class for Financial Management.

Finding: It was found that there isn’t any Unpaid Charge Policy on site.

Corrective Action Needed: Submit a copy of an Unpaid Meal Policy after you have devised one for your district. Also it needs to be distributed to all families via website, handbook or both.

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

Technical Assistance was provided regarding the PLE tool. The current tool was completed by the previous director for the 2017-18 school year. The SFA is new and has not done the tool yet. It was recommended to go on the DPI website and learn how to do the tool for the next school year.

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

There were no indirect costs found.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Civil Rights was done at the beginning of the 2017-2018 school year for all staff, and is documented and kept on file.

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

On-Site Monitoring is being done correctly.

Local Wellness Policy

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 requires 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 general 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

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)

- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team Nutrition has several [wellness policy resources](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>).

Findings and Corrective Action Needed: Local Wellness Policy

❑ Finding: St. Stephens has a Wellness Policy in place. However, it does not include specific bullet points as outlined in the Wellness Policy Checklist that are a requirement.

Corrective Action Needed: Follow the Wellness Policy Checklist to update your policy and change/add some language and specifics to comply with the USDA Wellness Policy requirements. We went over the list and discussed. Also, it is required to hold a meeting at least annually, keep a roster of attendees, and meeting minutes.

Keep these documents for your records. Submit a copy of a revised Wellness Policy with the corrections, and a statement stating your district will hold an annual meeting, to update, discuss, and keep implementing this policy.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management,

record keeping, customer service, nutrition education, and general day-to-day program management.

- The [hiring standards for SFA directors](#) are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

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, 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](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Commendations/Comments/Technical Assistance/Compliance Reminders

- **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.

Findings and Corrective Action: Professional Standards

Finding: Staff have not completed the required training hours for the current school year and was unable to provide a training plan for the current school year.

Corrective Action Needed: Provide a training plan for meeting the required training hours for the head cook, and the assistant cook, and staff person who operates the computer during foodservice.

Finding: Training is not being monitored on a tracking tool.

Corrective Action Needed: Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action. This was done and corrected on site. A copy was provided for the training hours of the Food Service Director.

Water

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Commendations/Comments/Technical Assistance/Compliance Reminders
Water is available to all students inside the cafeteria via water fountain.

Food Safety and Buy American

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, farmers, and provides healthy choices for children in the USDA 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 the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification.

There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product
 - e. Distribution- record the reason the distributor carries the non-domestic product
 - f. Other- explain

You may record additional information if you find it beneficial.

A suggested template is found on the [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage under Buy American Noncompliant Product list (word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>). More information on this new requirement, including a tool to assist with tracking noncompliant 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>).

❑ Finding: The following product was identified in the SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List, or SFA equivalent form:

- Canned, Mandarin Oranges (China)

Corrective Action Needed: Submit a non-compliant product form for the Canned, Mandarin Oranges. A [Template Form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) from DPI's Procurement webpage may be used (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Commendations/Comments/Technical Assistance/Compliance Reminders

St. Stephens had the current “And Justice For All poster and the Food Safety Inspection Reports posted in a public place for anyone to view. Great job!

[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.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- 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.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Food Employee Reporting Agreements

- All food handlers must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).

- All food handlers must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. (record any notable observations)

❑ Finding: The finding was that the thermometers are not being calibrated on a regular basis or at all.

Corrective Action Needed: Please submit a statement stating that the SFA will instruct her staff to calibrate stick thermometers at least every two weeks as stated in the guidance per DPI, and track that on a Log Sheet.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

SFA is currently keeping all Nutrition Program Documents for 3 years plus the current year.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at St. Stephens USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months.

SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

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

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
Phone: 608.266.7124
e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action: SBP and SFSP Outreach

❑ **Finding #1: There currently is no outreach taking place.**

Corrective Action Needed: Include on your school website, the current information for summer outreach for meals, as listed above. Submit a statement that this is being done.

Thank you to all the staff at St. Stephens for their cooperation and courtesy extended during our visit.

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).



With School Nutrition Programs!