

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

School Food Authority: St. Mary Springs Academy

Agency Code: 207698

School(s) Reviewed: Review Date(s): March 4, 5, 2019

Date of Exit Conference: March 5, 2019

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. Mary Springs Academy 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

18 Applications were reviewed, and no errors were found.

Comments/Technical Assistance/Compliance Reminders

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate

representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for the application to be considered complete.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ **Finding #1:** Upon reviewing the sample pool of applications, it was found that some of the applications had missing information or unclear information. Applications had missing Household box numbers, or the numbers were incorrect and did not match to the amount of names listed.

Corrective Action Needed #1: Technical Assistance was given regarding applications and if they are partially completed, and found on Direct Cert. Also, there were a couple applications found to be incomplete, but all of the information was on the Skyward system. We looked at that to be sure the determinations were correct. There was discussion with the director, and going forward, it was encouraged to provide a clear note with date and initials on the app.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

Verification was done correctly, and the VCR report submitted on time.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

In observing the lunch program, and the Point of Service, there are no errors. There was no overt identification found. The students use either a pin number or finger scan, and then are charged.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

Thank you to the staff of St. Mary's Springs Academy for their time and cooperation during the Administrative Review. Thank you to the Food Service Director for providing documentation prior to the on-site review and answering all related questions. The school nutrition professionals work well together and with the students. The students are offered a great variety of fresh fruits and vegetables on the garden bar and in the vegetable boats. Thank you for your hard work and dedication to your National School Lunch Program!

Technical Assistance:

Condiments

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Condiment usage is somewhat controlled by offering packaged condiments to students. Other condiments are in squeeze bottles, pumps, or can be selected using tongs. Some strategies to promote appropriate serving sizes include adding signage at the condiment station with a photo of what one tablespoon of ranch dressing or ketchup looks like, adding signage to the bins of pre-packaged condiments indicating how many packets make up a portion size, or purchasing single-use, one ounce cups to aid in portion control with pumps and squeeze bottles.

Garden Bar Signage

St. Mary's Springs Academy offers a colorful, fresh garden bar to 4-12 students daily. However, students do not know what the planned portion size is for certain items on the garden bar due to portioning utensils not being used. Tongs are used for almost all items on the garden bar for easier self-service. If a portioning utensil cannot be used to serve certain garden bar items, signage indicating the planned portion size can be helpful and an educational opportunity for students. Signage can also help point of service staff know how much or how many piece of a fruit or vegetable makes up the ½ cup fruit, vegetable, or combination requirement.

Consider adding signage with pictures of what the planned portion size of fruits and vegetables looks like. Examples of more signage and printable signage can be found on DPI SNT's [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage under the Salad Bar Signage heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

School Breakfast Program

Consider participating in the School Breakfast Program (SBP). Participation in SBP will enable St. Mary's Springs Academy to help students start their school day with good nutrition and provide reimbursement to you for doing so. More information is available on the [School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program) webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>).

Findings and Corrective Action Needed for Meal Pattern and Nutritional Quality:

❑ **Finding #1:** Lunch production records did not have the following information filled in or the following categories were missing based on the [Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) ("Must Haves and Nice to Haves") (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>):

- Menu type (lunch, breakfast, afterschool snack)

- Planned serving size for all fruits, vegetables, and condiments on the 4-5 and 6-12 garden bar. Fruit sizes (e.g. case count) should also be recorded.
- Actual number of servings prepared
- Planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb case, 2-96 count case)
- Amount leftover for all items on production record (this can be in number of servings or purchase units)
- Milk usage by each type (or a [milk recipe](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/milk-recipe-instructions.pdf) can be used and total milk usage can be recorded) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/milk-recipe-instructions.pdf>)
- Planned serving size and usage for condiments and any extra menu items
- Substitutions made for students with special dietary needs

The school nutrition professionals also indicated that an Uncrustable, string cheese or yogurt, and 1.00 ounce equivalent grain item, such as savory crackers or snack mix, are offered as a daily alternate entrée option. The alternate entrée option is not listed on production records. It is required that all foods offered as part of the reimbursable meal are recorded on production records.

While there is no required production record template, there are some examples that may be used on the DPI SNT [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). On this webpage, there are also garden bar and salad bar production record templates.

[Production Record Instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) is an excellent resource and training tool for assistance with understanding the production record requirements and what each category requires (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).

Corrective Action Needed: Submit one week of completed lunch and garden bar production records after a service week with all of the Must Haves listed and filled in.

❑ **Finding #2:** Standardized recipes are required for all menu items that have more than one ingredient. Standardized recipes were not available for the salad entrée or vegetable boats offered during the week of review.

Additionally, standardized recipes should be updated to reflect current practices and products. Standardized recipes exist, but it was determined that the ham and swiss sandwich and the garden bar recipe and garden bar sub-recipes do not reflect what is actually being prepared. While onsite, an updated recipe was provided for the ham and swiss sandwich. It was discussed that the garden bar recipe and garden bar sub-recipes are not needed if using a vegetable boat standardized recipe and recording all garden bar offerings on the garden bar production record.

Corrective Action Needed: Submit standardized recipes for the entrée salad and vegetable boats.

❑ **Finding #3:** During the on-site review, five non-reimbursable meals were observed. Four non-reimbursable meals were observed due to students not selecting ½ cup of fruit, vegetable, or combination. The first meal was a sunbutter sandwich, graham crackers, and milk. The second meal was a hamburger, graham crackers, and four baby carrots (< ½ cup). The third and fourth meals were related to the crediting of vegetable on the ham and cheese sandwich. The ham and cheese sandwich recipe indicates that it credits as ½ cup vegetable. However, there is one slice of tomato and one piece of romaine lettuce, crediting as less than ½ cup vegetable. One student selected just the sandwich and another student selected the sandwich, graham crackers, and milk. One non-reimbursable meal was

observed due to a student not selecting three full components. For the fifth non-reimbursable meal, the student selected mashed potatoes, broccoli, and two dinner rolls.

Corrective Action Needed: Submit a statement explaining how these errors will be corrected and avoided in the future.

Fiscal action will be assessed for these five non-reimbursable meals.

2. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

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
 - Sample outstanding balance letter
 - Sample robo-call script

Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

Thank you for completing the Paid Lunch Equity **Survey**. The PLE tool was not required due to a positive balance in the school food service account Fund 50.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

The Non-Program Food Tool was completed. Nice job!

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

No indirect costs were found.

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they

pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.

- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.

3. GENERAL PROGRAM COMPLIANCE

Civil Rights

Civil Rights training is being done annually and an attendance roster kept.

The Justice for All poster and inspection reports were posted out in the cafeteria where public can view.

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) 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.

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered.

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.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- 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>).
- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow's milk and pre-approved through DPI. Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP, which allows juice as a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.

All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the

information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complain Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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](#) 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](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

The St. Mary Springs Wellness Policy was updated in January of 2019. The policy lacked a name of a leader during the last AR review. They have since corrected that issue, and the policy lists a leader. Thank-you for updating your policy and including all necessary components.

Technical Assistance, if do have a policy: 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.

Smart Snacks

Commendations:

The Food Service Director does an excellent and thorough job of tracking Smart Snacks. Documentation is kept in a binder that includes a list of all foods and beverages sold in the cafeteria throughout the school year and each food and beverage label with the corresponding Smart Snacks Calculator printout. The Marketing Team is in charge of tracking fundraisers and has a detailed tracking tool. All exempt fundraisers followed the Wisconsin fundraiser guidelines. Keep up the great work!

Findings and Corrective Action Needed for Smart Snacks:

❑ Finding #1: There is a vending machine in the meal service area that is available to K-12 students during the school day. If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. The vending machine contains 8.4 fluid ounce Izze juices. Under Smart Snacks, juices greater than 8 fluid ounces are not allowable for elementary students.

Corrective Action Needed: Submit a statement detailing St. Mary's Springs Academy's action plan and timeline for bringing this vending machine into compliance with the Smart Snacks regulations.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

St. Mary Springs is currently up to date on training and documenting all employees on a tracker form. It was provided to us during the AR review.

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](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.

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

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.

Water is available to all students during all meal times at no charge.

Food Safety

Commendations/Comments/Technical Assistance/Compliance Reminders

The Food Safety Book was available out in the kitchen for all employees to use. It contained all required components and was very neatly maintained. 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.

Buy American

Compliance Reminders:

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.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation. SFAs must monitor contractor performance, to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Technical Assistance:

Buy American Non-Compliant Product Forms

St. Mary's Springs Academy uses Non-Compliant Product forms to keep track of almost all non-domestic products. Excellent work! However, the forms are not fully filled out. The country of origin is required to be filled in on each form. In addition, if the reasoning section has a blank line, such as the reasoning for seasonality, more information that is requested must be provided.

Non-Compliant Products Found Onsite

The following products identified in St. Mary's Springs Academy's storage did not have proper labeling to identify the country of origin:

- Granola- distributed
- Garlic mist seasoning spray- made in
- Mayonnaise- NJ
- Barbeque sauce- distributed
- Seasoned salt- distributed
- Canned pinto beans- distributed
- Wild Mike's pizza- manufactured
- Butter and margarine blend- CA
- Yogurt- distributed

In USDA Memo SP 38 -2017, any product that does not identify the country of origin requires certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products.

Achieving Buy American Compliance

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S."

and contains over 51 percent of its agricultural food component, by weight or volume, from the U.S.” This can be accepted in an email.

- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (https://dpi.wi.gov/school-nutrition/procurement/procurement-manual). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed for Buy American:

❑ **Finding #1:** The following products were identified in St. Mary’s Springs Academy storage area as non-domestic:

- Frozen cauliflower- Mexico
- Pineapple- Costa Rica
- Cherry tomatoes- Mexico
- Cucumber- Mexico

St. Mary’s Springs Academy does not have Buy American – Non-compliant Lists or SFA equivalent form for these products.

Corrective Action Needed: Provide a copy of the completed forms for the non-compliant products listed. The [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx) is located on the Buy American Provision webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx).

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

All records and documentation are being kept for 3 yrs plus the current year.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

St. Mary Springs Academy currently has the summer outreach information on its website. Also, they provide it in a newsletter that goes home to families at schools end.

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. Mary Springs Academy, 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

4. OTHER FEDERAL PROGRAMS REVIEW

Special Milk Program (SMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

Director is using the new tracker form from DPI website for POS of Special Milk. The aides come to kitchen to pick up the milk, and the teacher checks off as the aide gives the kids their milk. Process is clean and nice. Records are kept per requirement.

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (https://dpi.wi.gov/statesupt/every-child-graduate).”

