

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

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**School Food Authority:** St. Clement School

**Review Date(s):** February 26-27, 2019

**Agency Code:** 227422

**Date of Exit Conference:** February 27, 2019

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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 a nominal charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, 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, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- Wisconsin Team Nutrition is hosting a *Teaming Up to Increase Participation* workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop) webpage (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at St. Clement School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. 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. The school nutrition staff are doing a great job running the National School Lunch Program and Special Milk Program. All staff were receptive to recommendations and guidance. The DPI review team is confident that St. Clement School will continue to improve their knowledge and operation of school meals programs.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Commendations:

- ✓ No Benefit Issuance (BI) errors occurred. Great job!
- ✓ Application was approved correctly.
- ✓ Meal benefits were accurately transferred from Direct Certification (DC) runs to BI list.

##### Technical Assistance:

###### *Benefit Issuance*

- A BI list is a list of students receiving meal benefits *only*. Do not include “paid” students. This list must have the student’s name, benefit approval date, how the student qualified (DC, application, etc.), and the student’s status (free or reduced).

###### *Approving Applications*

- Income on applications should only be annualized if the incomes listed are at different frequencies (monthly, weekly, etc.). If multiple incomes are listed with the same frequencies, the income are simply totaled and recorded on the back of the application; they are not to be annualized.
- The following information **must** be on an application, otherwise it cannot be approved: household number, last four digits of social security number, and household signature. If these items are not on the application, the SFA must follow up with the household prior to approving the application. The approval date then listed on the BI list would be the day all of the necessary information was obtained from the household.

###### *Direct Certification*

- The approval dates listed on BI lists must be the day of approval, not the first day of school. For example, the SFA had reported August 28 (first day of school) as the approval date for students found on the August 16 DC run.
- **DC must be run a minimum of three times per school year:**
  - Initial run prior to the beginning of the school year
  - Three months after initial run
  - Six months after initial run
- A verbal notice of approved benefits is allowable, so long as it is completed in a confidential manner. **The denial of benefits must be completed in writing.**

##### Resources:

- [Process Applications and DC webcast](https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story\_html5.html)

## Verification

### Technical Assistance:

- The confirmation review (Confirming Official) must be done by an individual other than the individual who made the initial eligibility determination (Determining Official).

#### Findings and Corrective Action Needed: Verification

**Finding #1:** The VCR was submitted showing that zero applications were verified. However, there was an eligible application on file that needs to go through the Verification process.

**Corrective Action Needed:** Please verify the application on file at the SFA and submit the documentation and results to the consultant assigned to your review. Additionally, please resubmit your VCR results to the consultant by handwriting the changes on the existing VCR. (Given that the VCR must be completed by February 1, alterations to the report are difficult to do at this point in time.)

### Resources:

- [Eligibility Manual for School Meals](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#em) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#em)
- [Verification Forms Packet](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification)

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## Meal Counting and Claiming

### Commendations:

- ✓ Meal counts are taken appropriately.
- ✓ Month of review meal counts are comparable to the claim for reimbursement.
- ✓ Day of review meal counts are comparable to the month of review meal counts.
- ✓ Daily meal counts are reviewed prior to monthly claims are submitted.
- ✓ All meals observed were reimbursable. Great work!

### Technical Assistance:

- **All students and adults meals and milks are to be counted as they are taken at the point of service (POS), not before or after.**
- Edit checks are to be completed monthly prior to submitting on-line claims for reimbursement. Edit checks serve as a double-check of daily counts as it compared these counts to the total approved and expected number of students (per free/reduced/paid lunch price category) each day of meal service.
  - Regarding the edit checks for St. Clement School, an “actual full lunch count” sheet is used to record daily totals. If meals are recorded by category and if the attendance factor equations are added to the end of this sheet, this may be used as an edit check form. Another option would be to utilize [DPI’s edit check](#) form in place of the “actual full

lunch count” sheet (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc>).

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ **Finding #2:** In the 18-19 school year, St. Clement School’s POS changed from manual to electronic. With this change, monthly edit checks have not included daily totals, only the monthly count total. Instead, daily totals are referenced from the electronic report, therefore, only a portion of the edit check forms are completed.

**Corrective Action Needed:** Submit an explanation of how edit checks will be completed going forward and submit the edit check for February 2019 prior to submitting the online claim.

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## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to the Food Service Director, school nutrition professionals, and staff at St. Clement School. We appreciate your time and efforts spent preparing for and participating in the onsite review. It is great that many menu items are prepared using scratch or speed scratch cooking, including the fresh bread. Putting the fruits and vegetables first in the serving line is a smart way to increase student consumption. Thank you for all that you do for the students of St. Clement School!

### Comments/Technical Assistance/Compliance Reminders

#### Standardized Weights or Measures for Reimbursable Meals

- All foods offered must be weighed or measured to ensure students are being offered reimbursable meals. For example, the homemade bread slices should be weighed periodically to ensure each slice offered is the intended weight.
- Servings sizes and crediting for fruits and vegetables that do not fit neatly into measuring utensils may be determined using the [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) or by performing an in-house yield study (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). The specific and verifiable procedures, which must be followed, are available on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).
- Sliced carrots are offered daily at lunch. The production records show a planned serving size of four, but no corresponding volume. The process for the in-house yield was shown onsite to determine the volume. The four carrot sticks were diced and placed into a measuring utensil to determine the volume. This should be repeated using the in-house yield procedures to obtain the average volume.
- If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as ½ of the volume served.

- Additional signage on a salad or garden bar can assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) with pictures that can be posted on a salad or garden bar (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

#### Production Records

- Consider adding more specific information for menu items, such as the brand, product number, or recipe number.
- It is helpful to document crediting on the daily production records. However, the crediting being filled in under each component is not done correctly. Currently, a “1” is being recorded under the respective components. Instead, the actual creditable amount should be recorded to accurately show how the menu items credit toward the meal pattern. For example, instead of marking a “1” in the R/O vegetable column for the sweet potatoes, a “½ cup” would indicate the actual creditable amount of red/orange vegetable offered.

#### Lasagna Crediting

- The crediting on the lasagna with ground beef recipe is incorrect.
- 103 oz of raw ground beef yields 76.22 oz after cooking. When divided by 125 portions, each portion includes 0.609 oz of cooked ground beef. The 160 oz of cheese divided by 125 portions provides 1.28 oz of cheese per portion. When added together and rounded down the nearest quarter ounce equivalent (oz eq), the beef and cheese together provide 1.75 oz eq M/MA.
- The marinara sauce provides ⅛ cup red/orange vegetable per serving.

#### Specifics on Recipes

- It may be helpful to update the standardized recipes to include information that is more specific. For example, the raw ground beef should include the percent fat, as this affects the yield and crediting. The recipe for the hot dog wraps could include the brand of turkey franks since crediting may vary by brand.

#### Crediting in a Nutshell

- The [Crediting in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf) handout provides a concise overview of the crediting basics (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf>).

#### Monthly Menu

- The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal. The daily alternate entree option should also be included on the monthly menu, either by listing it daily or including a statement that it is offered daily.

#### Wisconsin Team Nutrition Workshop

- The school nutrition director is encouraged to attend Wisconsin Team Nutrition’s Teaming Up to Increase Participation workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for

moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop) webpage (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

### **Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality**

- ❑ **Meal Pattern Finding 3:** There was a daily grain shortage at lunch on Tuesday during the week of review. Based on the total bread dough amount used in the hot dog wrap recipe, each hot dog wrap credits as 0.75 oz eq. All K-8 students must be offered at least 1 oz eq grain per day at lunch.

**Corrective Action Needed:** Submit a written statement specifically explaining what will be done to this menu day to offer students at least 1 oz eq grain. If the hot dog wrap recipe is modified, submit an updated recipe. If another grain item is added to the menu this day, submit all applicable recipes, crediting documentation, nutrition facts labels, and ingredient lists.

- ❑ **Meal Pattern Finding 4:** A cheese sandwich is offered as a daily alternate entree option for students who do not wish to take the planned entree. This sandwich is made using two 0.5 oz cheese slices, crediting as 1 oz eq M/MA. Since a student would have the option to choose this alternate entree choice each day of the week, this would result in a weekly M/MA shortage. K-8 students must be offered at least 9 oz eq M/MA per week, regardless of which entree option they choose.

Additionally, this sandwich must be recorded on the production record each day it is available and a standardized recipe is required. Please see Meal Pattern findings 6 and 7.

**Corrective Action Needed:** Submit a statement explaining how this weekly M/MA shortage will be fixed during the week of review. Potential options include adjusting the recipe or offering another M/MA item along with the sandwich. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.

*Repeat violations of quantity shortages during subsequent Administrative Reviews may result in fiscal action.*

- ❑ **Meal Pattern Finding 5:** 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. The lasagna noodles offered during the week of review were not whole grain-rich.

**Corrective Action Needed:** Find a new, whole grain-rich version of this product and submit nutrition facts labels, ingredient lists and recipes, as applicable.

- ❑ **Meal Pattern Finding 6:** Production records are intended to be useful tools to record information prior to production, during production, and following production. The production records submitted for the week of review were incompletely filled in or were missing information.
  - Either the number of servings prepared or quantity (in purchase units) prepared is being recorded. Both the number of servings and quantity prepared must be recorded for all menu items. Consider splitting your “amount prepared” column, adding a column to the current production record template, or using a new template.
  - The lettuce and carrots offered daily need both the number of servings prepared and the quantity (in purchase units) prepared.

- Leftovers must be recorded for all menu items. This information was inconsistently filled in during the week of review.
- Production records must record actual milk usage by type. The amount of milk is being recorded at the beginning of service, but the leftover amount must also be recorded to show usage.
- The alternate cheese sandwich entree option must be recorded on the production record when it is offered.

A list of production record requirements (“[Must Haves and Nice to Haves](#)”) and sample production record templates can be found on our [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).

**Corrective Action Needed:** Submit one week of completed production records, showing the above corrections. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.

- ❑ **Meal Pattern Finding 7:** Standardized recipes are required for all menu items that have more than one ingredient. There was no standardized recipe for the garlic toast or cheese sandwich offered during the week of review. Additionally, the pizza crust recipe should be updated to reflect that half the total flour is whole wheat and the other half is enriched.

**Corrective Action Needed:** Submit a standardized recipe for the garlic toast, cheese sandwich, and pizza crust. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the [Standardized Recipes webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

## 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. The school day is considered the period from the midnight before to 30 minutes after the end of the instructional school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption.
- There are two situations by which an organization may sell foods and beverages to students during the school day.
  1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
    - a. These foods or beverages may be sold at any time and in any location.
    - b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
  2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards:
    - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
    - b. Exempt fundraisers cannot occur in the meal service area during meal times.

c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times.
- Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.
- The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

## Buy American

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

- The USDA requires that an 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 as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
  - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
  - If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
  - The label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the 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.
  - 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 the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be 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 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 and Buy American monitoring procedures can be found in the [Contract Management](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
- 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.
- For domestic products without country of origin labeling (COOL), consider the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- More information on this new requirement 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: Buy American**

- **Buy American Finding 8:** The following products were identified in the SFA's storage area as non-domestic and not documented:
  - Canned Pineapple (Indonesia)
  - Canned Black Olives (Morocco)
  - Garlic Powder (China)

**Corrective Action Needed:** Complete and submit a Non-Compliant Product Form for the products listed above.

### 3. RESOURCE MANAGEMENT

#### Non-profit School Food Service Account

**Commendations:**

- ✓ The food service account does not have an excess cash balance.
- ✓ All charges to the food service account are allowable.
- ✓ Indirect costs are not being charged to the food service account.
- ✓ Non-program foods and USDA Foods entitlements values and processing fees are reported on the Annual Financial Report.

**Technical Assistance:**

- Food service utilizes Scrips at nearby stores for food purchases. Scrips are beneficial for the school as they refund an amount of credit for shopping at a particular store. These refunds must be put back into the food service account.

*Unpaid Meal Charges and Bad Debt*

- When local officials determine collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as “bad debt.”
- When this uncollectible debt becomes bad debt, it is written off as an operating loss.
- Food service funds may not be used to cover costs related to the bad debt.
- These losses must be restored using non-federal funds such as the school district’s general fund, so a transfer must be made into the Nonprofit School Food Service Account to cover the loss.

**Paid Lunch Equity (PLE)**

A comprehensive review of this area was required due to a positive or zero food service fund balance as of January 31, 2018. No further action is required.

**Commendations:**

- ✓ Student lunch prices match the on-line contract and PLP report.
- ✓ Adult meal prices are appropriate based on the adult meal price requirements.

**Revenue from Non-program Foods**

**Technical Assistance:**

- Extra milks and adult meals are the only non-program foods sold by food service. If any additional non-program foods are sold, the [DPI non-program foods revenue tool](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) will need to be completed and updated on an annual basis (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

**4. GENERAL PROGRAM COMPLIANCE**

**Civil Rights**

**Commendations:**

- ✓ Annual Civil Rights training was completed for all food service staff.
- ✓ The Civil Rights Self-Evaluation (PI-1441) was completed.
- ✓ The Public Release was completed prior to the beginning of the school year.
- ✓ The *And Justice For All* poster was publicly displayed in the service area.

### Technical Assistance:

- Please note: the PI-1441 form must be completed by October 31. St. Clement School's form was completed on January 5.
- In order to avoid overt identification of students' eligibility status', prices of meals cannot be accessible to students at the POS. Either the meal prices are to be removed from the POS screen or blinders must be applied to the POS screen.

### Compliance Reminders:

- All program materials and information that is made public (posted, sent to households) **must** contain the USDA Non-Discrimination Statement. There is a shortened version available if the longer version does not fit on program materials: ***This institution is an equal opportunity provider.***

### 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. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements.
- School food service staff may make food substitutions, at their discretion, to accommodate student **without** 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. These accommodations made for students 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.

#### Findings and Corrective Action Needed: Civil Rights

**Finding #9:** The non-discrimination statement was missing from the local wellness policy (LWP).

**Corrective Action Needed:** Please submit an updated LWP.

**Finding #10:** The Confirming and Hearing Officials did not complete the annual Civil Rights training. This is required as these individuals have roles related to the approval of students for free and reduced priced meal benefits.

**Corrective Action Needed:** Please have these two individuals complete the training, sign off on the attendance sheet, and submit this to the consultant assigned to your review.

### Resources:

- [USDA Non-Discrimination Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights)
- [Special Dietary Needs Medical Statement](https://dpi.wi.gov/school-nutrition/national-special-dietary-needs-medical-statement) (https://dpi.wi.gov/school-nutrition/national-special-dietary-needs-medical-statement)

- school-lunch-program/special-dietary-needs)
  - [Civil Rights training PowerPoint and Attendance Log](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights)
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### Local Wellness Policy

#### Technical Assistance:

- A LWP is in place to set the standard for student, school, and community wellness. Develop your policy to include specific goals for your school and assess these goals annually to ensure your school is promoting local wellness to the best of its ability.

#### Compliance Reminders:

- LWPs are to be reviewed annually and assessed every three years.

#### Findings and Corrective Action Needed: Local Wellness Policy

**Finding #11:** The LWP is missing the following items from the LWP checklist: Policy Leadership, Foods Sold, Nutrition Education and Promotion goals, Other Strategies, Triennial Assessment, and Informing the Public.

**Corrective Action Needed:** Please resubmit an updated LWP including the missing items.

#### Resources:

- [LWP checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf)
  - [LWP builder](https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyNOCRd8SteFNmyA/viewform?c=0&w=1) (https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyNOCRd8SteFNmyA/viewform?c=0&w=1)
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### Professional Standards

#### Commendations:

- ✓ Professional Standards trainings are tracked and all employees are on their way to meeting the requirements for this school year.
- ✓ A new food service director was hired after July 1, 2015 and all hiring requirements were met. Thank you!

#### Technical Assistance:

- The Professional Standards trackers (manual or electronic) must include the following information:
  - Employee Name
  - Date of Hire
  - Position

- Reporting Period (e.g. July 1, 201X – June 30, 201Y)
- Total Training Hour Requirement
  - 12 hours (Director)
  - 10 hours (Manager)
  - 6 hour (full-time Staff) (i.e. more than 20 hours/week)
  - 4 hours (part-time Staff) (i.e. less than 20 hours/week)

Findings and Corrective Action Needed: Professional Standards

**Finding #12:** The Professional Standards training trackers utilized by the SFA contain insufficient information. The trackers do not contain the employees' dates of hire, positions, nor do they indicate whether or not they are full-time or part-time.

**Corrective Action Needed:** Please re-submit completed training trackers that contain all required elements.

**Resources:**

- [DPI's Professional Standards training tracker](https://dpi.wi.gov/school-nutrition/professional-standards) (https://dpi.wi.gov/school-nutrition/professional-standards)

**Food Safety and Storage**

**Commendations:**

- ✓ Storage violations were not observed.
- ✓ The food safety plan was site-specific and contained all required components (processes 1, 2, and 3; updated and signed employee reporting agreements; and all relevant Standard Operating Procedures (SOPs)).
- ✓ Temperature logs were maintained and all temperatures were appropriate.
- ✓ Two food safety inspections occurred in the previous school year.

**Technical Assistance:**

- All food must be stored in NSF food grade storage containers. Reuse of plastic packaging containers which contained purchased food may not be used per Wisconsin food code. "Single-use articles" means utensils and bulk food containers designed and constructed to be used once and discarded.

Findings and Corrective Action Needed: Food Safety and Storage

**Finding #13:** The most recent food safety inspection report was not publicly posted.

**Corrective Action Needed:** *Corrected on site. No further action required.*

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### Reporting and Recordkeeping

#### Commendations:

- ✓ The PLP report, FNS-10 report, and AFR were submitted on time.
- ✓ Records are kept on file for the required three years plus the current school year.
- ✓ Temperature logs are kept on file for the minimum requirement of six months.

#### Resources:

- [Calendar of Requirements](https://dpi.wi.gov/school-nutrition/calendar-of-requirements) (https://dpi.wi.gov/school-nutrition/calendar-of-requirements)
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### Summer Food Service Program (SFSP) Outreach

#### Technical Assistance:

- SFSP outreach is to be completed prior to the end of the academic school year to inform families of where meals are offered during the summer months.

#### Compliance Reminders:

- A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, **USDA requires 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 webpage](http://www.fns.usda.gov/summerfoodrocks) (http://www.fns.usda.gov/summerfoodrocks)

#### Findings and Corrective Action Needed: SFSP

**Finding #14:** SFSP Outreach is not completed by St. Clement School.

**Corrective Action Needed:** Send a completed draft of the outreach poster to the consultant assigned to your review.

#### Resources:

- [SFSP outreach poster](https://dpi.wi.gov/community-nutrition/sfsp/outreach) (https://dpi.wi.gov/community-nutrition/sfsp/outreach)
  - 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](mailto:amy.kolano@dpi.wi.gov)
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## Special Milk Program (SMP)

### Commendations:

- ✓ Milk is claimed in 8 fl. oz. portions.
- ✓ The student milk purchase price matches the price on the claim for reimbursement.
- ✓ Daily milk counts are comparable to the monthly claims and the five previous days' counts.

### Technical Assistance:

- Milk cartons must be discarded after being served to students. Once a carton is open, it cannot be placed back into the refrigerator for future service. Unopened cartons may only be placed back into the refrigerator for future service if kept on cooling devices during service or temped after service to ensure the milk is below 41 degrees Fahrenheit.
- Milks are to be priced accordingly so that the cost is kept as low as possible for households. In a pricing SMP, households may be charged an annual fee for milk or the students may be charged per carton.

### Resources:

- [SMP and WSDMP comparison chart](https://dpi.wi.gov/school-nutrition/milk-programs) (https://dpi.wi.gov/school-nutrition/milk-programs)
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“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](http://dpi.wi.gov/statesupt/every-child-graduate) webpage (http://dpi.wi.gov/statesupt/every-child-graduate).”



*With School Nutrition Programs!*