

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

School Food Authority: St. Joseph's School, Hazel Green Agency Code: 22-7576

School(s) Reviewed: St. Joseph's School

Review Date(s): January 14-15, 2019

Date of Exit Conference: January 15, 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:

- Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage, under Upcoming Trainings (<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 [SNT Webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts) webpage (<https://dpi.wi.gov/school-nutrition/training/webcasts>).
- 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](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 (USDA) 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 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.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Joseph's School for the courtesies extended to us during the on-site review and for being available to answer questions and provide 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. Your prompt attention lead to a productive Administrative Review.

The DPI review team appreciates the eagerness of the staff at St. Joseph's School for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through customer service, food safety, menu option and local wellness. We were impressed during meal service that students showed respect to the lunch servers.

The DPI review team is confident that St. Joseph's School will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

CERTIFICATION AND BENEFIT ISSUANCE

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

Fifteen eligibility determinations were reviewed with only one error identified.

Free and Reduced Price Meal Applications

- Thank you for processing applications 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.
- 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.

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.

Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications.
- The complete IEG grid may not be sent to the households applying for meal benefits or posted to the school website, as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either.

Household Size Box

- (TA) 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 that application to be considered complete.

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.
- Using the DPI template letters for household notification assures that the correct items are included; great job using those letters!

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant or runaway student, 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.

Public Release

- (TA) All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed; nice work in keeping the documentation.

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.

Direct Certification

- Thank you for running the Direct Certification matches in the required minimum 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.
- (TA) Consider running direct certification more often, like when you receive a new student and other times to pick up any newly eligible students. Keep in mind that once a child is provided meal benefits, they keep that eligibility for the remainder of the school year, unless there is documentation to support an increase in benefits from reduced to free meal status.

Transferring Students

- 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.

Independent Review of Applications

- (TA) LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year.
- (TA) St. Joseph's School had a 6.67% certification error rate. More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- (TA) The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for any non-program purposes. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).

VERIFICATION

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

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- (TA) The Confirming Official and Verifying Officials may only sign the application(s) selected for the verification process.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

MEAL COUNTING AND CLAIMING

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

- (TA) When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission; this includes correctly counting the check marks from each lunch service day.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

School Nutrition Accountability Software (SNACS)

- If the district would like to pursue an automated benefit issuance/verification software system and have access to an online application module, DPI provides a free program called [SNACS](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snacs-brochure.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snacs-brochure.pdf).

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff at St. Joseph's School for their warm welcome and cooperation throughout the administrative review. Thank you, also, for all your questions, willingness to learn and quickly implement recommendations and required changes. It has been a pleasure working with your staff.

Meal Pattern Requirements

The planned menu must be in compliance with all meal pattern requirements, both daily and weekly. Therefore, the printed menu, recipes, portion sizes on production records, options when counts are taken, etc., should reflect the menu and portion sizes as planned. Refer to the [Lunch Meal Pattern](#) table to ensure the requirements are being met. To assist in this, consider using a [menu planning worksheet](#) to help the menu planner in creating a menu that meets both the daily and weekly meal pattern requirements. These [instructions](#) provide more detail about how to fill it out. (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning). Technical assistance was provided for how complete a menu planning worksheet onsite.

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. They are also the SFA's way of proving that reimbursable meals were served; therefore, all items offered as part of the reimbursable meal must be recorded.

Ensure that production records list the meal pattern that is being used. St. Joseph is a pre-K through 8th grade school, however, due to current enrollment there are no students in 6-8 grade. Even though there might not be students from all age/grade groups in the school, because the K-8 meal pattern is being served production record should list the meal pattern that is being used. In this way it is very clear as to what meal pattern is being followed. The reviewer also suggests writing "preK is comingled" somewhere on the production records so that it is clear the school is following the USDA comingling flexibility.

Additionally, verify that all required pieces of information are included on production records. Planned number of servings and leftovers were never recorded for milk during the week of review. While there is

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

Vegetable Subgroups

During the week of review, the green beans were incorrectly credited as a Dark Green Vegetable, when they are in fact an Other vegetable. The green beans still count towards the daily vegetable requirement, just as an Other vegetable. In addition, iceberg lettuce was substituted for romaine lettuce, when romaine could not be served due to a recall. However, because the substituted vegetable was from a different vegetable subgroup, no dark green vegetables were then offered during the week of review. Best practice is to substitute vegetables within the same vegetable subgroup to ensure the weekly meal pattern requirements are still met. Refer to the [vegetable subgroup handout](#) to help categorize vegetables. (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#vegetable>). This handout was reviewed on site with the food service director.

Daily and Weekly Vegetable Shortages

During the week of review, December 3-7, 2018, there were both daily and weekly vegetable shortages. In addition, the Dark Green vegetable subgroup was missing for both entree options and the Red/Orange vegetable subgroup was missing for the PBJ entree option.

The required daily minimum to offer K-8 students is 3/4 cup vegetable and 3 ¼ cup vegetable is required to be offered over the week. The shortages were observed on the following days:

- Monday main entree: 5/8 cup vegetable (sauce on pizza [1/8 cup] and baked beans [1/2 cup])
- Monday PBJ: 1/2 cup vegetable (baked beans [1/2 cup])
- Tuesday main entree and PBJ: 1/4 cup total vegetable (hashbrown: 1 patty = 1/4 cup)
- Weekly: No Dark Green vegetable offered for either entree option
- Weekly: No Red/Orange vegetable offered for the PBJ entree option
- Weekly total vegetable offered: 3 ½ cup

These violations are subject to fiscal action since they were found during your SFA’s last administrative review and again during the present administrative review.

Signage

Adequate signage helps ensure that students accurately select reimbursable meals. Signage was available at the end of the serving line; however, it is recommended to reposition this closer to the beginning of the line. *Thank you for doing this while reviewers were onsite!* Visit our [Signage](#) page for additional signage resources (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Field Trips

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way to collect meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types.

For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf).

Milk

A variety of milk, at least two allowable milk types, is required to be offered daily at lunch. On Tuesday, December 4th and Friday, December 7th of the week of review, the number zero was written next to the 1% milk. Because it was written in the planned number of servings column, the reviewer assumed that no 1% milk was provided that day, only fat-free chocolate. However, after further discussion with the food service director, it was noted that the numbers listed for milk as written on production records was the amount that was used (ie, leftovers), not how much was provided. In this case two milk varieties were indeed offered to student. Technical assistance was provided to include the actual numbers of milk planned in the planned number of servings column, and include the number of milk leftovers in the far right-hand column of the production record. In this way there should be no confusion about the amount of milk planned and served.

School Breakfast Challenge

Make this school year the best one yet and see how easy it is to provide a healthy breakfast and a great start for every student. The Wisconsin Department of Public Instruction (DPI) School Nutrition Team is partnering with Hunger Task Force (HTF) and Share Our Strength's No Kid Hungry (NKH) to promote breakfast in Wisconsin schools through the Wisconsin School Breakfast Challenge. The challenge begins December 1, 2018 and ends February 28, 2019.

Schools across Wisconsin are invited to compete for prizes and recognition by increasing participation in their school breakfast program, or to start a new program if they do not already have one. As student participation grows, so do the chances for winning!

NKH will be providing the following amazing prizes:

- Grand Prize: \$1,000 for Highest Breakfast Participation Increase (2 Schools)
- \$750 Prizes for Most Improved Breakfast After the Bell (2 Schools)
- \$750 Prizes for Implementing School Breakfast Program (2 Schools)

Ready to get started? [Register your School](#) and visit the [Hunger Task Force](#) website to gather all the details. Considering a new School Breakfast Program? Contact DPISBP@dpi.wi.gov.

You may also use this [School Breakfast brochure](#) to share the benefits of breakfast with parents.

Child and Adult Care Food Program (CACFP) for Pre-K Students

Pre-K students are comingled with other age/grade groups. St. Joseph School is using the USDA flexibility to serve the K-8 meal pattern to all students.

3. RESOURCE MANAGEMENT

NONPROFIT SCHOOL FOOD SERVICE ACCOUNT

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

- The consultant addressed financial topics with the Food Service Director including 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.

- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- (TA) SFAs must limit the net cash resources in order to not exceed three months average expenditures. St. Joseph's School is working to reduce the ending fund balance by upgrading items in the kitchen.

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).
- When a student deposits funds in their lunch account which will be used for meal or milk 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 or the general fund 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, may not be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- (TA) 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". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
 - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
 - Under "Purchases Services" report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under "nonprogram foods", report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals and milk would be included here.
 - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

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.
- 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 on our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- St. Joseph's School recently created an Unpaid Meal Charge Policy to comply with USDA Policy Memorandum SP 46-2016 requiring all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. Great work!
- 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>
- 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 (PLE)

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

- St. Joseph's School was exempt from completing the Paid Lunch Equity tool for 2018-19 SY because of a positive fund balance in January, 2018.
- Refer to the [PLE 'In a Nutshell'](#) for more information on the PLE tool.
- Refer to the most recent [memo](#) from DPI.
- Refer to the most recent [guidance memo](#) from USDA.

REVENUE FROM NONPROGRAM FOODS

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

- (TA) Nonprogram foods include adult meals and milk purchases (for cold lunch or milk break). If you choose to sell extra entrees or juice, they are also considered nonprogram foods. St. Joseph would also include the transfer amount from the invoice for the teacher meals.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- (TA) Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- (TA) SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram->

revenue.pdf). If St. Joseph's School decides to sell juice to students at morning break, they would need to complete a Non-Program Food Revenue Tool.

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2018-19 SY) should be used to determine adult prices.
- St. Joseph's School transfers money into the food service account to offset a reduced adult lunch price for teachers. Thank you for invoicing the \$1.50 difference per teacher meal.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

INDIRECT COSTS

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

- DPI does not allow the annual assigned indirect cost rate to be applied to the foodservice account. 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 an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. 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.
 - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

4. GENERAL PROGRAM COMPLIANCE

CIVIL RIGHTS

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

- The "And Justice for All" posters is posted in public view where the program is offered.
- Civil rights training was conducted on a yearly basis. Consider including all teachers as they assist in the meal programs and any volunteers.

- The [Civil Rights Self-Evaluation Compliance](#) form (PI-1441) was completed by October 31. Thank you!

Nondiscrimination Statement

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

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- 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, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. 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>).

Processes for complaints

- All verbal or written civil rights complaints alleging discrimination within the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or the State Agency (DPI School Nutrition Team) within 5 days, per FNS Instruction 113-1 (Section XVII Section C, paragraph 2). You will want to make sure that this is included in the district procedures to ensure compliance.
- Additionally, per FNS Instruction 113-1, if an individual makes allegations of discrimination *orally* and “is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements” of the allegation for said individual. (Note: The items which should be included in the write up are listed in FNS Instruction 113-1.) Such complaints should then be forwarded to the State or Regional office, as appropriate, within the established timeframes.
- 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. An 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 Complaint 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 (TA)/Compliance Reminders

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance 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 the SFA 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. 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).

Resources:

- 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).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).

- 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>).

SMART SNACKS IN SCHOOLS

Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at St. Joseph School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>)

PROFESSIONAL STANDARDS

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

- 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 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.

Professional Standards: New Food Service Director Hiring Requirements

- The [hiring standards for SFA directors](#) are based on the size of the 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>).

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

- Directors: 12 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 (TA)/Compliance Reminders

- Water is required to be available at no charge to students during the lunch meal service. Thank you for allowing students to freely access the water fountain in the hallway.
- For more information on the water requirement, see [SP 28-2011](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/gm_sp_28_2011_r.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/gm_sp_28_2011_r.doc)

FOOD SAFETY AND STORAGE

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

- [A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofsf/food-safety-flashes). The [Office of Food Safety](http://www.fns.usda.gov/ofsf/food-safety) website (www.fns.usda.gov/ofsf/food-safety) includes food safety resources.
- The food safety inspection report was posted in public view. If there are more than one page, post each separately.
- All cooling equipment and the dishwasher had temperatures taken and recorded daily. A sanitizing log is also kept.

Food Safety Plans

- The Food Safety Plan was available for review. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- 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. 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>)

Food Employee Reporting Agreements

- (TA) All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>). The school nutrition director has a signed copy on file, but must also include the teachers who assist at lunch and the cashier.

BUY AMERICAN PROVISION

Comments/Technical Assistance/Compliance Reminders

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product. A “Domestic Commodity or Product” is defined as an agricultural commodity or product that is produced or processed in the United States using substantial agricultural commodities that are produced in the United States (products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States).

“Substantial” means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs.

If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can be accepted in an email. 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.

For products that are non-compliant with this provision, the following information must be recorded on a Buy American Non-Compliant Product List. *Note:* In reference the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

When completing the [Buy American Non-Compliant Product list](#) there are 4 pieces of information that must be recorded:

- 1) Date
- 2) Name of product
- 3) Country of origin
- 4) Reason
 - a) **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
 - i) *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
 - b) **Seasonality**- Product(s) is not available domestically during certain times of the year. (*SFA is required to record or list the months that the domestic product is not available.*)
 - i) *Ex. Blueberries are not available domestically during the months of December – June.*
 - c) **Availability** – Product(s) is not available to purchase domestically.
 - i) *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
 - d) **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
 - i) *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
 - e) **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - i) *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
 - f) **Other**- Please provide a written explanation.
 - i) *Ex. The SFA received a donation of non-domestic oranges*
 - ii) *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

REPORTING AND RECORDKEEPING

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- This is a link to the current [Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf) for general type schools (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf).
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain, even if the household is matched later on Direct Certification files.

SCHOOL BREAKFAST PROGRAM (SBP) AND SUMMER FOOD SERVICE PROGRAM (SFSP)

OUTREACH

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

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. Joseph's School 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](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

- 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

REVIEW AREAS

MEAL ACCESS AND REIMBURSEMENT

CERTIFICATION AND BENEFIT ISSUANCE

Findings and Corrective Action Needed: Certification and Benefit Issuance

☒ **Finding #1:** One application (KNRY1) had an incorrect number of household member names as compared to the number in the total household member box.

Corrective Action Required: Contact the household to complete this application and determine the correct meal benefits. **Corrected onsite 1-15-19.**

VERIFICATION

Findings and Corrective Action Needed: Verification

- ❑ **Finding #2:** The Confirming Official and the Verifying Official each signed the applications on file. The Confirming Official is only to sign the application(s) selected for the verification process before notifying the household to check that the original determination was correct.

Corrective Action Required: The Confirming Official and Verifying Official will participate in the [Verification webcast](#) on the [DPI training webpage](#) and submit a statement of completion (https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html), (<https://dpi.wi.gov/school-nutrition/training>).

MEAL COUNTING AND CLAIMING

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #3:** The monthly edit check is completed to determine the number of reimbursable meals to claim by eligibility for claim submission, but there were two days in the Review Month that there was an error in the number of check marks counted as compared to the number on the edit check used to submit the lunch claim.

Corrective Action Required: Please submit January 2019 lunch edit check and a statement of the process you will use to confirm that the edit check is correct before submitting the monthly lunch claim. Fiscal action will be calculated on the Review Month (December 2018).

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding #4:** Milk incorrectly documented on production records. Only the amount of milk used was being documented. Production records should include both the planned number of servings and the actual number used of each milk type.

Corrective Action Needed: Submit a statement that indicates your understanding to include both the planned number of servings and actual number of servings used for milk in the appropriate columns. In addition, submit two days, of your choice, of completed production records, ensuring that milk usage is correctly documented.

- ❑ **Finding #5:** Daily and Weekly Vegetable Shortages (see technical assistance above for more detailed information)

Corrective Action Needed: Submit a statement explaining how the daily vegetable shortages (including the missing vegetable subgroups) will be fixed for the week of review (December 3-7, 2018). In addition, submit a [K-8 menu planning worksheet](#) for the week of review to reflect the changes made.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

3. RESOURCE MANAGEMENT

NONPROFIT SCHOOL FOOD SERVICE ACCOUNT

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- Finding #6:** The Annual Financial Report has some revenues, but not expenses, allocated to nonprogram foods; the SFA sells adult meals and milk cards.

Corrective Action Required: Please provide a statement going forward that all nonprogram food expenses and revenues will be broken out from NSLP and allocated to the nonprogram foods line on the annual financial report. Use the [Nonprogram Food Revenue Tool Exceptions](#) resource on DPI's [Financial Management](#) website to aid you in this calculation.

Resubmit your SY 20 17-18 Annual Financial Report with nonprogram foods expenses broken out by category. To do this, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update. Send a copy to the consultant to complete this finding.

GENERAL PROGRAM COMPLIANCE

CIVIL RIGHTS

Findings and Corrective Action Needed: Civil Rights

- Finding #7:** The correct non-discrimination statement must be included on materials presented to the households about free and reduced meal eligibility and meals, including the application packet of materials, the household notification letters, the webpage that includes information about lunch and newsletters that provide reference to the National School Lunch Program.

Corrective Action Required: Submit a statement that the school website will have the non-discrimination statement on the page about meal programs, and the menu sent to families will have the short non-discrimination statement. **Corrected 1-16-19.**

LOCAL WELLNESS POLICY

Findings and Corrective Action Needed: Local Wellness Policy

- Finding #8:** The Local Wellness Policy (LWP) for St. Joseph's School meets some but not all requirements as required 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 areas which need updating are:
- Policy Leadership – identify the official responsible for LWP oversight
 - Public Involvement – permit the public to participate in LWP development
 - Food/Beverage Marketing- SFAs may only market products that adhere to Smart Snacks guidelines
 - Nutrition Promotion- Include at least one goal; consider using Smarter Lunchroom tools
 - Other School-based Strategies for Wellness – include at least one goal to explore the use of evidence based strategies
 - Triennial Assessment – include language for the completion of a triennial assessment
 - Update/Inform the Public – The SFA is required to inform the public about the content and implementation of the LWP.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule.

FOOD SAFETY

Findings and Corrective Action: Food Safety

☒ Finding #9: Food Employee Reporting Agreements must be on file for all school nutrition staff, including cashier and teachers who assist in serving.

Corrective Action Needed: Complete all missing agreements. Submit copies of completed agreements. **Corrected onsite 1-15-19.**

BUY AMERICAN

Findings and Corrective Action Needed: Buy American Provision

☒ Finding #10: The following canned items did not list a country of origin on their container:

- Canned tomato ketchup - Distributed by...
- Canned original baked beans - Distributed by...
- Canned carrots - Distributed by...

Corrective Action Needed: Submit a statement from the vendor or the product's manufacturer as to the country of origin. If unable to procure the product domestically, a non-compliant product sheet must be used. Submit documentation to the public health nutritionist for review. **Completed onsite, thank you! No further action is required.**

“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>).”



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