

Administrative Review Summary Report

School Food Authority: St John Lutheran

Agency Code: 247526

School(s) Reviewed: St John Lutheran

Review Date(s): Jan 4-5, 2018

Date of Exit Conference: Jan 5, 2018

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based.

Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives:

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

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- 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.

Household Size Box

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

Incomplete Applications

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

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year.

Disclosure

- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ Finding: The finding was that there was no signature of the determining official on applications in addition there was not a date listed when applicants were approved for meal benefits on the applications.

Corrective Action Needed: Please review certification process for applications and the role of the determining official. Submit a statement of in the future how the process of approving applications will be handled.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

Verification

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

Findings and Corrective Action Needed: Verification

❑ Finding: The finding was that there was no indication that a confirmation review took place.

Corrective Action Needed: Please review the verification website and verification webcasts and submit a statement on the process the SFA will use in the future regarding the confirmation review.

❑ Finding: The finding was that the documentation supplied for the selected application for verification by the household was not correctly determined by the SFA. The household was reduced and found to be paid. It appeared the SFA was using net income instead of gross income.

Corrective Action Needed: Please contact household and let them know their eligibility status will be changed to paid status. This error is noted on the SFA1.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Thank you to the food service staff at St. John's Lutheran Grade School for their dedication to providing appealing and healthy meals to students. Thank you to the food service director for sending meal pattern documentation prior to the on-site review.

Comments/Technical Assistance/Compliance Reminders

❑ Training: It is recommended that anyone involved with the school meals program attend DPI training classes. Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [training webpage](http://dpi.wi.gov/school-nutrition/training) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). Classes are offered in the summer and selected other times throughout the year. Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (dpi.wi.gov/school-nutrition/directory)

❑ Extras: Extra, self-serve items such as pickles, lettuce, tomato, cucumber, onion and cottage cheese are offered daily in addition to the reimbursable meal.

These foods are not being credited toward the meal pattern as it is after the point of service (POS), but must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium) for the week. While offering extra items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be difficult when these items are frequently served. Extras also add to the cost of the meal without the value of being creditable components of a reimbursable meal. If in the future the vegetables on this salad bar are to be credited toward the reimbursable meal, ensure portion sizes of at least 1/8 cup (1/4 cup for lettuce) are offered to students. If in the future the cottage cheese (or another meat/meat alternate) is to be credited toward the reimbursable meal, ensure that a portion size of at least 1/4 cup is offered to students, which credits as 1.0 oz. eq. meat/meat alternate.

Condiments, even when served as extras, can be a significant source of calories, saturated fat, and sodium in a meal. Currently, condiment usage is not monitored nor are portion sizes communicated to students. Please monitor your school's condiment usage and communicate appropriate portion sizes to students through signage. This can be done with a photo of what one tablespoon of Ranch dressing looks like or using signage such as "One pump, please!" on self-serve pump bottles.

❑ Sodium: The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined sodium limits using three targets, allowing for a gradual implementation of sodium reduction. Products that can be major contributors of sodium include condiments, dairy products, olives, pickles, salt, seasoning salt, and processed food items. Use of these products should be closely

monitored and limited to meet sodium requirements in this and upcoming school years. Please monitor and limit the use of Lowry's garlic and seasoning salts.

☐ Meat/Meat Alternate Crediting: When packing field trip meals, remember that 2 TBSP nut butter = 1 oz. eq. meat/meat alternate (M/MA). Students in grades K-12 require a minimum of 1 oz. eq. M/MA daily and a minimum of 9 oz eq M/MA weekly.

☐ Milk types on menus: The printed menu should list all components included with the reimbursable meal. While onsite, FSD updated menu to state that available milk types are offered.

☐ Measuring vegetable sticks: Portion sizes served must be full, level scoops using standardized measuring utensils. Carrots and celery sticks were not consistent in size and were not able to be measured. Because these types of vegetables are not consistent in size, an in-house yield study should be conducted to determine the number of carrot or celery sticks that are equivalent to ½ cup vegetable. Alternatively, consider using the Food Buying Guide (FBG) to determine the weight of ½ cup of carrots, for example. Weigh this amount on a scale and determine how many carrots this equals. As a reminder, a full ½ cup of fruit and/or vegetable must be selected under Offer Versus Serve (OVS).

☐ Second portions: When second portions of entrée items are offered and students are not charged a la carte prices, the calories, saturated fat, and sodium of these portions must be included in the weekly averages for dietary specifications (calories, saturated fat, and sodium). Please discontinue the practice of offering second servings free of charge to students. Keep in mind that if you are to charge for these second entrees, they need to meet Smart Snack Standards. However, entrees served the day of, or day after they are on the menu are exempt from the Smart Snack Standards.

☐ Signage: The National School Lunch Program requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at lunch. During lunch observation signage is not posted at lunch to show students what constitutes a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination. Signage examples can be found on our [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>). FSD corrected this on site by hanging general signage.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

☐ Finding #1: Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). Additionally, remember to collect new product labels annually. More information about crediting documentation can be found on the [Meal Pattern Components](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>).

Corrective Action Needed for Finding #1: Please submit current and accurate CN labels or PFS for the following products:

- Taco meat
- Chicken nuggets
- Meatballs
- Mozzarella breadsticks

☐ **Finding #2:** Standardized recipes were missing for several menu items offered during the week of review. Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Corrective Action Needed for Finding #2: Please submit a standardized recipe for the following:

- Tator tot casserole
- Tacos
 - Hard shelled tacos
 - Soft shelled tacos
- Spaghetti

☐ **Finding #3:** During the week of review, there was a daily grain shortage on the days that the tacos were served. Students could opt to take one hard shell taco. This provides 0.50 oz eq grains, which is less than the daily minimum requirement of 1.0 oz eq grain.

Corrective Action Needed for Finding #3: Please submit a written statement explaining how you will alter the menu to offer a minimum of 1 oz eq grain on days that hard shell tacos are served.

☐ **Finding #4:** All grains served and credited toward the meal pattern must be whole grain-rich (WGR), meaning 50% or more of the product must be whole grain. The remaining grain in the product, if any, must be enriched.

USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

The terms “wheat” or “made with whole grains” on a product label do not necessarily mean that a product is whole grain-rich. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as whole grain-rich. To do this, make sure the first ingredient has the word “whole” in front of the grain (i.e. whole corn, whole wheat, or whole durum flour). Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients.

The following grain products currently used are not WGR:

- Sliced bread (wheat) served on T 12/12, R 12/14, F 12/15
- Pasta (enriched) served on M 12/11

- Sara Lee Sweet Hawaiian rolls, Kwiktrip Multigrain sliced bread, Kwiktrip hamburger buns, Piggly Wiggly hot dog buns, 8 grain sliced bread, flour, and Great Value egg noodles flour in storage as of 1/4

Corrective Action Needed for Finding #4: Submit whole grain-rich versions of the products listed above including nutrition facts labels. Alternatively, submit a written plan for how you will eliminate the non-WGR items above.

☐ **Finding #5:** Staff and student servers were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. Some students observed at lunch/breakfast did not take a reimbursable meal. It is important for staff to fully understand the OVS requirements to ensure students are selecting reimbursable meals. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) is available on our website (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf).

Corrective Action Needed for Finding #5: Conduct or view OVS training for all food service staff, such as the [OVS webinar](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html). Provide documentation of all food service staff (including teachers or students who assist with meal service) attendance at this OVS training.

3. RESOURCE MANAGEMENT

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs 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.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.

- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are exempt from completing the USDA Nonprogram Food Revenue tool (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Adult Meals

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

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>)
- [Nonprogram Foods In a “Nutshell”](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>)

Annual Financial Report (AFR)

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.

- Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
- Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
- When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

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

Unpaid Meal Charge Policy

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

Findings and Corrective Action Needed: Revenue From Nonprogram Foods

□ **Finding:** The finding was that the there is no written procedure or policy made available to families regarding unpaid meal balances.

Corrective Action Needed: Please develop a written procedure or plan for unpaid meal balances. Please submit a statement regarding a timeline of when this will be completed. Please be sure to make this procedure or policy available to all households in a written format at the start of each school year.

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - **Utility charges - separately metered or current usage study by the local utility company.** See USDA [Indirect Costs Guidance](#) document. **Technical assistance was required.** (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>)
 - 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 district’s total.

Findings and Corrective Action Needed: Indirect Costs

❑ Finding: The finding was that the food service fund was being charged for utilities at 100.00 a month. This can only be done if the utilities used are metered.

Corrective Action Needed: Please submit a statement on how the SFA will address this issue.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

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

And Justice for All Poster

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

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

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

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

Overt Identification

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

Processes for complaints

- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time.
- However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
Technical assistance was provided.

Findings and Corrective Action Needed: Civil Rights

Finding: The finding was that the non-discrimination statement in the SFA handbook and on the SFA website was not the correct one.

Corrective Action Needed: Please submit a copy of what non-discrimination statement the school will use in the future.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010.

The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

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

Content of the Wellness Policy

At a minimum the wellness policy must include:

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

LWPs should include specific goals related to:

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

assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>). Please contact the following DPI specialists for additional guidance: Kelly Williams at 608-267-9120 or Alicia Dill at 608-266-2761. **Technical assistance required** and resources were left on-site.

Findings and Corrective Action Needed: Local Wellness Policy

□ Finding: The finding was that the wellness policy was not updated to meet all requirements. A committee needs to be in place, which should include a diverse group stakeholders. This committee needs to be available to the public to be able to participate. The policy once updated needs to be implemented and monitored. There is also a requirement to report on how the wellness policy goals are working within the SFA. This needs to be reported every three years.

Corrective Action Needed: Please submit a summary of when the policy will be updated. Include the titles of who will be involved in the committee and how the public will be made aware of the committee. Additionally please note in the statement how the plan will be implanted and monitored. Also included an understanding that the SFA is aware that there is public reporting requirement every three years.

Smart Snacks

□ Finding #1: 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. All exempt fundraisers must be documented. 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>).

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.

St. John's conducts fundraisers, such as the 7-8th grade candy bar sale. Fundraisers need to be documented, and they currently are not.

Corrective Action Needed for Finding #1: Submit written statement about who will be responsible for tracking fundraisers and what the tracking tool will be.

Professional Standards

Commendations/Comments/Technical Assistance/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, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

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

Annual Training Requirements for All Staff

Directors: 12 hours

Managers: 10 hours

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

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

If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Technical assistance was required regarding tracking of training hours.

Findings and Corrective Action Needed: Professional Standards

- ❑ **Finding:** The finding was that there was no tracking of training hours.

Corrective Action Needed: Please develop a tracking tool and submit a copy of this tool with all current trainings. In addition, please submit a statement on trainings the Food service staff plan to take in the future.

Water

Water was available and in good working order.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

A Flash of Food Safety is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The Office of Food Safety website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible. **Technical Assistance was provided to the SFA regarding contacting county sanitarian to obtain another copy of the past spring (May) inspection report, and keep to on file.**

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Food Safety Plans

- The Food Safety Plan was available for review.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. 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 webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Food Employee Reporting Agreements

- All food service employees must have a signed Food Employee Reporting Agreement on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Storage

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

Technical assistance was provided as it was noted that leftover food is being stored in containers that are not approved for reuse. **Technical assistance was provided** to SFA to use other containers that are approved for storage for leftover foods. It is encouraged to consult the local sanitarian on what is recommended for proper storage.

Technical Assistance was provided as it was observed that most products in refrigerator are not date marked and are not store in the original containers. It is advised to review the SOP on date marking and consult the sanitarian for additional guidance regarding date marking of food products.

Buy American

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

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

Technical assistance was provided including information on using the non-compliant form.

Findings and Corrective Action Needed: Food Safety and Buy American

Finding: There was not an Employee Reporting Agreement signed by food service staff.

Corrective Action Needed: SFA was provided a copy of the Employee Reporting Agreement. Please have all staff in food service review it and submit copies of all signed agreements. **Corrected on-site no further action needed.**

❑ **Finding:** The finding was it was noted that there was no documentation of temperatures being logged or test strips being utilized for the dish machine.

Corrective Action Needed: Please submit a week of dishwasher temperatures. Submit a statement on how often test strips are utilized.

❑ **Finding:** It was found that the health inspection report was not posted in a public place.

Corrective Action Needed: Please place in a visible location for the public to see.
Corrected on-site no further action needed.

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

Corrective Action Needed: Please submit copies of the non-compliant form for products found not in compliance.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

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. In addition edit checks, direct certification runs; etc must also be retained for the required record retention timeframe.

Summer Food Service Program (SFSP)

Commendations/Comments/Technical Assistance/Compliance Reminders

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

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program (SMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

Schools in the National School Lunch or School Breakfast Programs also may participate in the SMP to provide milk to children in half-day pre-kindergarten and kindergarten programs where children do not have access to the school meal programs.

Findings and Corrective Action Needed: SMP

❑ Finding: Finding was that the students that receive milk are able to be identified by age group and thus are required to follow through with the new guidelines for this age group.

Corrective Action Needed: Please adjust the process to meet the following regulations. Please submit a statement on how this will be handled in the future.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

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

