

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Our Lady Lake Catholic School

Agency Code: 27338

School(s) Reviewed: Our Lady Lake Catholic School

Review Date(s): February 21, 2018-February 22, 2018

Date of Exit Conference: February 22, 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. 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 Our Lady Lake Catholic School 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

- Fifty-seven eligibility determinations were reviewed, five errors were identified and one was corrected on site.
- The determining official was receptive to the TA provided and worked on clarifying the issues immediately.
- Thank you for having the DC runs completed during the appropriate time frames.

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.
- 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.
- 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 stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

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 with the household. 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.

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 that application to be considered complete.

Other Source Categorical

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

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding 1:** Four applications were determined incorrectly.

Corrective Action Needed: Use the adverse action template to notify families of their new determination and then submit an updated BI list. Due to the Determining Official being out of office for several weeks, be sure to adjust the benefits accordingly and manually if need be. When a benefit eligibility status increases, the change must take place within 3 days of the discrepancy. 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.

- ❑ **Finding 2:** Some of the applications had a FDIPR case number written on it, but SFA was not sure what the proper case numbers were for the Indian Reservations in the surrounding area.

Corrective Action Needed: Work with the local Indian Reservations to find out what an acceptable case number is. Submit a statement explaining what the acceptable case number is.

Verification

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

- When applications are selected 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.
- 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.
- Use DPI [Verification Tracker](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) (page 5) to track your verification process (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).
- It was observed that The "We Have Checked" Form only had the families name on it but was not dated or filled in. Be sure to sign and date this form before sending it to the family regarding their determined status. Save a copy for your records.

Findings and Corrective Action Needed: Verification

- ❑ **Finding 3:** The application selected for verification should have been originally denied based on income and not included in the verification pool. The family provided a tax return, but it did not support the application.

Corrective Action Needed: Send out the adverse action letter to the family selected for verification. They can fill out a new application with supporting documentation moving forward.

❑ **Finding 4:** Confirming official did not confirm that application was determined correctly.

Corrective Action Needed: Submit a statement of understanding that the confirming official is required to review all applications selected for verification prior to contacting the household.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ **Finding 5:** The software system used for meal counting and claiming had the students' eligibility status in the software incorrectly. This was determined to be a systemic claiming error, which will result in fiscal action.

Corrective Action Needed: Please work with your software company to clean up the benefit issuance list in the system as soon as possible. Once the problem is corrected, please submit the edit check for 30 consecutive operating days of clean information to support the claim. DPI will compare the new claim against submitted claims for the 2017-2018 school year.

❑ **Finding 6:** SFA was using a back out system for meal counts. The daily attendance sheet was used as the point of service (POS) check off sheet. Students were marked off if they took a reimbursable meal. The sheet was then given to the Food Service Director to go back in and uncheck the students who did not take a meal. Unchecking the students based on their attendance or if they take a meal is an inaccurate point of service, and considered a back out system. Students should be checked off in the POS after meal service if they took a meal.

Corrective Action Needed: Back out systems are not an acceptable point of service system. In the software there should be a separate area/column where the Food Service counts are entered. Please submit a statement as to how OLLCS provide a statement of how the software system will be modified to only check a student if they receive a meal.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

Thank you to the staff of Our Lady of the Lake Catholic School for their time and cooperation during the Administrative Review. Thank you to the school nutrition professional for providing documentation prior to coming on-site. A best practice was observed while on-site, that being, condiment usage for younger students is monitored and controlled by having an adult portion and serve instead of letting students self-serve. Thank you for your time and efforts to serve your students meals under the National School Lunch Program.

Technical Assistance:

Child and Adult Care Food Programs Pre-K Meal Pattern

- Because Our Lady of the Lake Catholic School serves Pre-K students, and they are not co-mingled with any K-8 students, **the updated Child and Adult Care Food Program (CACFP) meal pattern must be followed for Pre-K students.**
- The updated CACFP meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for School Food Authorities serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input.
- Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).
- For questions about the updated CACFP meal pattern, please contact our specialists: Tanya Kirtz at Tanya.Kirtz@dpi.wi.gov or Erin Opgenorth at Erin.Opgenorth@dpi.wi.gov.

Meal Pattern

- Currently, the age/grade groups served at Our Lady of the Lake Catholic School are Pre-K-3rd grade and 4th-8th grade. Two different meal patterns are followed for these age/grade groups, however, these meal patterns are obsolete. The meal patterns utilized for these age/grade groups for determining compliance for the Administrative Review were the K-5 meal pattern for Pre-K-3 and the K-8 meal pattern for 4-8.
- Rather than serving a K-5 meal pattern and a K-8 meal pattern, it may be beneficial to simplify to a K-8 meal pattern for all K-8 students. A K-8 meal pattern makes menu planning easier for school nutrition professionals, and Offer Versus Serve can continue to be implemented to minimize food waste.
- More information on meal patterns and menu planning for NSLP is available on the DPI [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

USDA Food Buying Guide for School Meal Programs

- The [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) for School Meals Programs contains yield and crediting information for foods with standards of identity, in large part, unprocessed foods (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Foods that do not have standards of identity are not listed in the *Food Buying Guide* and require further documentation, a Child Nutrition (CN) label or a product formulation statement (PFS) clearly detailing the ingredients and their creditable quantities, in order to be served in School Meal Programs.

Crediting Documentation

- Some of the documentation provided for the week of review was either not the correct item served or not up-to-date, and therefore, did not have accurate crediting information. Because food manufacturers continuously reformulate products used in schools, it is important to stay current with these changes and be confident that the documentation on file matches the products in stock. The School Nutrition Team recommends maintaining and organizing this information in a manner that is easy to reference and update, such as a binder or file folders divided into categories. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

- 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 CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that includes these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.
- When a CN label is not available for a product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs. 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 required 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).
- **If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for School Meal Programs, it may not be credited when served as part of the USDA School Meal Programs.**
- [USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) are organized by component and updated annually (https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets). CN labels can be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed.

How to Determine Whole Grain-Rich

- 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. 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. Note, a recipe that includes 50 percent whole grain and 50 percent enriched grain by weight is considered whole grain-rich.

Baked Beans Crediting

- On Tuesday, during the week of review, baked beans were served. On the production record, baked beans are listed under the meat/meat alternate category. Corn dogs were served on this day and exceeded the daily meat/meat alternate requirement, therefore, the baked beans were not needed as a meat/meat alternate in order to meet the daily requirement.
- Baked beans fall under the beans/peas vegetable subgroup. Other than the baked beans, no other bean/pea vegetable was served during the week of review.
- Because the baked beans were not needed as a meat/meat alternate on this day, the baked beans were credited toward the beans/peas vegetable subgroup, meeting the beans/peas vegetable subgroup requirement for the 4-8 students but not the Pre-K-3 students for the week of review. For more information, please see ***Finding #11***.
- Technical assistance was provided on this situation while on-site.

Mixed Salad Blend Crediting

- During the week of review, “garden salad” was served every day. The documentation provided off-site for the garden salad showed that it was a 100% romaine lettuce product, and therefore

a dark green vegetable. While on-site, it was discovered that this was not the product that was being served on the day of observation. It was also confirmed that this was not the product that was served during the week of review. The product that was served on the day of observation and during the week of review was a mixed salad blend that was romaine lettuce with iceberg, red cabbage, and carrots. A product formulation statement is not available for this product, so it cannot be determined how each vegetable contributes to the corresponding vegetable subgroup. Therefore, this product cannot be credited toward the dark green vegetable subgroup. Instead, it credits toward the “other” vegetable subgroup.

- The same mixed salad blend is used for the daily chef salad entree.
- There was another dark green vegetable, broccoli, served during the week of review. The dark green vegetable subgroup was met for the 4-8 students but not the Pre-K-3 students. For more information, please see **Finding #11**.
- **Note: This finding is for the School Year 2017-18 AR was also found during the School Year 2013-14 AR.**
 - ***“Vegetable subgroup requirements are not being met, mainly due to the usage of frozen mixed vegetables and a bagged mix salad that cannot be broken down to meet subgroup contributions. In order to credit the individual vegetables in a vegetable mix, we need a statement from the manufacturer documenting the contributions of each vegetable (ie. 50% carrots and 50% peas in a frozen mix, or 50% iceberg and 50% romaine in a salad mix). An alternative is to buy individual types of vegetables and make the mix yourself. Right now, all grades are not meeting the dark green vegetable requirement, because although romaine lettuce is being served, there is no way to determine the amount served because it is part of a pre-mixed bag.”***

“Additional” Vegetables

- The pea and carrot mix served on Monday and the mixed vegetables, vegetable blend bean medley, served on Friday during the week of review do not credit toward vegetable subgroup requirements. Because these mixes contain vegetables from multiple subgroups (carrots, peas, green bean, wax bean, dark red kidney bean, lima bean), including starchy vegetables from the starchy vegetable subgroup, it credits as an *additional* vegetable.
- These mixes still count toward the daily vegetable requirement, but do not count toward specific vegetable subgroups. The only way these mixes can credit toward specific vegetable subgroups is if there is a product formulation statement for each of these mixes with the amount of each vegetable in the mix.
- **Note: This finding is for the School Year 2017-18 AR was also found during the School Year 2013-14 AR.**
 - ***“Vegetable subgroup requirements are not being met, mainly due to the usage of frozen mixed vegetables and a bagged mix salad that cannot be broken down to meet subgroup contributions. In order to credit the individual vegetables in a vegetable mix, we need a statement from the manufacturer documenting the contributions of each vegetable (ie. 50% carrots and 50% peas in a frozen mix, or 50% iceberg and 50% romaine in a salad mix). An alternative is to buy individual types of vegetables and make the mix yourself. Right now, all grades are not meeting the dark green vegetable requirement, because although romaine lettuce is being served, there is no way to determine the amount served because it is part of a pre-mixed bag.”***

- Milk is a required component as part of the National School Lunch Program. **You must record daily usage by milk type on your production records.** If it becomes too time- or labor-intensive to record milk usage by type on production records, you may consider using a milk recipe. A milk recipe is documentation of average milk usage by meal and grade group. When a milk recipe is on file, total milk usage must still be recorded on production records, but it does not need to be recorded by type. Milk recipes must be updated twice per year or when you notice that students' preferences have changed. You can find instructions and a milk recipe template on our [Meal Pattern Components](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk) webpage, under the milk heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk>).

Second Portions or More

- When second portions, or more, of entrée items are offered and students are not charged 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).
- It is highly recommended that the school discontinue the practice of offering second, or more, entrées free of charge to students. This practice complicates production planning; increases food costs; is discriminatory if only offered to certain students and not all; and increases the likelihood meals exceed the dietary specifications. If students are still hungry, second entrées should not be given away free of charge, but could be sold a la carte.

Salt Shaker

- Currently, a salt shaker is available to students at the end of the service line. Salt shaker usage is not monitored nor are portion sizes communicated to students. Salt is not accounted for on production records and has not been accounted for in the dietary specifications (calories, saturated fat, trans fat, and sodium). It was noted that only a couple of students used the salt shaker, therefore, it is not deterring students from consuming components of the reimbursable meal. However, it is strongly discouraged to offer salt to students, as the sodium limits are set so that there is little room for additional sodium to be added after the rest of the meal is taken into account. ***Making a salt shaker available to students is an outdated practice and does not align with the intention of Child Nutrition Programs in helping students develop healthy eating habits.*** Sodium-free spices or a spice station are great alternatives to salt.

Condiment Signage

- Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Condiment usage is monitored and controlled for younger students. However, condiment usage is not monitored nor are portion sizes communicated to the students who self-serve. Please monitor your school's condiment usage and communicate appropriate portion sizes to students. This can be done by putting signage on the pump bottles that says, "One pump, please" or putting out portion cups of the intended portion size for students to use.

Cycle Menu Recommendation

- Using a cycle menu may ease the burden of menu planning once the cycle has been set and help ensure meal pattern requirements are met after a compliant cycle has been planned. Cycle menus may also aid in purchasing if production records are reviewed and analyzed to forecast meal counts based on historical data.
- When using a cycle menu, production records can be partially completed including menu items, crediting information, portion sizes, and planned quantities. Photocopies can be made, or if production records are managed electronically, they can be printed and the remaining information can be completed during production and after meal service.

Additional Resources:

Meal Pattern Components

- More detailed information on each component is available on the DPI [Meal Pattern Components](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern).

Vegetable Subgroups

- The [Vegetable Subgroup Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) is an excellent resource for determining what vegetable subgroup specific vegetables are categorized as (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf).

Portioning

- The [Institute of Child Nutrition](http://nfsmi.org/ResourceOverview.aspx?ID=250) has resources with recipe abbreviations, measurement conversions, portioning tools, and steam table pan capacities. Print-outs and posters can be found on their website (http://nfsmi.org/ResourceOverview.aspx?ID=250).

Training Opportunities

- It is recommended that anyone involved with the school meals program attend DPI training classes. Classes are offered in the summer and selected other times throughout the year. Numerous webcast training sessions are also available online. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the USDA requirements for the federal nutrition programs including menu planning, meal pattern, and production records. Information on summer classes will be sent to School Food Authorities in late spring and will also be available on the [DPI training](https://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).

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

❑ **Finding #1:** Prior to Pre-K-3 service on the day of lunch observation, it was noted that 3 ounce (oz) spoodles ($\frac{3}{8}$ cup) were being used to serve the planned $\frac{1}{2}$ cup of fruit and vegetables, and a #10 scoop ($\frac{3}{8}$ cup) was being used to serve the planned $\frac{1}{2}$ cup portion of buttered noodles. When this issue was addressed, the school nutrition professional said that 3 oz spoodles are used to serve $\frac{1}{2}$ cup portions and 4 oz spoodles ($\frac{1}{2}$ cup) are used to serve $\frac{3}{4}$ cup portions.

The school nutrition professional explained that this is how service has been done all year. From this information, the Menu Certification Workbooks were updated to assess the week of review with the 3 oz spoodle and 4 oz spoodle portion sizes instead of the planned portion size because the actual amounts served were less than the planned portion sizes.

The school nutrition professional corrected the spoodles and scoop prior to Pre-K-3 service, so 4 oz spoodles were used to serve $\frac{1}{2}$ cup of fruits and vegetables and a #8 scoop ($\frac{1}{2}$ cup) was used to serve $\frac{1}{2}$ cup of buttered noodles. These portion utensils were used for 4-8 meal service as well.

Corrective Action Required: Have the school nutrition professionals in charge of serving meals complete DPI SNT's [What's the Scoop with Portion Control?](https://dpi.wi.gov/school-nutrition/training/webcasts#pc) webcast and take the quiz. (https://dpi.wi.gov/school-nutrition/training/webcasts#pc). Submit the automatic emails after completing the quiz as corrective action.

❑ **Finding #2:** Production records provided for the week of review indicate that students are offered and are able to select a certain number of items that are counted, not measured. For example, during the week of review, Pre-K-3 students were offered 2 pizza dippers but were able to select 1-2 pizza dippers. 4-8 students were offered 3 pizza dippers but were able to select 2-3 pizza dippers.

Before lunch observation, the school nutrition professional explained that Pre-K-3 students are offered 5 chicken nuggets but are able to select 3-5, and 4-8 students are offered 6 chicken nuggets but are able to select 5-6. During lunch observation, offering was not happening. Instead, the school nutrition professional was serving and not asking students how many they would like. Some students received 3 chicken nuggets and others received 8 chicken nuggets.

When asking the school nutrition professional about service of the chicken nuggets and why some students received 3 and others 8, the school nutrition professional was unable to give a complete explanation.

By offering and serving students more or less than the planned portion size, this throws off forecasting, ordering, menu planning, and can be a factor in having excess leftovers and therefore food waste. This also does not allow point-of-service staff to be able to determine if meals are reimbursable. The school nutrition professional also stated they do not help in determining if meals are reimbursable, so there would not be an easy way for the point-of-service staff to know if meals are reimbursable or not unless they had a cheat sheet for each chicken nugget, pizza dipper, etc. amount.

For example, if a student were to select 3 chicken nuggets this is not a full grain component. The 3 chicken nuggets credit as 0.50 ounce equivalent (oz eq) grain and 1.00 oz eq meat/meat alternate. If a student were to deny the buttered noodles and only take 3 chicken nuggets and ½ cup fruit, this meal would not be reimbursable, even though it appears there are three full components, one of which is ½ cup of fruit and/or vegetable.

Corrective Action Required: Submit a written statement explaining how point-of-service staff will know crediting of menu items when actual serving size is not the planned serving size.

❑ **Finding #3:** While signage was present for lunch, the signage did not include the required statement that ½ cup fruit, vegetable, or combination must be selected under OVS. Please add a statement to your current signage that states students must take at least ½ cup fruit, vegetable, or combination.

If you are interested in ordering free signage, please visit the [Team Nutrition](http://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

Examples of signage can be found and printed from 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).

Corrective Action Required: Submit a picture or PDF of new or supplemental signage that has been posted.

❑ **Finding #4:** During lunch service 11 non-reimbursable meals were observed.

After providing technical assistance on portion utensils and corrective action was completed by switching the 3 oz spoodles to 4 oz spoodles, the school nutrition professional told the other server to not serve a full 4 oz spoodle of pears to the Pre-K-3 students. The reasoning behind not serving the full 4 oz spoodle was because it is “too much.”

Because the full 4 oz spoodle of fruit was not served, students that only selected fruit as their ½ cup of fruit, vegetable, or combination under Offer Versus Serve did not have reimbursable meals. There

were six non-reimbursable meals observed due to not having the required ½ cup of fruit, vegetable, or combination.

Five non-reimbursable meals were observed because students were served juice instead of milk. These five students did not have a signed medical statement on file indicating that juice should be served in place of milk. Please see **Finding #6** for more information.

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

Fiscal action will be assessed for these 11 non-reimbursable meals.

Note: Technical assistance on this finding was provided during the School Year 2013-14 AR. The following was written in the 2013-14 AR Report:

- **“Please make sure to offer all students the daily required amount of vegetable (¾ cup) and fruit (½ cup). The correct amount are being planned (verified on the production records), and all students on the day of observation left the line with the required ½ cup fruit and/or vegetable. However, in the serving line many of the younger kids were offered less than the daily minimum of ¾ cup, especially since leafy greens credit as half the volume served, so it takes 1 ½ cups of lettuce to credit as ¾ cup.”**

□ **Finding #5:** Because there is so much variation in portion sizes, Offer Versus Serve training should be completed with food service staff and point-of-service staff at Our Lady of the Lake Catholic School to ensure that reimbursable meals are selected. There is an [Offer Versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) webcast on DPI’s website that can be used for training (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).

Corrective Action Required: Please submit a signed training roster confirming that food service staff and point-of-service staff at Our Lady of the Lake Catholic School completed Offer Versus Serve training.

□ **Finding #6:** As explained in **Finding #4**, juice was served in place of milk. The students who received juice in place of milk were students who are lactose-intolerant or simply do not like milk. Serving juice in place of milk is an unallowable practice for students who are lactose-intolerant **without** a signed medical statement or for students who do not like milk. The only time in which milk may be substituted for another product is if a student has a signed medical statement by a practitioner.

According to page 76 of the Administrative Review Manual, “Program operators are not to promote or offer water or any other beverage as an alternative selection to fluid milk throughout the food service area. Signs describing the reimbursable meal must convey that milk is offered as a food component in a reimbursable meal and not as a beverage choice.”

If a student does not have a medical statement signed by a practitioner, a school has the following options:

1. The student turns down milk under Offer Versus Serve.
2. The school offers lactose-free milk. The lactose-free milk offered must be an approved milk type in the School Meal Programs.
3. The school offers a nutritionally equivalent non-dairy fluid milk, such as soy milk, but the school **must** have DPI approval to do this. If the school chooses to do this, the school does not need a medical statement, but they should only offer it to students who need it. This option is expensive, furthermore, it is unnecessary to offer it to everyone.

Corrective Action Required: Discontinue the practice of serving juice in place of milk immediately. Submit a written statement indicating understanding that juice cannot be served in place of milk unless a student has a signed medical statement by a practitioner, stating juice

should be served in place of milk. Explain Our Lady of the Lake Catholic School's plan for complying with offering the milk component.

Additionally, fiscal action is required for missing components. Because students were offered juice in place of milk, the milk component is considered missing because it impedes students' ability to select the milk component. Per page 76 of the Administrative Review Manual, "If any milk substitutions are made for non-disability reasons, in order for the meals to be eligible for Federal reimbursement, the SA must ensure the substitutions meet FNS nutrient requirements, as outlined at 7 CFR 210.10(d)(3)." Fiscal action will be assessed, but not be duplicated, for the day of observation as part of Finding #4.

❑ **Finding #7:** For the week of review, the chicken and gravy offered on Monday is unable to be credited based on the recipe provided. The recipe provided indicates there are 100 portions in the recipe and the portion sizes are $\frac{1}{2}$ cup or $\frac{3}{4}$ cup. However, it is uncertain how many $\frac{1}{2}$ cup or $\frac{3}{4}$ cup portions are in the recipe, and the total yield is not indicated. Therefore, a $\frac{1}{2}$ cup or $\frac{3}{4}$ cup portion of this recipe cannot be credited.

Corrective Action Required: Submit an updated recipe for chicken and gravy.

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 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.

❑ **Finding #8:** Documentation provided on-site for the week of review demonstrated a daily grain shortage at lunch on Thursday and Friday for both the Pre-K-3 and 4-8 students. The daily grain shortages occurred because the crackers served with the daily chef salad entree credit as 0.50 oz eq grain. On Monday-Wednesday, students had the ability to select the grain option offered on the service line (i.e. biscuit, buttered noodles, dinner roll). However, on Thursday and Friday, the entree option was a combined grain and meat/meat alternate option, so students were unable to select additional grain and only had access to the crackers.

Corrective Action Required: Submit a written statement explaining how you will meet the daily lunch 1.00 oz eq grain requirement for Thursday and Friday during the week of review. Detail your plan for ensuring the daily minimum grain requirement is met on days where a combined grain and meat/meat alternate entree option is offered and the students selecting the chef salad do not have access to additional grain for future service weeks. Please include respective portion sizes, labels, and recipes, if applicable.

Additionally, fiscal action is required for any repeat daily grain shortage violations from the previous Administrative Review. Therefore, fiscal action will be assessed. Per page 83 of the Administrative Review Manual, there will be a reclaim of meals with the insufficient grain quantity. All chef salad with crackers entrees served on Thursday and Friday will be reclaimed. The following repeat finding was documented from the School Year (SY) 2013-14 Administrative Review:

- **"There are not enough crackers offered with the entree salad to meet the 1 oz daily minimum of grain. Based on Exhibit A in the Food Buying Guide, for cracker, 1 oz equivalent of grain = 22 grams. You must serve at least 22 grams of crackers to meet the daily minimum for grain with the salad."**
- **The crackers served during the SY 13-14 AR credited as 0.50 oz eq grain, resulting in both a daily and weekly grain shortage at lunch.**
- **Note: This finding is for SY 17-18 AR is the exact same finding from SY 13-14 AR.**

Please note, repeat violations of a daily grain shortage during subsequent Administrative Reviews may result in fiscal action.

☐ **Finding #9:** Documentation provided on-site for the week of review demonstrated a weekly grain shortage at lunch for both the Pre-K-3 and 4-8 students because the weekly minimum grain requirement of ≥ 8.00 oz eq grain was not met. The Pre-K-3 students were offered a minimum of 6.00 oz eq grain and the 4-8 students were offered a minimum of 6.50 oz eq grain during the week of review.

Again, on Monday-Wednesday, students had the ability to select the grain option offered on the service line, but on Thursday and Friday were unable to select another grain option. This led to the Thursday and Friday daily grain shortages which led to the weekly grain shortage.

Corrective Action Required: Submit a written statement explaining how you will meet the weekly ≥ 8.00 oz eq grain requirement for the week of review. Please include respective portion sizes, labels, and recipes, if applicable.

Additionally, fiscal action is required for any repeat weekly grain shortage violations from the previous Administrative Review. Therefore, fiscal action will be assessed. Fiscal action will be assessed, but not duplicated, based on Finding #8. The following repeat finding was documented from the School Year (SY) 2013-14 Administrative Review:

- ***“There are not enough crackers offered with the entree salad to meet the 1 oz daily minimum of grain. Based on Exhibit A in the Food Buying Guide, for cracker, 1 oz equivalent of grain = 22 grams. You must serve at least 22 grams of crackers to meet the daily minimum for grain with the salad.”***
- ***The crackers served during the SY 13-14 AR credited as 0.50 oz eq grain, resulting in both a daily and weekly grain shortage at lunch.***

Please note, repeat violations of a weekly grain shortage during subsequent Administrative Reviews may result in fiscal action.

☐ **Finding #10:** Because 3 oz spoodles were used for service instead of 4 oz spoodles, as explained in **Finding #1**, there was a daily fruit shortage at lunch on Tuesday, Wednesday, and Thursday during the week of review for the Pre-K-3 students. The total amount of fruit offer to the Pre-K-3 students during the week of review was $2 \frac{3}{8}$ cups. The daily lunch fruit requirement is $\frac{1}{2}$ cup.

Corrective Action Required: Submit a written statement explaining how this error will be avoided and corrected for the week of review and for future service weeks.

Please note, repeat violations of a daily fruit shortage during subsequent Administrative Reviews may result in fiscal action.

☐ **Finding #11:** Because 3 oz spoodles were used for service instead of 4 oz spoodles, as explained in **Finding #1**, there were two vegetable subgroup shortages during the week of review for the Pre-K-3 students. The weekly dark green subgroup and beans/peas subgroup were not met because only $\frac{3}{8}$ cup of each subgroup were offered during the week of review. The weekly dark green and weekly beans/peas vegetable subgroup requirements are both $\frac{1}{2}$ cup for K-8 students.

Corrective Action Required: Submit a written statement explaining how this error will be avoided and corrected for the week of review and for future service weeks.

❑ **Finding #12:** Non whole grain-rich foods were served during the week of review and on the day of review. The amount of whole grains that were whole grain-rich (WGR) during the week of review were 34.2% for the Pre-K-3 students and 39.7% for the 4-8 students.

As a reminder, and as stated in Our Lady of the Lake Catholic School's 2013-2014 AR report, 100% of your offerings must be WGR. This includes processed entree items as well as additional grains like pasta and rice. Additional information on WGR, including how to determine if a product is WGR, can be found in the [USDA Whole Grain Resource fro NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#grain) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#grain).

The following items offered during the week of review or on the day of review were not WGR:

- Biscuit
- Bread used for grilled cheese sandwiches and peanut butter and jelly sandwiches
- Crackers served with daily chef salad

The school nutrition professional asked if Our Lady of the Lake Catholic School had a WGR exemption on file for this school year. Our Lady of the Lake Catholic School has never been granted a WGR exemption from DPI for any grain items. Technical assistance was provided on this prior to the on-site visit.

If the Our Lady of the Lake Catholic School can demonstrate a hardship in procuring, preparing or serving a compliant WGR product that is accepted by students, an exemption can be requested for that specific product. Review the August 23, 2017 memo, "[School Meal Flexibilities for School Year \(SY\) 2017-18](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf)" for more information on the exemption process (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf). **Note that until an exemption approval has been received, WGR products must continue to be served. Any non-whole grain-rich products served may not be credited towards the whole grain-rich requirement.**

Corrective Action Required: Submit labels for replacement products for the items listed above that are whole grain-rich or submit documentation for whole grain-rich exemption approval from DPI.

Please note, failure to meet the 100% whole grain-rich requirement during subsequent Administrative Reviews may result in fiscal action.

❑ **Finding #13:** Based on DPI SNT's Production Record "Must Haves" List on the [Production Record](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage, Our Lady of the Lake Catholic School's production records are missing information (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). The following items are missing or are not completely filled out on production records:

- Menu type
- Menu item with recipe name/reference number or product name/description
- Planned number of portions
- Total number of purchase units prepared for recipe items
- Total number of portions prepared
- Number of portions leftover
- Milk types available and actual usage by type (or milk recipe)
- Actual condiment usage and actual usage of "extra" menu items
- Substitutions made for students with special dietary needs (must have a dietary request form on file as supporting documentation)
- Daily chef salad with crackers entree
- Daily peanut butter and jelly sandwich

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Technical assistance was given on using volume measures (such as cups) to record portion sizes of fruits and vegetables, and using weight measures (such as ounces) to record portion sizes of meat/meat alternates and grains.

While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). For more information and a complete explanation of production record categories, please see [Instruction for Completing Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).

Corrective Action Required: Submit one week of completed production records for lunch with the above information added and filled in.

❑ **Finding #14:** Currently, recipes in the kitchen are missing essential information needed in a standardized recipe. Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements. The missing information includes:

- Recipe number/category
- Ingredients listed by form (canned, frozen, etc.) and any pre-preparation needed. The specific brands and product numbers of ingredients should be listed as much as possible.
- Specific total weight or volume of each ingredient (“1 can” is not specific)
- Steps for how to prepare the recipe
- Cook time(s)
- Temperature(s)
- Serving size for single portion(s). Note the serving size for each age/grade group
- Recipe yield:
 - Total number of portions based on the number of each portion size the recipe makes
 - Pan size(s)
 - Number of pans
 - Weight or volume in each pan
- Equipment used
- Portioning utensils to use

Use of standardized recipes is another important part of School Meal Programs. Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. **This same process must be done to standardize USDA quantity recipes, recipes off of cans and boxes, and any other recipe that was not initially written by your food service operation.**

Certain menu items do not have recipes. While on-site, certain menu items were able to be credited based on meal prep observation. For the menu items that do have recipes, essential information is missing and needed in order to be considered a standardized recipe.

The following menu items need standardized recipes:

- Daily chef salad with crackers entree
- Daily peanut butter and jelly sandwich
- Mashed potatoes

- Dinner roll
- Buttered noodles
- Meatballs and gravy
- Grilled cheese sandwich
- Tomato soup
- Apple crisp
- All vegetables with added butter and/or seasoning(s) served during the week of review

Corrective Action Required: Submit standardized recipes for the menu items listed above.

Please use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the [Meal Planning](http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>).

We encourage viewing the webcast, [What's the Yield with Standardized Recipes?](http://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

❑ **Finding #15:** Currently, the daily chef salad with crackers entree and daily peanut butter and jelly sandwich are not listed on the printed menu. All components that are part of the reimbursable meal must be included on the menu. The daily alternate entree options must be either listed on the daily menu or a statement on the menu may be included that says a chef salad with crackers and a peanut butter and jelly sandwich are offered daily as an alternate entree option.

Corrective Action Required: Submit a copy of the updated printed menu that includes the daily alternate entree options.

- **Note:** *This finding is for the School Year 2017-18 AR was also found during the School Year 2013-14 AR.*
 - *“The printed menu does not include the USDA non-discrimination statement. Nor does it communicate the milk choice or alternate daily entrees of PB&J and salad.”*

NOTE: When reviewing the findings listed in this report, it has been determined that changes to bring Our Lady of the Lake Catholic School’s nutrition program into compliance could be done within the 60 day corrective action timeline. Since some of the findings appear to be systemic, because they were found during the last AR, if corrections are not made and corrective action is not received by reviewers by June 1, 2018 the additional Performance Based Funding (six cents per lunch reimbursement) may be withheld.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

- Financial topics with the Business Manager were discussed 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).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

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 into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The [16-17 Annual Financial Report instructions](#) 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 purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- 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 "Ala Carte", 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 would also 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 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 on 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 to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding 1:** SFA did not have a written unpaid meal charge policy, which was required to be in place and distributed to families by July 1, 2017.

Corrective Action Needed: Please develop a timeline for a written unpaid meal charge policy and provide your plan on how this will be distributed to households.

- ❑ **Finding 2:** Students were taking second meals, entrees and side dishes free of charge. All extra food came out of the food service funds. Under NSLP, second meals are **not** allowed. An additional entrée is considered a Nonprogram food and would need to be charged “a la carte” prices. Students are allowed to take extra fruits and vegetables if they choose, at no cost. OLLCS has three different options moving forward (see below). Nonprogram foods – extra entrees need to be priced out using average meal costs across a week using the [Menu Raw Food Costing tool](#) and the DPI Non Program Food Price Calculator Tool to set the price of an extra entrée.

Corrective Action Needed: Please select one of the three options below and submit a statement of how second entrees will be addressed, along with the tools listed in that option.

1. OLLCS can charge students an “A La Carte” price for an extra entrée. The Nonprogram Foods Tool will need to be completed to develop the “a la carte” price of entrees. Submit the Nonprogram Food Tool.
2. OLLCS can eliminate the option of second entrees.

❑ **Finding 3:** Annual Financial Report does not have any revenues or expenses allocated to nonprogram foods; SFA sells adult meals, extra cold lunch milk.

Corrective Action Needed: 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. We have a [resource](#) on our website to aid you in this calculation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

❑ **Finding 4:** On the Annual Financial Report, the revenues and expenses were not broken out into the right categories.

Corrective Action Needed: Please resubmit your 16-17 Annual Financial Report with revenues and expenses broken out by program and category. See the [16-17 Annual Financial Report instructions](#). 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.

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 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.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- 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 (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<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>)

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to nonprofit school food service account. For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- 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>).
- 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:
 - 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.

Findings and Corrective Action Needed: Indirect Costs

☐ **Finding 5:** Trash removal costs were divided between the church, to the nonprofit school food service account and the school. Twenty-five percent of the trash was allocated to the nonprofit school food service account. An indirect cost study was not completed to determine this calculation. In order to charge an amount to food service, methodologies for determining the cost must be specified and supported through documentation.

Corrective Action Needed: Please submit a detailed statement outlining how the agency will proceed. The SFA has two options.

1. Discontinue charging indirect costs to the food service account completely. A fund transfer will be required to cover the indirect costs allocated to the Food Service Account for the 2016-2017 school year and the current 2017-2018 school year.
2. Conduct a one-week trash bag study, this must be completed annually. This can be done by counting the total amount of trash bags used by the Food Service Program, compared to the total amount of trash bags used by the school and church for one week. Once completed, compare the costs and submit the results.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFA completed the Civil Right Self-Evaluation Compliance form before October 31, well done!

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 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.

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.

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>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- 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>).

- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints
(https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

☐ **Finding 1:** Nondiscrimination Statement on menu is an outdated version. The sheet created by the SFA to inform households of the meal pricing options, must include the nondiscrimination statement.

Corrective Action Needed: Submit a copy of the menu with the current Nondiscrimination Statement. **“This institution is an equal opportunity provider.”** Submit a copy of the meal pricing options with the full nondiscrimination statement on it.

☐ **Finding 2:** During meal service, students were not served the same portion sizes. All students should have been receiving the same planned amount of food. Some students received 5 chicken nuggets while others received 7. Other students were receiving double the portion size of pasta compared to their peers. Some students were also given an option of 100% fruit juice, while others were not offered this option. Medical statements for special dietary needs were not on file stating that the children must receive juice instead of milk as substitute.

Corrective Action Needed: Submit a detailed statement on how OLCCS will discontinue this practice and provide all students with the same quantity and types of food being offered.

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

- On-site monitoring does not need to be completed for SFA's with less than two schools.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

Content of the Wellness Policy

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

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

Findings and Corrective Action Needed: Local Wellness Policy

❑ **Finding 3:** SFA LWP meets some but not all requirements as stipulated above.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule. Update the policy to state who will oversee the policy, how the public will be notified of changes/how they can get involved, information regarding the triennial assessment and information on selling Smart Snacks during the day.

Smart Snacks

Compliance Reminders:

Final Rule

- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on

our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Fundraisers

- If Our Lady of the Lake Catholic School chooses to have fundraisers in the future, please note WI DPI allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times.
- Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations. 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).

School Day

- All foods (vending machines, school stores, fundraisers, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the “Smart Snacks” regulations.

Technical Assistance:

Food Marketing

- The soda machine at Our Lady of the Lake Catholic School contains a picture of non-compliant products. According to [SP 24-2017 Local Wellness Policy: Guidance and Q&As](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP24-2017.pdf), food marketing commonly includes oral, written, or graphic statements made for the purpose of promoting the sale of a food or beverage product (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP24-2017.pdf).
- Marketing standards apply to various equipment, such as the exterior of vending machines, menu boards, coolers, trash cans, and other food service equipment. Therefore, all food or beverage products depicted on items/equipment on the school campus during the school day must meet the Smart Snacks nutrition standards.

Resources:

Smart Snacks Product Calculator

- If Our Lady of the Lake Catholic School chooses to serve snacks outside of NSLP, it is highly recommended to use the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

Findings and Corrective Action Required for Smart Snacks:

❑ **Finding #1:** There is a soda machine in the food service area that sells non-compliant products. The soda machine is on during the school day. According to the principal, the soda machine is monitored so students cannot purchase from it. The principal also stated that students know they cannot buy anything from it during the school day. During lunch, there is staff around so students cannot purchase it. Outside of meal service times, however, there is not a way to monitor students. Technical assistance was provided on-site.

Corrective Action Required: Submit a written statement detailing Our Lady of the Lake Catholic School's plan for bringing this vending machine into compliance during the Smart Snacks defined school day.

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 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>).
- 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, 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](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.

Findings and Corrective Action Needed: Professional Standards

❑ **Finding 4:** A centralized tracker was not used to keep track of the staff training hours. Staff have not completed the required training hours for the current school year and did not have a training plan for the current school year.

Corrective Action Needed: Please provide a centralized tracker with the current training hours and a plan for completing the rest of the required training hours for all food service staff.

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

- Great job on providing water to all students.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

- All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.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.
- It was observed on one of the days that a food service staff member had a bloody nose. SFA took proper protocol and sent the staff member home. Incidents like this enhance the need for having proper procedures and agreements on file.

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. Boxes were observed on the floor in the storage room. Cans were dented.
- The freezer was packed to the top and was used for both the church and food service. This makes it difficult to determine, whose food was whose and how long products have been sitting in the freezer. SFA should practice the first in, first out method for handling food products.

Time as Public Health Control

- When using "Time as a Public Health Control:"
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.

- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action Needed: Food Safety and Buy American

☐ **Finding 5:** [Food Employee Reporting Agreement](#) was not on file.

Corrective Action Needed: Please submit a signed copy of this agreement for all staff working in the kitchen. The cook submitted a copy but other employees working in the kitchen need to submit a file as well.

☐ **Finding 6:** Gloves were not worn when students were coming up for seconds. One girl handed the cook a half-eaten chicken nugget. The server continued to serve students without gloves while holding the chicken nugget. This is a public health hazard. SOPs were found in the Food Safety Manual for hand washing and glove use.

Corrective Action Needed: Please review the glove use SOP and watch the [handwashing videos](https://www.fns.usda.gov/ofsf/food-safety-flashes) (<https://www.fns.usda.gov/ofsf/food-safety-flashes>). Submit a statement of understanding on the importance of glove use.

Buy American

Compliance Reminders:

- The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - The following products may be exceptions to the Buy American provision: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
 - 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.
 - What is acceptable to determine compliance on a label? Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.

- Any non-domestic product delivered to the school, without prior, written approval of the Food Service Director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Required for Buy American:

□ **Finding #1:** The following products were identified in the SFA's storage area as non-domestic. Our Lady of the Lake Catholic School does not have a Buy American – Noncompliant List or SFA equivalent form.

The following products found are non-compliant:

- Canned pineapple- product of Indonesia
- Canned Mandarin oranges- product of China
- Canned fruit cocktail- product of Thailand
- Frozen crinkle sliced carrots- product of Canada

Corrective Action Required: Begin using a Noncompliant Product List for tracking non-domestic products. Provide a copy of the form that will be used and include any non-compliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A [template form](#) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

□ **Finding #2:** The following products identified in the SFA's storage did not have proper labeling to identify the country of origin.

The following products are non-compliant:

- Pasta- distributed TX
- Taco shells- distributed TX

- Ranch dressing- distributed CA
- Seasoned salt- packed in the USA
- Canned salsa- packed in the US
- Canned potatoes- distributed ID
- Cheese slices- distributed MN
- Shredded cheddar- distributed WI

Technical Assistance, No Corrective Action Needed: In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the Technical Assistance section above for sample certification language. This will be treated as technical assistance for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you for keeping all documentation on file for three years plus the current school year.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFA promotes and operates the summer food service program.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

- Point of service was done accurately. Teachers operated the WSDMP in their classrooms.
- It was noted that cost per pint of milk was roughly \$.44, which is a high cost for milk.
- Both the public release & the accounting system being used state that the SFA participates in the Special Milk Program, which is a federal program. However, the SFA is in WI School Day Milk Program, which is a separate state operated program. When sending out the public release, be sure to change update this part.
- The document created by the school with the meal and milk prices had listed the WI School Day Milk program as an option for K-6 graders. On-site it was discussed and made clear that the program was only for K-5. Be sure to update the age groups for next year. WSCMP is only for K-5.

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).

