

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

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**School Food Authority: St. John Lutheran School**

**Agency Code: 28-7507**

**School(s) Reviewed: St. John Lutheran School**

**Review Date(s): 4/30/18-4/30/18**

**Date of Exit Conference: 4/30/18**

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

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

**General Program Reminders/Updates:**

**GOALS**

- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).

**SOCIAL MEDIA**

- Submit photos to the School Nutrition Team to be posted on the DPI SNT Facebook page, Twitter page or Instagram page. Send photos to Dana Colla at [dana.colla@dpi.wi.gov](mailto:dana.colla@dpi.wi.gov).

**SNSDC TRAININGS**

- The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer in Green Bay, Wausau, Rice Lake, Madison and Milwaukee. There will be emails sent in the coming months regarding the trainings available at these locations. You may also check back on the [School Nutrition Team training website](#).

**Appreciation/Commendations:**

Thank you to the Authorized Representative and School Food Service Manager for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. 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.

Thank you for all that you do to feed the students healthy meals!

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Commendations:

- Applications were determined in a timely manner. The official's organization of the requested benefits information made it easy to review.
- Direct Certification is run early and often which is a best practice. Great work!
- Benefit Issuance list is updated as needed, and includes all necessary information.
- 21 eligibility determinations were reviewed; 0 errors were identified.

##### Technical Assistance/Compliance Reminders

##### Applications

- When the household lists a 10 digit case number but forgets to include the name of the program it is for, follow up with the household to get the name of the program and document this on the application.
- It is not necessary to annualize income when the household has listed one income or if the household has listed one pay frequency for all income in the household.

##### Adverse Action

- 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. (Example: If the adverse action letter is sent out on October 30, the date the status would change would be at the end of the day on November 8 so that starting November 9 the student(s) would have a new eligibility status.)

##### Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need)
  - Major employers contemplating or experiencing large layoffs
  - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.
- Consider working with the local public school district to submit the public release together each year.

##### Transferring Students

- If a student had a free or reduced price meal eligibility at his/her prior school, the former school can provide a copy to the school the student is transferring in to.
- The start date of eligibility is the date the Determining Official reviews and determines the application, signing and dating it.

## **Verification**

### **Comments**

- Verification began the first week of October, as the sample size determined 1 application had to be verified.
- The household selected for Verification responded and was changed to reduced status
- The eligibility should be changed 10 days from the date the “We Have Checked” letter was mailed out.
- DPI template letters were used and all Officials signed off on the verified application.
- Verification process was completed prior to the November 15 deadline.

### **Technical Assistance**

- When a household submits multiple pay stubs, be sure to average out the gross income when analyzing the income and comparing it to the Eligibility Guidelines.

### **Meal Counting and Claiming**

#### **Commendations**

The Lunch claim for March was done correctly with no errors.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations**

Thank you to the food service staff at St. John Lutheran School for providing documentation prior to the review and while on-site. The food service director was friendly, helpful and asked good questions to help better her understanding of meal pattern requirements. Your dedication to serving students makes a difference! Offer versus serve was well implemented during lunch meal service.

### **Comments/Technical Assistance/Compliance Reminders**

#### ***Training***

School nutrition staff is strongly encouraged to attend the summer trainings offered by the DPI School Nutrition Team. The Whole Enchilada, Offer vs. Serve, Tech Tools (course name subject to change), and Adding it Up would be very beneficial. Classes will be offered at five locations around the state, including Madison (July 16-19) and Milwaukee (August 21-23).

#### ***Meal Pattern Requirements***

When multiple entrées are offered, the weekly minimum meat/meat alternate is determined by the sum of the daily meat/meat alternate minimums for the week (the daily minimum is determined by the entrée offering the least amount of meat/meat alternate). The same is true for determining the weekly grain minimum.

- For the K-8 meal pattern, the weekly grain minimum is 8 oz eq and the weekly meat/meat alternate minimum is 9 oz eq, so it is important that the daily grain and meat/meat alternate minimums are more than 1 oz eq most days of the week.

Menu planning worksheets are very helpful tools for ensuring meal pattern requirements are met at both breakfast and lunch (particularly vegetable subgroup requirements). They can be found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage, under the Menu Planning Tools heading (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Rather than serving a K-5 meal pattern for K-3 students and a K-8 meal pattern for 4-8 students, 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 is in place to minimize food waste. Currently, the only differences between what is offered to each grade group is the portion size on a few entrees such as mini corn dogs.

### **Portion sizes**

Proper portion size utensils should be used. Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e. the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches children good eating habits by demonstrating and providing appropriate portion sizes of each food group at a meal. Food costs are controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase.

### **Crediting**

It is important for point of service staff to know how raw vegetable credit. Therefore, the quantity of each vegetable needed to credit as a specific volume must be determined. This has been done using the [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) for carrots, celery, grapes and apple slices (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). If products received are a significantly different size than usual, or if other fresh fruits/vegetable are offered, an in-house yield study is recommended. This can be done one of two ways. For example, to determine how many baby carrots equals  $\frac{1}{4}$  cup, either:

1. Dice up the carrot sticks and determine the how many are needed to fill a  $\frac{1}{4}$  cup spoodle.
2. Calculate the weight of  $\frac{1}{4}$  cup of carrots using the Food Buying Guide and determine the average number needed to provide that weight using a scale.

For more information on in-house yield studies, review the [procedures](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf>), which are available on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

It is the responsibility of the school nutrition staff to check orders as they are received to ensure that the correct products were provided, that proper documentation is available and that all grain credited towards meal pattern requirements are whole grain-rich. For additional information on what qualifies as whole grain-rich, review the [USDA Whole Grain Resource](https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf) (<https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf>).

The Campbell's tomato soup must be credited using the [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs), unless a product formulation statement (PFS) is on file from the manufacturer (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Using the Food Buying Guide, the  $\frac{1}{2}$  cup serving of tomato soup would credit as  $\frac{1}{8}$  cup of other vegetable. However, using the [PFS](https://www.campbellsfoodservice.com/campbells-food-service/wp-content/uploads/sites/18/2018/01/00016-415003382406v0001-campbell-s-tomato-soup-condensed-50-oz.pdf) found on Campbell's website, the  $\frac{1}{2}$  cup serving can credit as  $\frac{3}{8}$  cup red/orange vegetable (<https://www.campbellsfoodservice.com/campbells-food-service/wp-content/uploads/sites/18/2018/01/00016-415003382406v0001-campbell-s-tomato-soup-condensed-50-oz.pdf>).

It is important to clearly document the vegetables that are offered. For example, snap peas were served on Thursday, March 8<sup>th</sup>, but were recorded on the production record as "peas." Snap peas are part of the 'other' vegetable subgroup, while green peas are part of the starchy vegetable subgroup. The [vegetable subgroup table](#) on our website is a great reference or subgroups can also be confirmed

using the USDA Food Buying Guide (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>).

### **Recipes**

Standardized recipes are required for all menu items that have more than one ingredient (ex. mashed potatoes). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made or when optional ingredients are included. Both a weight and measure should not be included for each ingredient as they can be slightly different and result in inconsistent crediting. Instead, record weight OR measure based on how the recipe is prepared. Instructions for standardizing recipes and recipe templates can be found on the [Recipe Resources and Tools](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) section of our website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

### **Production Records**

Production records are intended to be useful tools to record information prior to production, during production, and following production. While there is no required template, the [production record template](#) found on our website can be helpful in ensuring that all of the [production record requirements](#) are met (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). Additionally, all items offered as part of the reimbursable meal must be documented, including items offered with the alternate entrée options.

The template currently in use separates each component, which can make it difficult to record combination items (such as mini corn dogs) or recipes that contribute towards multiple components (such as the toasted cheese sandwich). A different template will consolidate the documentation of these items to one line where contribution to different components of the meal pattern can be indicated. Additionally, if a standardized recipe is on file, that recipe can be recorded once on the production record (toasted cheese sandwich) rather than splitting up the ingredients (bread slices, cheese).

For the week of review, milk types documented on the production record included 1% chocolate and 1% (white). However, based on communication with the SFA prior to the review, actual milk types available include fat free chocolate and 1% white. This was confirmed during the on-site review.

### **Findings and Corrective Action Needed**

**❑ Finding #1: The peanut butter and jelly sandwich offered as an alternate entrée option daily only credits as 1 oz eq meat/meat alternate resulting in a weekly meat/meat alternate shortage.**

Note that this shortage was documented as a finding during the previous Administrative Review. The report indicated that immediate corrective action was agreed to onsite and a 1 oz eq cheese stick would be offered with the sandwich.

*As a weekly meat/meat alternate shortage was found during the previous administrative review, this is a repeat violation and will result in fiscal action. The peanut butter and jelly sandwich meals from one day during the week of review will be reclaimed.*

**Corrective Action Needed:** Please submit two weeks of completed production records for lunch as well as a statement describing what will be offered with the peanut butter and jelly to ensure that the weekly minimum requirement for meat/meat alternate is met.

❑ **Finding #2: The following bread served during the week of review and during the on-site observation was not whole grain-rich:**

**Corrective Action Needed:** Submit a photo or photocopy of the label for the new bread that will be used once it is received. The ingredient list and nutrition fact label should be included.

❑ **Finding #3: The bread offered with the hot dog, chicken nuggets and used for the peanut butter and jelly was not whole grain-rich and was also only 25g per slice. Therefore, 1 slice of bread credits as 0.75 oz eq grain, and 2 slices credits as 1.75 oz eq grain.**

This resulted in a daily grain shortage for the hot dog entrée on Wednesday 3/7/18 as the only grain offered was 1 slice of bread. Additionally, a weekly grain shortage resulted.

**Corrective Action Needed:** The label requested in Finding #2 will fulfill the corrective action needed for this finding as well. As long as the new bread is 28g per slice and is whole grain-rich, the grain shortages will be corrected.

*Please note that repeat violations involving daily and weekly quantity shortages on future Administrative Reviews may result in fiscal action.*

❑ **Finding #4: : The production record template for lunch does not meet all of the [production record requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). The following information was missing from the template or incompletely filled in:**

- Planned number of servings
- Number of portions prepared
- Milk count by type
- Planned portion size for each item

It is crucial that all items offered as part of the reimbursable meal are documented on the production record, including bread offered with the hot dog.

**Corrective Action Needed:** Submit two weeks of completed production records that meet fulfill all of the production record requirements. The same two weeks can be submitted for both Finding #1 and Finding #4.

❑ **Finding #5: Standardized recipes were not available for the following:**

- Chocolate chip cookie (quantity recipe provided)
- Sloppy Joe (quantity recipe provided)
- Tomato soup
- Mashed potatoes

**Corrective Action Needed:** For each of these recipes prepared prior to the end of this school year, standardized the recipe to your operation with the specific products and procedures used and

verify yield. Submit the completed recipes. Any recipes that are not on the May menu, please submit a written statement with your agreement to complete the recipe standardization process when they prepared next school year.

**❑ Finding #6: The planned menu must clearly show all components offered as part of the reimbursable meal. Currently, only the main entrée is shown on the menu.**

Additionally, a non-discrimination statement must be added to the posted menu. Per USDA, if the material or document is too small for the entire statement, you can use the shortened statement: This institution is an equal opportunity provider.

**Corrective Action Needed:** Submit the May menu showing all components and the non-discrimination statement.

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

### 3. RESOURCE MANAGEMENT

#### Commendations

##### PLE Tool

- SFA is running the PLE tool correctly and adhering to the required lunch price increases every year by exceeding the necessary 10 cent weighted average increase.
- USDA has released the 18-19 SY PLE tool and is allowing a PLE Exemption if the SFA has a positive fund balance as of January 31, 2018. Complete the PLE Exemption form if you have a positive fund balance and do not want to raise paid lunch prices. Print a copy of the emailed form for your records.

#### Technical Assistance/Compliance Reminders

##### Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](#). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](#).
- The SFA currently has a written unpaid meal charge policy in place.
- Technical assistance was provided on-site regarding that the Unpaid Meal Charge Policy must be clearly communicated to all households/staff and upheld in order to prevent a deficit to Fund 50.

##### Allowable Costs

- 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, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found on the Financial Management webpage. A best practice is to continue to collect on the unpaid meal

charges as long as you are able to and the student is still enrolled. If unable to collect, then a transfer is required to Fund 50 from Fund 10 or another non-federal fund.

- Per question 15 of the Financial Q&A, student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50. Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50.

## **Revenue from Nonprogram Foods**

### **Technical Assistance/Compliance Reminders**

- Nonprogram foods sold at the school district include: Adult Meals and Extra Milk.
- It's important to know whether you are covering your costs for all nonprogram foods and make sure you are not using federal reimbursement to subsidize any nonprogram foods or beverages.
- Continue to review your expenses and revenues for nonprogram foods to ensure the revenues exceed expenses.

## **4. GENERAL PROGRAM COMPLIANCE**

### **Civil Rights**

#### **Commendations**

Civil Rights training was completed for all food service staff involved with the School Nutrition Programs.

#### **Technical Assistance/Compliance Reminders**

##### PI 1441 Form

- Include all staff involved with the National School Lunch Program on the PI 1441 form.

### **Local Wellness Policy**

#### **Commendations**

The SFA has a Wellness Policy in place. Thank you for having a wellness policy on file and working to assure students are on the path for a healthy lifestyle.

#### **Technical Assistance: Local 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. 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).

**SFA is required to complete an assessment of the LWP:**

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA’s policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team’s Wellness Policy webpage](#). A sample model wellness policy is available at the [USDA Wellness Policy webpage](#). Public School Districts that participated in the Wisconsin Obesity Prevention’s Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school’s report is available at the [Wisconsin Health Atlas webpage](#). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

**SFA required to inform the public of the results of the most recent assessment:**

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA’s LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

DPI’s Team Nutrition has developed a toolkit and other resources to assist schools with building their [wellness policy](#). Schools can chose from several standardized language options in the toolkit that comply with USDA’s regulations and tailor it to their school needs.

- **Finding #1:** The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

**Corrective Action Required:** Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](#). **Submit a statement via email of when you plan to have the policy updated.** The [Wellness Policy Builder](#) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy.

## Smart Snacks

### Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption.

The Wisconsin Department of Public Instruction 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 this may not occur in the meal service area during meal service times.

There is no required template that must be used to track fundraisers or products sold that are subject to Smart Snacks standards. However, tracking tool templates are available on the [Smart Snacks page](#) of our website and may be helpful in tracking this information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). Locations where exempt fundraisers occur, must be documented to ensure compliance with the regulation.

The [Smart Snacks in a Nutshell](#) document provides a great overview and summary of the general standards, nutrient standards and allowable beverages for your reference (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).

## Professional Standards

### Comments/Commendations

The Authorized Representative and Food Service Manager share the majority of the program duties. The Authorized Representative is doing a good job making sure required training hours are completed throughout the school year. Both the Authorized Representative and the Food Service Manager attend SNSDC trainings to stay up to date on the regulations. Nice work!

### Technical Assistance

#### Training Requirements

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

### Annual Training Requirements for All Staff

- Directors: 12 hours
- 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

- ❑ **Finding #1:** Trainings are being tracked for all staff members involved with the School Nutrition Programs. However, the training logs that are being kept are missing some information. Training logs should have the employees' date of hire, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff).

**Corrective Action Needed:** Update the tracking tools to include this information. You may use the [DPI Tracking Tool](#) or create your own to include all information. **Submit a copy of the updated tracking tool.**

### **Food Safety and Storage**

#### Commendations

- It was evident during meal observation that staff members are well-trained on food safety procedures and effectively implement the food safety plan.
- A site-specific food safety plan was available at the reviewed school. It was clear that the plans are reviewed and updated regularly.
- Temperature records were well-kept, detailed, and available at the reviewed site.

### Findings and Corrective Action

- ❑ **Finding #1:** The process 1, 2, and 3 foods are not listed within the Food Safety Manual.

**Corrective Action Needed:** Complete a list of all process 1, 2, and 3 foods that are served on the menu throughout the entire school year. Submit a copy of these lists. Add the lists to the Food Safety Manual.

- ❑ **Finding #2:** The employee reporting agreement was not completed.

**Corrective Action Needed:** Complete the employee reporting agreement and submit a copy of it.

### **Buy American**

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

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy

American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the [SNT Procurement webpage](http://dpi.wi.gov/school-nutrition/procurement/buy-american) (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

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 notes 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. The following products were found without a clear country of origin indicated on the product or product packaging:

- Crisco
- Powdered sugar
- 'House recipe' mustard
- Ranch dressing

- Parsley
- Dark chili powder
- Sysco canned corn
- Baked beans
- Frozen Brussels sprouts

### **Findings and Corrective Action Needed**

❑ **Finding #1: While reviewing product storage for compliance with the Buy American provision, mandarin oranges from China were found. Additionally, it was unclear if the Buy American provision was properly addressed in the procurement process.**

**Corrective Action Needed:** Submit [documentation](#) for an exception to the Buy American provision for the mandarin oranges or documentation for domestic products that will be used in their place (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>). Additionally, please contact Alex Zitske ([alex.zitske@dpi.wi.gov](mailto:alex.zitske@dpi.wi.gov) or 608-267-9822) to discuss Buy American further and ensure that procurement, monitoring and tracking are being done properly. Submit a written statement describing the information gathered during this contact and plans for ensuring compliance with the Buy American provision going forward (such as when purchasing produce from the local grocery store).

### **Reporting and Recordkeeping**

#### **Commendations/Technical Assistance/Compliance Reminders**

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All documents pertaining to the School Nutrition Programs must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain. In other words, keep all documents for 3 years plus the current school year.

### **Summer Food Service Program (SFSP) Outreach**

#### **Summer Meals**

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round.

USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](#) website (<http://www.fns.usda.gov/summerfoodrocks>)

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

Feel free to contact Amy Kolano with any questions regarding the Summer Food Service Program. Her phone number is (608) 266-7124. Her email address is [amy.kolano@dpi.wi.gov](mailto:amy.kolano@dpi.wi.gov).

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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



*With School Nutrition Programs!*