
USDA Child Nutrition Programs

Administrative Review Summary Report

School Food Authority: St John Ev. Lutheran

Agency Code: 287530

School(s) Reviewed: St John Ev. Lutheran

Review Date(s): December 18-19, 2017

Date of Exit Conference: Dec 19, 2017

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

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

General Program Reminders/Updates:

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

flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St John Ev. Lutheran 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

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.

Household Size Box

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

Incomplete Applications

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

Limited English Proficiency (LEP)

- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ **Finding:** The finding was that one application that was required to be verified was found to be incomplete when the initial determination was made. This error is recorded on the SFA 1.

Corrective Action Needed: Please contact family to confirm the missing information. Corrected on-site, no further action is required.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

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

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

Findings and Corrective Action Needed: Verification

❑ **Finding:** The non-discrimination statement within the “We Must Check” and “We Have Checked” letters sent to households did not have the correct format and font size required by USDA.

Corrective Action Needed: Provide DPI with updated letters that lists the most current nondiscrimination statement in the correct format and font size.

❑ **Finding:** Verification was not completed by November 15, 2017. One application was selected for Verification. The “We Must Check” letter sent to the household requested information from families by a response date of November 10, 2017. It was found that there was without any documentation of the required follow up notification as it appears there was no response by November 10, 2017. The “We Have Checked” letter was sent on December 11, 2017, although benefits ended on December 4, 2017.

Corrective Action Needed: Please review the verification process. Guidance for this can be found on the DPI website such as webcasts and the eligibility manual. Please submit a detailed summary on how the verification process will be handled in the future when reaching out to households for verification including how the SFA will follow up if there is no response from households.

❑ **Finding:** The Confirming Official’s (CO) understanding of his/her responsibilities needs to be reviewed for a clearer understanding of the role of the confirming official.

Corrective Action Needed: To ensure the CO understands his/her position, please have the CO review DPI's [eligibility webpages](#), specifically, the [Eligibility Manual](#) and submit a statement explaining the CO's official duties.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

Edit Checks

- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission. The [edit check](#) can be found on the DPI website, under the Claiming heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming>). **Technical assistance** was required.

Findings and Corrective Action Needed: Meal Counting and Claiming

Finding: The finding was that an edit check has not been completed for each month that a claim is submitted. The school does have a process in place for claiming correctly, but it needs to meet the requirement of having an edit check completed for each claim submitted.

Corrective Action Needed: Please complete an edit check for one month of claiming and submit to reviewer.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you for the staff at St. John's Evangelical Lutheran School for your warm welcome and cooperation during the Administrative Review. You have a great team and it was encouraging to see the supportive work environment. In regards to your lunch service, we enjoyed seeing the veggie tray as additional vegetables offered to the students. It was presented beautifully and it was great to see students selecting a variety of vegetables!

Comments/Technical Assistance/Compliance Reminders

Crediting Documentation

Food used in the School Meal Programs must have proper crediting documentation available to be able to determine if meal pattern requirements were being met. Sources of this information are the USDA *Food Buying Guide*, Child Nutrition (CN) labels, product formulation statements (PFS) and product nutrition facts labels. You may organize the information however you choose, but it is recommended to have a system for gathering and maintaining this information. DPI recommends 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. You may cut, copy or take a picture of CN labels and/or nutritional facts labels. You may also need to contact the manufacturer directly for a PFS. Keep all documentation on file for easy reference.

More information about crediting documentation can be found on the [Meal Pattern Components](#) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>).

Production Records

Production records are required to document that food served to students is meeting the meal pattern requirements. Continue to work with all staff members to record the following for all menu items, including fruits, vegetables and condiments: portion sizes, amount prepared, planned number of servings, leftovers, purchase units, and vegetable subgroups. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Technical assistance was given on the purpose for and importance of complete production records. It may help to imagine that if you were away and someone with no knowledge of school meals programs were required to prepare lunch for your students. Would your production records contain all the information they would need to run a successful lunch service?

In addition, we strongly encourage you to switch to a new production record template that contains space for all required information, as discussed above. DPI has [production record templates](#) that you may use and they can be found on our website. The [Lunch \(1 grade group\) production record template](#) is recommended. (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). For your reference, refer to the [Production Record Requirement list](#) found on our [Production Records](#) webpage for what is required on your production records (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Menu Planning

It was noted that for the week of review the beans/peas/legumes subgroup was not offered, there was a daily grain shortage (Fritos), and there was a weekly Meat/Meat Alternative shortage (sausage links). Menu planning worksheets are very helpful tools for ensuring meal pattern requirements are met at lunch (particularly vegetable subgroup requirements). It is strongly encouraged to use a [K-8 School \(Lunch\)](#) worksheet to help you plan your lunch menus. These worksheets can be found electronically on the [Menu Planning](#) webpage, under the Menu Planning Tools heading (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Standardized Recipes

Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient must have a standardized recipe. Recipes noted during the Administrative Review requiring a standardized recipe include the pork taco filling for the walking taco, pancakes, and Salisbury steak and gravy. A standardized recipe is one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes.

This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Continue to 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](#) 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?](#), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>). If you need additional assistance or have any questions, please contact a [contact a Public Health Nutritionist](#) for assistance (<https://dpi.wi.gov/school-nutrition/directory>).

Whole Grain-Rich

As a reminder, 100% of your offerings for lunch must be whole grain-rich (WGR). This includes processed entrée items as well as additional grains like pasta and rice. A few items for lunch were not WGR (e.g., spaghetti noodles and Fritos chips) . Technical assistance was given on reviewing the ingredient list on the nutrition facts panel and looking specifically for a whole grain ingredient listed as the first ingredient (or the first ingredient after water). Please review each grain item offered to ensure that it meets the criteria. Additional information on WGR, including how to determine if a product is WGR, can be found in the [USDA Whole Grain Resource](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).

Training

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 verification, free/reduced applications, menu planning, production records, and record keeping requirements. Information on summer classes will be sent to School Food Authorities in late spring and is also available on the [DPI training](https://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed.

Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action. Thank you.

Finding #1: Incomplete production records for week of review and on-site observation.

Consider using the DPI production record template, which has space for all required information.

Corrective Action Required: Submit one week, of your choosing, of completed production records. These production records must contain all of the required information as noted above.

Finding #2: Daily minimum vegetable shortage on 11/17/17 for the week of review. Only 1/2c was offered. The required minimum daily amount to offer students is 3/4 cup.

Note: This finding was a repeat violation from the previous Administrative Review for school year 2013-2014. Previously, during the week of review (February 3-7, 2014), the minimum daily vegetable requirement was not met. This year, the same finding was found. During the week of review, November 13-17, 2017, there was not enough vegetable offered to students to meet the daily vegetable requirement of 3/4 cup.

Fiscal action is required in this situation due to the fact that DPI has provided previous technical assistance and corrective action, and meal pattern requirements are still not being met. To correct this, you may choose to offer 3/4 cup of vegetable instead of 1/2 cup when there is only one menued vegetable. Alternatively you could offer additional vegetable options to students.

Correction Action Required:

Submit a statement that explains how you will fix your menu on 11/17/17 for the week of review and for future meals when only one vegetable choice is offered. The minimum daily vegetable requirement is 3/4 cup when only one vegetable choice is offered.

Finding #3: The beans/peas/legumes vegetable subgroup was not offered for the week of review.

Corrective Action Required: Submit a written statement indicating how you will offer the beans/peas/legumes subgroup in the week of review (November 13-17) and in future weeks. 1/2 cup is required to be offered every week.

In addition, please submit one week of completed menu planning worksheets showing the beans/peas/legumes vegetable subgroup is offered. Note: submitting the menu planning worksheets will also satisfy part of the corrective action requirements for finding #4 and finding #5 below.

Finding #4: Weekly Meat/Meat Alternate shortage during the week of review.

It was noted that the two sausage links that were served on Monday 11/13/17 were incorrectly credited as 2 oz equivalents (oz eq). Instead two sausage links only credit as 1.25 oz eq of meat/meat alternate. You may choose to offer an additional sausage link (serve three links) to credit 2 oz eq meat/meat alternate. This would solve the weekly meat/meat alternate shortage.

Corrective Action Required: Submit a written statement indicating your plans to fix the weekly meat/meat alternate shortage for the week of review (November 13-17) and in future weeks.

Finding #5: Daily grain shortage during the week of review. Fritos offered on Thursday 11/16/17 only credit as 0.75 oz eq (minimum daily grain requirement is 1 oz eq).

You may choose to offer another grain option to satisfy the 1 oz eq requirement or increase the serving size to credit as 1 oz eq.

Corrective Action Required: Submit a written statement indicating your plans to fix the daily grain shortage for the week of review (November 13-17) and in future weeks.

Finding #6: Whole grain rich requirement not met for week of review (spaghetti noodles and Fritos chips).

Corrective Action Required: Provide a written statement on your plans to discontinue the use of the current non-whole grain-rich products and switch to whole grain-rich alternatives. Include CN labels, product formulations statements and/or nutrition facts labels for the replacements products.

Finding #7: Standardized recipes missing for walking taco filling, pancakes and Salisbury steak and gravy.

Corrective Action Required: Submit standardized recipes for the walking taco filling, pancakes and Salisbury steak and gravy.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account Commendations/Comments/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”](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).
- For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance:](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding:** The finding was that there was not a unpaid meal balance policy or standard practice available in a written format which is required to be distributed to families and food service staff at the beginning of the school year.

Corrective Action Needed: Please submit a statement of a timeline of when a written procedure or policy will be developed to meet this requirement. Please then make this information available to families. Additional guidance can be found on the DPI [financial management](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)

Revenue from Nonprogram Foods Commendations/Comments/Technical Assistance/Compliance Reminders

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist you in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).
- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.

Resources

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

Findings and Corrective Action Needed: Revenue From Nonprogram Foods

□ **Finding:** The finding is that adult staff meals are being charged at 2.85, not the required amount of 3.50 that is listed in the contract for this current school year. (The school did receive a donation which was intended for each staff person to receive a certain amount of meals.) Please submit a statement of a timeline on when this requirement of charging 3.50 will be implemented for staff meals.

Corrective Action Needed: Please submit a statement of a timeline on when this requirement of charging 3.50 will be implemented for staff meals.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

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

And Justice for All Poster

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

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. This training needs to be recorded on a training roster.
Technical assistance was provided.

Civil Rights Self-Compliance Form

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

Processes for complaints

- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right

to file. Please refer to the [USDA Program Discrimination Complain 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)

Technical assistance was provided to SFA to have a plan in place for hoe to handle a compliant.

Findings and Corrective Action Needed: Civil Rights

Finding: The finding is that the non-discrimination statement is not listed on the printed menu or the menu posted on the website.

Corrective Action Needed: Please submit a copy of a menu, which includes the non-discrimination statement that will be used for posting in the cafeteria and on the website.

Finding: The finding was civil rights training has not been documented.

Corrective Action Needed: Please provide a copy of a roster of a training for civil rights for all food service and non-food service staff members involved in the food service program.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

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

Content of the Wellness Policy

At a minimum the wellness policy must include:

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

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)

- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Local Wellness Policy

❑ Finding: The wellness policy is not up dated to reflect the current regulations as required by USDA.

Corrective Action Needed: Please provide a statement, which includes timeline for updating your policy to become compliant with the final rule. The [Local Wellness Policy Checklist](#) can assist with sample language. Please include in the statement who will be involved in the wellness committee and when the wellness committee will meet to update the policy. Additionally, include how the SFA will make the wellness policy available to the public and explain how the SFA will notify the public of the wellness policy. Finally include a statement of understanding that there is a requirement to monitor and report to the public on the results of how the wellness policy is working in your SFA.

Smart Snacks

Commendations/Comments/Technical Assistance/Compliance Reminders

Fundraisers

Even though St. John’s Evangelical Lutheran School does not hold any fundraisers that sell foods to students during the school day. The following information is included in case this were to change.

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization, per school, per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but this may not occur in the meal service area during meal service times.

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their

Local School Wellness Policy if they are consistent with federal requirements. More information on healthy fundraisers can be found on our [Smart Snacks](#) webpage.

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](#) are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

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

Annual Training Requirements for All Staff

Directors: 12 hours

Managers: 10 hours

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

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

If hired January 1 or later, only half of the training hours are required during the first school year of employment. **Technical assistance** was required regarding tracking of training hours.

Findings and Corrective Action Needed: Professional Standards

❑ **Finding:** The finding was that there was no current documentation to support required training hours for professional standards for food service staff. There was no tracking tool available of training hours for food service staff and non-food service staff.

Corrective Action Needed: Please submit a copy of a training tool the SFA will use to keep track of hours for food service staff and non-food service/volunteers staff. Please include any current trainings and supply a statement of planned trainings for food service and non-food service staff/volunteers.

Food Safety and Buy American Commendations/Comments/Technical Assistance/Compliance Reminders

[A Flash of Food Safety](http://www.fns.usda.gov/ofs/food-safety-flashes) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes).

Visit the [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Temperatures

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

Food Safety Plans

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- 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. **Technical assistance** was required.

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.

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

Findings and Corrective Action Needed: Food Safety and Buy American

❑ Finding: Most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action Needed: Post the most recent food safety inspection report in location visible to public. Completed on-site so **no further** action required.

❑ Finding: Food Employee Reporting Agreements are not signed and on file.

Corrective Action Needed: Food service staff need to complete this agreement and it must be kept on file and updated as needed. Corrected on-site, **no further action** required.

❑ Finding: Incomplete Processes 1, 2, and 3 within the most recent Food Safety Plan.

Corrective Action Needed: Categorize all menu items on chart for Menu Items Categorized by Process 1, 2, or 3. Submit a copy of an updated HACCP 1,2, and 3 sheet.

❑ Finding: Undocumented cooling method of menu items in process 3.

Corrective Action Needed: Submit a statement regarding the development and implementation of cooling studies for Process 3 menu items. Utilize a cooling log to conduct these cooling studies. A cooling log template was provided on site.

❑ Finding: Dishwasher temperatures are not being recorded daily.

Corrective Action Needed: Currently, dishwasher temperatures are being recorded on a monthly basis, however, SFAs are required to sanitize equipment and utensils before each use. Submit, at a minimum, a week of daily dishwasher temperature records to reviewer by the corrective action deadline.

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

- Pineapple from Philippines
- Ripe olives from Spain

Corrective Action Needed: Please complete a non-compliant form for each of these products and submit back to reviewer.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

All free and reduced price applications, including applications from households with denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

Summer Food Service Program (SFSP)

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at your school, 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](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

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>).

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>).

