

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

**School Food Authority: St. Mark's Lutheran
School**

Review Date(s): March 27-29, 2018

Date of Exit Conference: March 29, 2018

Agency Code: 287538

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, meal benefit determination process, professional standards, 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, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Mark's Lutheran School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All staff were eager to learn and 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.

The DPI review team is confident that the employees at St. Mark's Lutheran School will continue to improve their knowledge and operation of child nutrition programs. Thank you!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Technical Assistance:

- It is required the Determining Official sign and date all approved and denied applications. The Confirming and Verifying Officials do not need to sign and date applications unless the applications are selected for the verification process or are verified for cause.
- The total income on a free and reduced school meal price household application should only be annualized if the individual incomes are reported at different frequencies (bi-weekly, monthly, weekly, twice per month, or yearly). If individual incomes are reported at the same frequency, the incomes are simply added and reported as the total income.
- There was a denied application that was missing the household number and the social security number. This application was for a student that no longer attended the SFA, and therefore, the error was not recorded. However, in such cases, the SFA is required to contact households for this information if it is missing on an application. Otherwise, the application is considered "incomplete".
- When a student is found via Direct Certification or an application, the date for when he or she qualifies for free or reduced price meals is the exact date that must be listed on the Benefit Issuance (BI) list. For example, if a student is approved before the beginning of the school year, record that exact date, not the first day of school. If a student is approved at the end of the day on a Friday, do not list the following Monday as the approval date on the BI list.

Compliance Reminders:

- When a benefit eligibility status increases, the change must take place within three days. When a benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding #1: There was one application where the student within the household was determined as eligible to receive reduced meals, when they were actually eligible for free meals.

Corrective Action Needed: Please send a letter of eligibility change to the household on March 27, 2018. Send a copy of the letter and the updated benefit issuance list to the consultant assigned to your review. The benefit should be changed within three days of the letter being sent. **Letter provided onsite.**

Verification

Commendations:

Thank you for completing Verification by November 15 and selecting from the October 1 application pool.

Technical Assistance:

- “Error-prone applications” are those with reported income within \$100 monthly or \$1,200 yearly of the free and reduced price income eligibility levels.

Compliance Reminders:

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family.
- The Determining and Verifying Officials may be the same person, but the Determining Official cannot be the Confirming Official.
- 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.
- An SFA may be contacted by the state agency and is required to use Standard Sampling method. This means, of the applications selected in the previous school year, 20% or greater had a non-response rate. If not contacted by the state agency, there are three verification processes from which an SFA may choose:
 - Standard Sampling Method: 3% of all error-prone applications are selected for verification
 - Alternate One: 3% of all application are selected for verification
 - Alternate Two: 1% of error-prone applications and 0.5% of all categorically eligible applications are selected for verification

Findings and Corrective Action Needed: Verification

Finding #2: The staff were not familiar with the all requirements of the verification process. The Verification Collection Report (VCR) reported an incorrect number of error-prone applications, and the application selected for verification was not error-prone despite the Standard Sampling Method being selected.

Corrective Action Needed: Please complete the DPI Verification webcast and quiz, and then send it to the consultant assigned to your review.

Resources:

- Please reference the [Verification forms](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx) on DPI's Verification webpages for all documentation needed for the verification process (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx).
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Meal Counting and Claiming

Commendations:

The SFA does a great job completing monthly edit checks. Thank you!

Technical Assistance:

- Currently, the point of service (POS) at breakfast is both the POS employee and cafeteria monitor. The POS employee must pay full attention to the students coming through the line so as not to under-claim meals at breakfast.
 - Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
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2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff of St. Mark's Lutheran School for their time spent preparing for and participating in this Administrative Review. Thank you to the Food Service Director for submitting documentation and answering questions prior to the onsite review. The staff at St. Mark's Lutheran School has shown their dedication to the program by attending DPI summer training classes and by gathering student feedback on the menu items. Your multiple forms of signage are a great way to communicate what students may take as part of their reimbursable meal. Thank you for all that you do for the students of St. Mark's Lutheran School!

Comments/Technical Assistance/Compliance RemindersTraining

Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [training webpage](https://dpi.wi.gov/school-nutrition/training) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (dpi.wi.gov/school-nutrition/directory).

Items at Breakfast

- It is up to the menu planner to determine in advance how the foods offered at breakfast will count as items. This includes whether items crediting as 2.0 ounce equivalents (oz. eq.) count as one or two food items. For example, the hardboiled egg served on the day of observation was 2.0 oz. eq., so it could be counted as either one or two food items.
- A few of the foods offered on the breakfast menu credit as less than 1.0 oz. eq. of grain. These foods must be bundled with other items so at least 1.0 oz. eq. of grain is offered each day to meet the daily minimum requirement for grain, and so these items can be counted as an item for the breakfast meal pattern. An item at breakfast is defined as 1.0 oz. eq. grain, 1.0 oz. eq. meat, ½ cup of fruit

and/or vegetable, or 1 cup of milk. Under Offer Versus Serve, four food items must be offered at breakfast, and students must select at least three food items, including $\frac{1}{2}$ cup fruit and/or vegetable to have a reimbursable meal. The following items each credit as less than 1.0 oz. eq. grain: Millville brand chewy granola bars and $\frac{3}{4}$ cup cereal varieties offered.

- Additionally, during breakfast observation, a few students selected 4 fluid ounces (fl. oz.) of milk in a glass, instead of the full 1 cup (8 fl. oz.) milk cartons. The 4 fl. oz. milk cannot be counted as an item at breakfast, so students would need to select an additional three food items for a reimbursable meal. One non-reimbursable meal was observed at breakfast, which contained 4 fl. oz. of milk, $\frac{3}{4}$ cup cereal (crediting as 0.75 oz. eq. grain), yogurt, and an apple. Adjusting serving sizes to meet these minimum requirements is encouraged to reduce confusion over what is needed for a reimbursable meal.

Offer versus Serve (OVS) and the Planned Menu

- The planned menu must be in compliance with all daily and weekly meal pattern requirements. OVS occurs only during meal service. Therefore, the printed menu, recipes, portion sizes on production records, options when counts are taken, etc., should reflect the menu and portion sizes as planned.
- As long as the quantities of the foods offered meet the meal pattern requirements, a younger student may take a smaller portion of some items. However, in order to credit toward the meal pattern and count as a full component or item under OVS, the amount a student selects must meet the daily minimum requirement for their age/grade group. Consider the following examples:
 - Four French toast sticks were planned for lunch, which credit as 2 oz. eq. grain. A student may select only two French toast sticks (crediting as 1 oz. eq. grain), plus two other full components, with one being at least $\frac{1}{2}$ cup fruit and/or vegetable, and still have a reimbursable meal.
 - Three sausage links were planned for lunch, which credit as 1.25 oz. eq. meat/meat alternate. If a student only selects one link, it would credit as 0.25 oz. eq. meat/meat alternate. If no other meat/meat alternate items were taken, the meat/meat alternate from the one sausage link would not count as a component because it does not meet the daily minimum requirement of 1 oz. eq. for this age/grade group. Therefore, this student would need to select at least three additional components, one of which being at least $\frac{1}{2}$ cup fruit and/or vegetable.
- Two non-reimbursable meals were observed during lunch service. Both meals contained less than the full planned serving of at least one component. One student selected three French toast sticks, $\frac{1}{2}$ cup of strawberries, 1 sausage link, and approximately $\frac{1}{4}$ cup of potato rounds. This meal contained two full components (grain and $\frac{1}{2}$ cup fruit to satisfy the OVS requirement), but did not contain a third full component. The second student selected four French toast sticks, $\frac{1}{2}$ cup of strawberries, and two sausage links. This meal contained two full components (grain and $\frac{1}{2}$ cup fruit to satisfy the OVS requirement), but did not contain a third full component as two sausage links credited as 0.75 oz. eq. meat/meat alternate.
- If students are allowed to continue to take partial portion of the planned serving size, it is encouraged to determine the minimum creditable amounts prior to service. Additional OVS training for all staff serving meals would also be strongly encouraged in order to accurately determine if meals containing partial servings could be claimed as reimbursable meals.

Crediting Documentation

- Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). 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. Additionally, remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- Grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) of the USDA *Food Buying Guide* (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). If a product is not on Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the *grams of creditable grain* in the product. Divide this number by 16 grams per ounce equivalent to calculate the grain contribution for that product.

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

- All items included on production records need to have a planned serving size. A few items on the production records submitted for the week of review were missing this information. This piece of information is essential for staff who are preparing and serving meals, as well as for crediting items toward the meal pattern. Additionally, planned portion sizes should be one amount as all meals are being planned using the K-8 meal pattern.
- The production records should include actual planned number of servings, which should be forecasted based on historical data. The total planned quantity (in purchase units) should reflect the amount needed of the product in order to prepare the number of planned servings in the planned serving size.
- 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. This also applies to the crediting information recorded on the production records.
- Be specific on production records about the identity, brand, and description of the items served. List the specific type of granola bar or cereal offered, rather than just listing “cereal” or “granola bar” as these do not indicate exactly what was served. There is a wide variation in formulation of the many products that fall into these categories. Fruit sizes (e.g. case count) should also be recorded.
- A list of production record requirements (“Must Haves and Nice to Haves”) and sample production record templates can be found 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>).

Standardized Recipes

- Recipes should be updated to reflect current practices and products used at this site. Guidance on what a standardized recipe should include can be found on our [Recipe Resources and Tools](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).
- A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made.
- Standardized recipes are required for all menu items that have more than one ingredient. This would include items such as the bagels with cream cheese and the toast with butter and cinnamon offered at breakfast. Standardized recipes will help to ensure that consistent quantities are being used each time, which is essential to serving the menu as it is planned.

Milk Varieties

A variety of milk, at least two allowable milk types, is required to be offered daily at lunch and breakfast. Cartons of nonfat (skim) chocolate milk were available in a milk barrel at breakfast during the on-site review. Low-fat unflavored milk was available in a pitcher on the serving line for students to pour onto their cereal or to request by the glass for drinking. When using 8 fl. oz. glasses to serve 8 fl. oz. of milk, there is an increased likelihood to under-serve students, while also increasing the chances of spilling milk. Since low-fat unflavored milk is offered in cartons at lunch, consider adding this variety to the milk barrels for breakfast as well.

Condiments

- Condiments can be significant sources of calories, saturated fat, and sodium in a meal. Consider procuring lower fat and reduced sodium varieties of items such as salad dressing and mayonnaise. The calories, saturated fat, and sodium in some of the original versions of condiments may greatly contribute toward the dietary specifications, even when used in small amounts.
- Your signage telling students that they were able to take one pancake syrup cup was great! Consider placing signage such as “One squeeze, please!” on self-serve squirt bottles and near the self-serve ketchup pump.

Field Trips

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way for collecting meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

Breakfast Menu

The current breakfast menu is included as a footnote on the lunch menu and lists the daily breakfast options. The hot entree offered is listed on the lunch menu on the respective day in italics, but there is no reference to it being a breakfast offering. Consider bringing more attention to your breakfast options by creating a separate menu or by rearranging the current menu.

Breakfast Participation

- It is great to see that St. Mark's Lutheran School offers the School Breakfast Program. However, the school uses the traditional breakfast service model and their participation rates could be higher. St. Mark's Lutheran School and staff may want to consider a change in breakfast model to increase participation.
- Breakfast in the classroom is associated with the highest participation rates, which can be as high as 98 percent of the school's enrollment, and works best in elementary schools. Other service methods, such as Grab 'n Go and breakfast after first period, correlate with increases as much as 15-40 percent of current participation. If breakfast is offered in a convenient way for students, they will participate in the program. Perhaps offering Grab 'N Go options in hallways for 1st period or as a later morning option may capture more students. Greater participation equates to more students being ready to learn, as well as higher levels of government reimbursement, which results in more revenue for the school.

Refer to the [Serving Up a Successful School Breakfast Program](#) guide for an in-depth look at the various School Breakfast service models to determine which one(s) may work in your schools. Find additional information on breakfast, including meal pattern and menu planning tools, on the [School Breakfast Program](#) webpage (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>). Please contact our School Breakfast Specialists, Tracy Huffman, MS, RDN, CD, tracy.huffman@dpi.wi.gov and Hannah Snider, MPH, RDN, CD, hannah.snider@dpi.wi.gov for additional guidance.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding #3:** The lunch planned for Friday of the week of review was missing the grain component. The school was closed this day due to weather, so the meal was credited based on the planned production record. The planned lunch consisted of fish sticks, French fries, veggie cups, mixed fruit, pineapple, and milk. The CN label submitted for the fish sticks showed meat/meat alternate crediting, but not grain crediting. After a discussion with staff, it was determined that this was a new product and Friday of the review period was the first day this specific product was to be offered on the menu. Once the crediting was noticed, a slice of cheese bread was planned for the next time this meal was served.

Based upon review of additional production records from the review period, this does not appear to be a systemic issue. The production record for the next date the fish sticks appeared on the menu showed the above correction was made.

As no meals were served this day, there are no meals to re-claim for this missing component.

Corrective Action Needed: Submit a written statement explaining your plan to ensure the planned menu and the products served provide creditable foods from the required components at each meal.

- ❑ **Finding #4:** An insufficient amount of grains was offered at lunch for the week of review. Over the week 6 oz. eq. of grains were offered, which was short of the 8 oz. eq. weekly requirement for the

K-8 age/grade group. Please note that the amount of grains offered during the week of review would have been short of the weekly requirement even with the cheese bread added in on Friday.

Repeat violations of a weekly grain shortage during subsequent Administrative Reviews may result in fiscal action.

Corrective Action Needed: Submit a written statement explaining how the weekly grain requirement for lunch will be met for the week of review and all the other weeks of your cycle menu. Please include specific planned serving sizes and product documentation for any grain items added to the menu.

- ❑ **Finding #5:** An insufficient quantity of vegetables was offered on Tuesday of the week of review. A total of $\frac{1}{2}$ cup of broccoli was offered, which was short of the requirement to offer at least $\frac{3}{4}$ cup vegetables daily for the K-8 grade group.

Fiscal action is required for select repeat violations found during an Administrative Review (AR). Because a daily vegetable insufficiency was found during the last AR as well as the current AR, fiscal action will be applied. There will be a re-claim for meals on the day that the insufficient vegetable quantity was offered during the week of review. The following finding was documented from the School Year (SY) 2013-2014 Administrative Review, which is a repeat finding during the current AR:

- *Insufficient vegetables were offered with the meal served on Friday of the review week.*

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

Corrective Action Needed: Submit a written statement explaining how the daily vegetable requirement to offer at least $\frac{3}{4}$ cup of vegetable at lunch will be met for this day. Please also explain your plan to ensure that at least the minimum daily vegetable requirement is offered to students each day. Please include specific serving sizes and product documentation if applicable.

- ❑ **Finding #6:** The production records submitted for the week of review were not filled out completely, based on DPI's [Production Record Requirements](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) ("Must Haves and Nice to Haves") (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Corrective Action Needed: Submit one week of lunch production records showing all the required information filled in. Please reference the above technical assistance and provided links for guidance.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations:

Indirect and unallowable costs were not observed during the onsite review, and the Paid Lunch Equity (PLE) tool was completed correctly. Thank you!

Technical Assistance:

- Revenues and expenditures of non-program foods must be reported on the Annual Financial Report (AFR).
- The Unpaid Meal Charge Policy was drafted in 2016, but was not sent out to households. A new policy is planned for this summer and must be sent out to all households before the beginning of the school year 18-19.

Compliance Reminders:

Unpaid Meal Charge Policy:

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meals programs to have a written and clearly communicated policy that addresses unpaid meal charges.

Annual Financial Report (AFR):

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance on June 30 can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of three-month operating expenses, as this is considered an "Excess Cash Balance". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three-month average of operating expenses to remain in compliance with a non-profit status.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ Finding #7: The AFR for school year 16-17 had inconsistent beginning and ending fund balances when referencing the 15-16 and 17-18 school years. When reviewing the SFA's account ledgers from the last three school years, all beginning and ending fund balances matched accordingly, but the AFR did not reflect these numbers.

Corrective Action Needed: Please re-submit the corrected AFR for school year 16-17 to Jacque Jordee. She may be contacted via email at jaqueline.jordee@dpi.wi.gov, or by phone at (608) 267-9134.

Resources:

- The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).
- Additional resources for the AFR are located on DPI's [Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Revenue from Non-program Foods

The non-program foods served at the SFA are milks only and adult meals. Therefore, the non-program foods revenue tool is not required.

Compliance Reminders:

- All costs associated with non-program foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sales of those foods.
 - Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus, non-program foods may never run in the negative unless non-federal funds are transferred into the food service account to cover the deficit.
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4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

Thank you for having the most recent food safety inspection and “And Justice For All” poster hung in a publicly-visible area. Additionally, all required employees had their civil rights training completed this school year. Thank you!

Findings and Corrective Action Needed: Civil Rights

Finding #8: The outdated USDA non-discrimination statement is used on meal component signage and MyPlate poster.

Corrective Action Needed: Please update your signage to include the 2015 non-discrimination statement.

Resources:

- The meal component signage with the 2015 non-discrimination statement can be found on DPI’s [Signage Resources webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).
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Local Wellness Policy

Findings and Corrective Action Needed: Local Wellness Policy

Finding #9: The following items are missing for the SFA’s LWP: policy leadership, public involvement, school meals, foods sold outside of school meals programs, food and beverage marketing, nutrition promotion, other school-based strategies for wellness, triennial assessment, and updating/informing the public.

Corrective Action Needed: Please send the revised LWP with the missing components to the consultant assigned to your review.

Resources:

- The [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) includes all required components of the LWP (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf).
 - The [Local Wellness Policy Builder](https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1) may be utilized by the SFA to build a new LWP (https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1).
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Professional Standards

Compliance Reminders:

- The 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.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).

Findings and Corrective Action Needed: Professional Standards

Finding #10: As the food service director (FSD) was hired after July 1, 2015, eight hours of food safety training were a hiring requirement. The training was not completed prior to or within the first 30 days of hire, but the FSD plans to complete the training later this school year.

Corrective Action Needed: Upon registration of the food safety course, please send registration confirmation documents and/or emails to the consultant assigned to your review.

Finding #11: While the review team is confident the FSD has completed the required 12-hour annual training requirements, this information is not documented on a tracking form.

Corrective Action Needed: Please utilize a tracker of your choosing to track the trainings of the FSD and send this tracker along to the consultant assigned to your review.

Water

Commendations:

Thank you for having free, potable water accessible to all students without restriction during meal services!

Food Safety and Storage

Commendations:

The food safety plan onsite contains all Processes 1, 2, and 3 and Foodservice Employee Reporting agreements are completed and kept on file at the SFA. Thank you! The review team would like to commend all foodservice staff for either working toward or already achieving food safety certifications. Outstanding work!

Technical Assistance:

- The kitchen is currently being used by foodservice, the church, and other groups affiliated with the SFA. While the review team is not concerned with how the kitchen is currently maintained, it may be beneficial to create a policy detailing how the kitchen is to be utilized in order to avoid any possible issues involving food or equipment related to the School Meals Programs.
- The SFA should work to ensure there is no over-stocking of the coolers and freezers. Avoid over-ordering to make sure there is adequate space for the rotation of stored food items. If the SFA consistently finds there is no room on the shelves, adjust the delivery dates and frequency and/or utilize carts or milk crates to store the extra items.
- Standard Operating Procedures (SOP)

Compliance Reminders:

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually.

Findings and Corrective Action Needed: Food Safety and Storage

Finding #12: The review team observed boxes stored on the floor of the freezer.

Corrective Action Needed: Corrected onsite.

Finding #13: The SFA uses pitchers of milk to decrease milk waste at breakfast service, however, there is no standard operating procedure (SOP) currently in place detailing these procedures.

Corrective Action Needed: Contact your local sanitarian to draft a SOP for DPI's approval and send the SOP along to the consultant assigned to your review.

Finding #14: A teacher was observed taking milk cartons back to classrooms for students to consume later in the afternoon. The milks were taken by the students as a part of their reimbursable meals, but did not finish or open their milk cartons by the end of the lunch period.

Corrective Action Needed: Contact your local sanitarian for approval of this practice. If approved, draft a SOP and send the SOP along to the consultant assigned to your review. If the practice is not approved by the local sanitarian, please inform the consultant as corrective action.

❑ **Finding #15:** Currently, there is no SOP for field trips.

Corrective Action Needed: Contact your local sanitarian to draft a SOP for DPI's approval and send the SOP along to the consultant assigned to your review.

Buy American

Commendations/Comments/Technical Assistance (TA)/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.
- 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 that 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 Needed: Buy American

Finding #16: The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List:

- Mandarin Oranges - China
- Canned Pineapple - Thailand
- Trio Chicken Gravy Mix – Canada
- Tomatoes - Mexico

Corrective Action Needed: Begin using a Noncompliant Product List for tracking non-domestic products. Submit copies of the completed form for the products listed above. There are four pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product
 - e. Distribution- record the reason the distributor carries the non-domestic product
 - f. Other- explain

You may record additional information if you find it beneficial.

A suggested template is found on the [Buy American](#) webpage under Buy American Noncompliant Product list (word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Smart Snacks

Comments/Technical Assistance/Compliance Reminders:

At the time of the on-site review, a la carte milk was the only food or beverages sold to students at St. Mark’s Lutheran School during the school day. If any food or beverage sales occur in the future, the

items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](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).

Reporting and Recordkeeping

Commendations:

All records are maintained for the required three years plus the current school year. Thank you!

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

Commendations:

The SFA conducts annual SBP outreach at the beginning of the school year. Thank you!

Compliance Reminders:

Summer Meals:

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

Findings and Corrective Action Needed: SBP and SFSP

Finding #17: Although the SFA does not provide summer meals, it must inform eligible families of the availability and location of SFSP meals before the end of the academic school year.

Corrective Action Needed: Utilize any of the resources above and send a list of the facilities you plan to send out to families to the consultant assigned to your review.

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
 - For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: (608) 266.7124; e-mail: amy.kolano@dpi.wi.gov
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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 student success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!