

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

School Food Authority: Peace Lutheran School

Agency Code: 34-7247

School(s) Reviewed: Peace Lutheran School

Review Date(s): 3/21-22/19

Date of Exit Conference: 3/22/19

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, 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).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Peace 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

- Of the 56 students eligible for free or reduced price meals in February, all were approved correctly. Kudos for a job well done!
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

Findings and Corrective Action Needed: Certification and Benefits Issuance

- ❑ **Finding #1:** The applications had income annualized when there was one frequency of payment.
Corrective Action Needed: Please submit a statement that income will not be annualized when there is only one frequency of payment.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- Verification was completed correctly.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals.
- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** Prior to lunch service the milk was beyond the Point of Service (POS) which would render all meals served nonreimbursable, but it was corrected before service allowing most lunch meals to be claimed.
Corrective Action Needed: Please submit a statement that all lunch components will be before the POS.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations/Comments/Technical Assistance/Compliance Reminders

Thank you to the staff of Peace Lutheran School for their time and cooperation during the Administrative Review. A special thanks to the Food Service Director for submitting documentation prior to the on-site review and answering questions. The school nutrition professionals work well together and with the students. We appreciate your hard work and dedication to your National School Lunch Program!

Crediting Foods in School Meals Programs

- The [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) for School Meals Programs contains yield and crediting information for foods with standards of identity, in large part, unprocessed foods (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Foods that do not have standards of identity are not listed in the *USDA Food Buying Guide* and require further documentation, such as a Child Nutrition (CN) label or a product formulation statement (PFS) clearly detailing the ingredients and their creditable quantities, in order to be served in School Meal Programs.
- A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that includes these four things.
- When a CN label is not available for a product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is required that this documentation is printed on company letterhead and signed by an appropriate person.
- If USDA Foods are utilized, [USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) can be used as crediting documentation (<https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets>).
- Grain products can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). If a product is not listed in Exhibit A, you must obtain a signed PFS from the manufacturer that lists the *grams of creditable grain* in the product.
- **If a product does not have a valid CN label, PFS, USDA Foods Product Information Sheet, cannot be found in the *USDA Food Buying Guide* for School Meal Programs, or cannot be credited using Exhibit A, it may not be credited when served as part of the USDA School Meal Programs.**

Vegetable Subgroups

- Production records provided for the week of review demonstrated misidentification of vegetables to their respective subgroups. Mashed potatoes and French fries were listed as an “other” vegetable when they are classified as starchy. Green beans were listed as dark green when they are classified as other. Sauerkraut was listed as red/orange when it is classified as other.
- The vegetable subgroups are categorized based on nutrient composition. Refer to the [Vegetable Subgroups handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) to identify commonly eaten vegetables in each subgroup (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>). The USDA FBG can also be used a resource for identifying a vegetable’s subgroup.

Menu Planning Worksheet

- Peace Lutheran School does not use a cycle menu at this time. The Food Service Director reports creating weekly menus each month. Menus must be planned to meet meal pattern requirements. To assist with this process, a K-8 lunch menu planning worksheet, found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage under the Menu Planning Worksheets heading, can be used (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools). Instructions for menu planning worksheets are also listed.

Dietary Specifications: Second Portions

- When completing the Dietary Specifications Assessment Tool, the Food Service Director reported seconds were provided to students during the last meal service. Please discontinue the practice of offering second servings free of charge to students. Offering second servings complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these

portions must be included in the weekly averages. If students are still hungry, second servings may be sold a la carte.

Dietary Specifications: Extra Menu Items

- Non-creditable cheese sauce was observed in dry storage and a new shipment came in on the day of review. Foods that do not credit toward the meal pattern must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra, non-creditable items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult if extra, non-creditable items, such as potato chips, pudding, gelatin, etc., are frequently served. These foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal.

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

☐ **Finding #1:** Lunch production records did not have the following information filled in or were missing the following categories based on the [Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) (“Must Haves and Nice to Haves”) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>):

- All components that are part of the reimbursable meal must be listed on production records, including corn dogs on Thursday during the week of review and vegetarian substitutions made daily
- Planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb case, 2-96 count case)
- Amount leftover for all items on production record
- Milk usage by each type
- Usage for condiments and any extra menu items
- Number of reimbursable and non-reimbursable meals planned and served; child care, who are not claimed under the National School Lunch Program, are included in the number of student reimbursable meals and they should be included in non-reimbursable meals

While there is no required production record template, there are some examples that may be used on the [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). [Instructions for Completing Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) provide detailed explanations about the required production record categories (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).

Corrective Action Needed: Submit one week of lunch production records after a service week is completed with all of the production record “Must Haves” listed and filled in.

☐ **Finding #2:** Documentation provided for the week of review lacked standardized recipes. The following menu items served or planned to be served during the week of review and on the day of review require standardized recipes:

- Chicken strips with gravy
- Egg noodles
- Mashed potatoes
- Gravy
- Polish Sausage on a bun
- Hot dog on a bun
- Hamburger on a bun
- Old fashioned strawberry shortcake
- Pizza burger

The standardized recipes listed are needed in order to credit some menu items during the week of review.

Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized to reflect the products and practices that are used. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

Corrective Action Needed: Submit standardized recipes for the listed menu items served or planned to be served during the week of review and served on the day of review.

Once the Public Health Nutritionist has all standardized recipes for the week of review listed in Finding #2, the menu can be analyzed for compliance with the National School Lunch Program meal pattern requirements. Until that time, the Administrative Review cannot be closed. Additional errors may require additional corrective action.

❑ **Finding #3:** Documentation provided for the week of review indicated that 100 percent of the grains offered at lunch were not whole grain-rich (WGR). It is required that 100 percent of grains offered at lunch be WGR. Grains that are not WGR cannot be credited toward daily or weekly WGR requirements.

The egg noodles offered on Monday, the dinner roll offered on Tuesday, and the old fashioned strawberry shortcake offered on Friday during the week of review are not WGR. Foods that meet the WGR criteria for the Child Nutrition Programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. USDA has a very thorough [Whole Grain Resource](https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

In dry storage, non-WGR products were observed. **The final rule takes effect School Year 2019-20** (https://www.fns.usda.gov/school-meals/fr-121218). Beginning School Year 2019-2020, only half of the grains served must be whole-grain rich. While 50 percent of all grains are allowed to be non-WGR, this may undermine the progress that was made over the past few years in teaching students to accept WGR products.

Corrective Action Needed: Submit a statement indicating how the WGR requirement at lunch for the week of review will be met and your plan for ensuring the requirement is met for future service weeks for the remainder of the school year. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable, for the products that will be used instead of the egg noodles, dinner roll, and old fashioned strawberry shortcake that were offered during the week of review.

❑ **Finding #4:** Documentation provided for the week of review demonstrated a weekly meat/meat alternate (M/MA) shortage at lunch for K-8 students. There are students that receive a vegetarian meal. Because Peace Lutheran School is accommodating these meals and they cannot have a signed medical statement for this purpose, these meals are required to meet both daily and weekly

requirements. The vegetarian meals served during the week of review only provided 7.00 ounce equivalent (oz eq) M/MA over the week. The K-8 weekly M/MA requirement is 9.00 oz eq. The following vegetarian meals were served:

- Monday: 1.00 oz string cheese with 1 cup egg noodles (1.00 oz eq M/MA)
- Tuesday: 3-0.50 oz slices of cheese with dinner roll (1.50 oz eq M/MA)
- Wednesday: 3-0.50 oz slices of cheese with hot dog bun (1.50 oz eq M/MA)
- Thursday: 3-0.50 oz slices of cheese with hot dog bun (1.50 oz eq M/MA)
- Friday: 3-0.50 oz slices of cheese with hamburger bun (1.50 oz eq M/MA)

Corrective Action Needed: Submit a statement explaining how the K-8 weekly 9.00 oz eq M/MA requirement at lunch during the week of review will be met for the vegetarian meals and your plan for ensuring the minimum M/MA requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

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

❑ **Finding #5:** Documentation provided for the week of review demonstrated a daily fruit shortage at lunch for K-8 students on Thursday, which also led to a weekly fruit shortage. Half of a 113 count orange was served to students as the fruit component for the day. A full 113 count orange credits as 5/8 cup fruit, therefore, half of this orange credits as 1/4 cup, after rounding down to the nearest 1/8 cup.

The K-8 daily fruit requirement is 1/2 cup. Over the course of the week, students were served only 2.25 cups of fruit, due to the daily shortage on Thursday. The K-8 weekly fruit requirement is 2.50 cups.

For assistance with identifying crediting of common fruits and vegetables, the DPI SNT [Half-Cup Crediting of Fruits and Vegetables Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) is a great resource (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>).

Corrective Action Needed: Submit a statement explaining how the K-8 daily 1/2 cup and weekly 2.50 cups fruit requirement at lunch during the week of review will be met and your plan for ensuring the minimum fruit requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

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

❑ **Finding #6:** Documentation provided for the week of review demonstrated a daily vegetable shortage on Monday, Wednesday, Thursday, and Friday, which also led to a weekly vegetable shortage. On Monday, Wednesday, and Friday 1/2 cup of vegetable was served to students. On Thursday, 5/8 cup of vegetable was served to students. The K-8 daily vegetable requirement is 3/4 cup.

Because less than 3/4 cup of vegetable was served on Monday, Wednesday, Thursday, and Friday, only 2 7/8 cups of vegetable were served during the week of review. The K-8 weekly vegetable requirement is 3 3/4 cups.

Prior to lunch meal preparation on the day of review, the Public Health Nutritionist provided technical assistance about the daily vegetable requirement. The Food Service Director corrected the planned portion size for vegetable and all meals contained 3/4 cup vegetable on the day of review.

Corrective Action Needed: Submit a statement explaining how the K-8 daily 3/4 cup vegetable requirement and weekly 3 3/4 cups vegetable requirement during the week of review will be met and your plan for ensuring the minimum vegetable requirement is met for future service weeks.

Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

Please note, repeat violations of a daily and/or weekly vegetable shortage during subsequent Administrative Reviews may result in fiscal action.

☐ Finding #7: Documentation provided for the week of review demonstrated missing red/orange and beans/peas vegetable subgroups. On the planned monthly menu, there was not a red/orange vegetable planned during the week of review. Beans/peas were planned on the monthly menu, however, there was a snow day on the day the beans/peas were planned to be offered. On the planned production record for this snow day, the production record indicated that green beans and sauerkraut would be served instead, even though, green beans were actually served the day before.

The K-8 weekly red/orange vegetable subgroup requirement is $\frac{3}{4}$ cup and the beans/peas vegetable subgroup requirement is $\frac{1}{2}$ cup.

Corrective Action Needed: Submit a statement explaining how the K-8 weekly red/orange and beans/peas vegetable subgroup requirements will be met during the week of review and your plan for ensuring all K-8 vegetable subgroup requirements are met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

Please note, repeat violations of a missing vegetable subgroup during subsequent Administrative Reviews may result in fiscal action.

☒ Finding #8: Peace Lutheran School does not implement Offer versus Serve (OVS). Lunch signage includes the OVS terminology that students must select 3 full components, one of which is $\frac{1}{2}$ cup fruit, vegetable, or combination. Because students must select all five components, this does not accurately explain to students what constitutes a reimbursable meal.

Corrective Action Needed: Cover the OVS terminology on posted signage. **Corrected onsite. No further action is required.**

☐ Finding #9: Five non-reimbursable meals were observed during lunch service. Four students did not select milk and one student did not have fruit. Because Peace Lutheran School does not implement OVS, it is required that all students have all five components in order for the meal to be claimed for reimbursement. If a student does not want one of the components, then the student must be charged a la carte for all other components selected.

If Peace Lutheran School would like to implement OVS, it would need to be implemented for K-8 students since this is the meal pattern that is followed and lunch service overlaps between 4-8 students.

Corrective Action Needed: Submit a statement detailing how these meal errors will be corrected and avoided in the future.

☐ Finding #10: During lunch service, five students went through the point of service without having access to a choice of milk. It is required that two milk types be offered throughout the whole meal service. Technical assistance was provided prior to the second meal service where this occurred. When the milk types ran out, the Nutrition Program Consultant notified the school nutrition professional, and it was corrected as soon as possible. However, there should always be enough milk out so students have a choice between the two milk types at each service.

Corrective Action Needed: Submit a statement indicating understanding that two milk types are required to be available throughout the entire meal service and your plan for how this error will be corrected and avoided in the future.

Please note, repeat findings of offering only one milk type during subsequent Administrative Reviews may result in fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) and webcast are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>; <https://dpi.wi.gov/school-nutrition/training/webcasts#afr>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance](#)

[Q&A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

- Alternate meals for students without funds to pay, that are provided free of charge, must have the entire meal cost funded from a non-federal source and are subject to nonprogram foods revenue regulation as food service may not absorb the meal cost.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, no expenses are allocated to nonprogram foods and a portion of food, labor, purchased services, and other must be allocated to nonprogram foods.

Corrective Action Needed: Please submit an amended paper copy of your 17-18 Annual Financial Report, with nonprogram food expenses broken out, as the portal to resubmit electronically is closed, and provide a statement that going forward all revenues and expenses will be broken out by program and category.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus, nonprogram foods may never run in the negative and non-federal funds must be transferred into the food service fund to cover the deficit.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** Because the SFA sells vended meals to the daycare, the nonprogram food revenue tool is required.

Corrective Action Needed: Please complete the USDA nonprogram foods revenue tool https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls, for the 17-18 school year, and submit a statement that going forward the nonprogram food revenue tool will be completed on a yearly basis.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Processes for complaints

- All SFAs should have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information

necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints
https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf.

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>).

Findings and Corrective Action Needed:

- ❑ **Finding #1:** Seconds are allowed for grade 4 thru 8 students, but they are not allowed for younger grades. This practice is highly discouraged as this could be considered a civil rights violation if all students do not have the same access. Plus, seconds should never be planned for, and you could be using those leftovers in other reimbursable meals in the future.

Corrective Action Needed: Please submit a statement that you will either discontinue seconds or allow them for all grades.

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](#) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
 - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
 - Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
 - Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).

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

❑ Finding #1: SFA LWP meets some but not all requirements as stipulated above

The policy does not list an Official who oversees the policy and does not address marketing of food and beverages in the district. Please include information regarding marketing only Smart Snacks compliant products. The policy also states that whole grains will be used to the extent possible in the School Nutrition Program and “only” whole grains may be used.

Corrective Action Required: Please provide a timeline for updating the above items in your policy to become compliant with the final rule.

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

- At the time of the on-site review there were no foods or beverages sold at Peace Lutheran School, except for a la carte milk. 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 food or beverage sales.
- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day (midnight until 30 minutes after the instructional day). Foods and beverages sold in schools must meet both the general standards and nutrient standards, unless the sales qualify for an exemption. More information can be found on the [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>).

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- **Annual Training Requirements for All Staff**
Directors: 12 hours
Other Staff (20 hours or more per week): 6 hours
Part Time Staff (under 20 hours per week): 4 hours

Findings and Corrective Action: Professional Standards

- ❑ **Finding #1:** Training is not being monitored on a tracking tool.
Corrective Action Needed: Include all current training hours for each food service employee onto the DPI tracking tool (<http://dpi.wi.gov/school-nutrition/training/professional-standards>) and submit as corrective action.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety Plans

- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs.
- 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>)

Time/Temperature Control for Safety (TCS) Food

- Milk and dairy products
- Shell eggs
- Meat (beef, pork, and lamb)
- Poultry
- Fish
- Shellfish and crustaceans
- Baked potatoes
- Heat-treated plant food, such as cooked rice, beans, and vegetables
- Tofu or other soy protein
- Sprouts and seed sprouts
- Sliced melons
- Cut tomatoes

- Cut leafy greens
- Untreated garlic-and-oil mixtures
- Synthetic ingredients, such as textured soy protein in meat alternatives

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration or heat during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** The SFA’s plan has incomplete “Description of Program Overview and Facility, uncategorized menu items 1, 2, 3, and SOP’s are not site-specific.
Corrective Action Needed: Update the food safety to include all required elements and submit updated page as an attachment via email.
- ❑ **Finding#2:** No annual food safety plan review completed.
Corrective Action Needed: Review entire food safety plan and update as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review page as an attachment to assigned DPI Nutrition Program Consultant via email.

Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation. SFAs must monitor contractor performance, to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Non-Compliant Products Found Onsite

- The following products identified in Peace Lutheran School’s storage did not have proper labeling to identify the country of origin:
 - Vanilla extract- packed in

- Mayonnaise- distributed
- Tartar sauce- distributed
- Chili powder- no information
- Dried rosemary- marketed by
- Canned pumpkin- distributed
- Canned tomato sauce- distributed
- Frozen orange juice- NJ
- Tater tots- distributed
- Dinner rolls- manufactured
- Chicken nuggets- distributed
- Shredded cheddar cheese- distributed
- Butter- distributed
- In USDA Memo SP 38 -2017, any product that does not identify the country of origin requires certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products.

Achieving Buy American Compliance

- 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 percent 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 which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (https://dpi.wi.gov/school-nutrition/procurement/procurement-manual). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed for Buy American:

☐ **Finding #1:** The following food items were identified in Peace Lutheran School’s storage area as non-domestic:

- Egg noodles- product of Italy
- Canned fruit cocktail- product of China

- Canned pineapple tidbits- product of Thailand

Peace Lutheran School does not have Buy American – Non-compliant Lists or SFA equivalent form for these product.

Corrective Action Needed: Begin using Non-compliant Product List forms or SFA equivalent for tracking non-domestic products. Provide a copy of the completed forms for the non-compliant products listed as corrective action. The [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx) is located on the Buy American Provision webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx>).

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

Commendations/Comments/Technical Assistance/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. Even if a summer feeding program is not operated at the school district, 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](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

Findings and Corrective Action: SBP and SFSP Outreach

- ❑ **Finding #1:** Summer food service outreach was not provided to students.

Corrective Action Needed: Please provide a statement that you will notify students of the ability to receive free summer meals.

Carolyn Stanford Taylor, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. Her 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/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).