

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Cristo Rey Jesuit Milwaukee High School Agency Code: 401712

School(s) Reviewed: Cristo Rey Jesuit Milwaukee High School

Review Date(s): 12/12-14/16

Date of Exit Conference: 12/14/16

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 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 webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a "Nutshell": <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf> . For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff for the courtesies extended to us during the on-site review. Staff were available to answer questions and were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- 143 eligibility determinations were reviewed, 16 errors were identified. Of the 16, 5 are correctable if received by the corrective action deadline (missing social security numbers or indication of not having one). Fiscal action will be assessed on 11 and any of the 5 not corrected within the negotiated deadline. Send a letter of adverse action for a decrease in benefits, allowing 10 calendar days for the households to appeal. If there is not an appeal, the benefit issuance list/point of sale should be update on the 11th calendar day. One error was found on a denied application (SFA-2). Benefits should be increased no later than 3 calendar days. Copies of optional letter templates were emailed to the SFA to communicate changes as a result of the review.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year. Cristo Rey Jesuit had an 11.19% error percentage from SFA-1 and will be required to conduct a second review of applications in the following school year. More information on this requirement is found in the Eligibility Manual <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-2016.pdf> . You will also receive a SNT memo in June with more information.

Applications

- When the application lists income sources in the same frequency, the application must be determined in that same frequency (weekly, bi-weekly, monthly, two-times per month). The only time an application can be annualized is when the application lists multiple frequencies of income.

Zero Income

- Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies that there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

Household Size Box

- As a reminder, for the household income size box:
 - If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household. Clarify the correct number of people in the household and ensure all household members have been included on the application along with their income sources before an eligibility determination is made.

- If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination.

Incomplete Applications

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

Limited English Proficiency (LEP)

- There is a need at Cristo Rey Jesuit for application and verification communications to be provided in Spanish and English, which the school is accommodating well. This assists in diminishing language barriers to participation.

Verification

- The SFA used Direct Verification to confirm case numbers on a couple of applications selected as part of the verification process. This is a helpful process- continue to use this option. The household must still be contacted to communicate their application has been chosen for verification, but the template letter can be modified as appropriate to accommodate direct verification language.
- The only applications subject to the 'confirmation review' are those selected as a result of the sampling method calculation- your 'sample size'.

Meal Counting and Claiming

- No errors in the meal counting and claiming system. The SFA effectively uses a combination of the electronic point of service software system (bar code scanning/ID entry in keypad) and manual edit check before online claim submission.
- The agency has missed NSLP and SBP monthly claim deadlines for four separate months after beginning the USDA meal programs in August 2015. September-2015, April-2016, May-2016, and September 2016. For the month of September-2015, the SFA chose to use their one-time 36-month exemption per program to recoup reimbursement. During this time, the SFA was reminded of USDAs 60 calendar day claim deadlines and provided the calendar of requirements link via email. For the April, May, and September- 2016 claims, no further flexibility could be extended, resulting in the forfeit of reimbursement. The SFA was reminded to meet claiming deadlines. We encourage the SFA to submit claims well before the end of the 60-calendar day deadline and account for any reports that need to be submitted prior to claim entry (e.g., Paid Lunch Price, FNS-10). A best practice is to have all claims submitted by the 15th of each month (September's claims would be submitted by October 15).
- Severe Need Breakfast reimbursement
The agency may be eligible for Severe Need Breakfast reimbursement in the 2017-18 SY. The SFA will need to assess and elect via the online contract that is submitted in May 2017 using lunches claimed from the 2015-16 SY. If >40% were served at the free and reduced rate, the SFA is eligible to apply. DPI does not auto-enroll agencies in SBP-SN.

Findings and Corrective Action Needed

Certification and Benefit Issuance

- **Finding #1:** 17 application approval errors were found between SFA-1 and SFA-2.

Corrective Action Needed: Where applicable, notify households of the reduction in benefits (to take effect no earlier than 10 calendar days from the date the letter was sent. Record the “date of correction” on the SFA-1 form when the letter is sent. The upward correction on the SFA-2 form should be implemented no later than 3 calendar days. Note the “date of correction” on the SFA-2 form. Submit completed copies of the SFA-1 and SFA-2 forms via email to the Nutrition Program Consultant. In addition to the review forms, submit copies of the letters sent to households and a final copy of the updated benefit issuance list to show the change was implemented within the point of service system.

- **Finding #2:** Direct certification was not completed at or around the beginning of the school year. The beginning of the school year for Cristo Rey Jesuit was 8/15/16. The first run was conducted on 10/4/16. Conducting direct certification this late in the school year results in a delay of benefits to eligible children, accrual of negative meal balances for new students without carryover, and additional processing of applications that may already have matched to direct certification. At a minimum, SFAs must run the process three times during federally required time periods each year:
 - At or around the beginning of the school year (July – September)
 - Three months after the first run (October – December)
 - Six months after the first run (January – April)

Corrective Action Needed: By signing this report, the agency is agreeing to run DC as required.

- **Finding #3:** The agency is backdating eligibility on the benefit issuance list to the date the household submitted the application rather than the date the application was determined complete by the determining official (DO).

Corrective Action Needed: Submit an email statement explaining how the agency will proceed with effective date of eligibility and applications. LEAs may establish the date of *submission* of an application as the effective date of eligibility (through date stamping), rather than the date the application is determined by the DO. This flexibility applies only to complete applications containing all required information, as well as when waiting for documentation of other source categorical eligibility (e.g., for homeless or migrant children) indicated on a household application. See SP 11-2014. *The SNT must be contacted prior to implementing this flexibility for approval. Contact the assistant director at karrie.isaacson@dpi.wi.gov for more information and approval. If the agency fails to apply or be approved for this flexibility the effective eligibility date on applications must be the date the DO deems the application complete.*

- **Finding #4:** The agency did not allow for *operating* days carryover. The SFA used *calendar* days, which would be a shorter time-frame. If a new status has been received (DC, application, or other) it should be processed/implemented within the required 10 operating days of receipt. Carryover is not intended to delay this processing of a new school years’ status.

Corrective Action Needed: By signing this report, you agree to apply carryover guidance for *operating* days rather than calendar days.

Verification

- **Finding #1:** The verification process (pool, sample size, and request/review of household documents) was not completed for the 2015-16 SY or the 2016-17 SY by November 15.

Corrective Action Needed: Submit a statement via email outlining a timeline of when verification will be completed for the 2016-17 SY. Include when the process will be started in following years to ensure completion by November 15. The verification collection report (VCR) is encouraged to be completed right after the process, but it not due online until February 1.

- **Finding #2:** The SFA over verified applications as part of the sample size and VCR reported in the 2015-16 SY. The pool included direct certification rather than just applications on file from October 1. This resulted in a sample of 4 applications versus 2. Despite calculating a sample of 4 in error, the SFA verified 6 applications total (5 through direct verification and 1 through household submission of pay stubs).

Corrective Action Needed: By signing this report, you agree to only include applications on file as of October 1 to be part of the verification 'pool'. In addition, after the sample size and type are chosen the agency agrees not to over verify applications. Rounding is not standard; always round up (e.g., 1.44= 2 applications).

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all staff for the warm welcome to Cristo Rey Jesuit Milwaukee High School. Thank you also to Taher for sending all documentation ahead of time for the week of review and days of onsite review in an organized manner. Your communication and responsiveness to questions is greatly appreciated! It is clear your staff is dedicated to serving healthy meals to students. The placement of the service line is commendable; putting fruits and veggies in the beginning prior to the other components. This allowed students to fill their trays with fresh, healthy produce first.

Comments/Technical Assistance/Compliance Reminders

Planned Meals: The production records should reflect the actual planned number of servings, and should be forecasted based on historical data. During the week of review, breakfast production records listed 236 planned meals for all five days of the week, yet an average of 27 meals were served. It is unlikely that this is true, especially when considering Offer Versus Serve (OVS). Going forward, please make sure planned meals are being filled out correctly.

Documentation: Food manufacturers are continually reformulating products used in schools. It is important to stay current with these changes and be confident that the documentation on file, including Product Formulation Statements (PFS), match the products in stock. These records should be reviewed and updated at least annually and as new products are purchased or substituted. Also, please be sure to discard any outdated crediting information for products that have changed or that are no longer purchased.

Extras: Extra, non-creditable items such as potato chips are offered on the menu. These do not credit toward the meal pattern, but must be included in the dietary specifications (calories, saturated fat, and sodium). While occasional use of this type of food is allowable and can be a nice incentive for participation, it does count toward the calorie, saturated fat, and sodium limits, without being able to fulfill any of the required components. It can be very difficult to stay within the dietary specification limits. This type of food is also adding to the cost of the meal without providing the value of being a creditable component for a reimbursable meal.

Crediting: As a reminder, crediting for fruits and vegetables are credited by volume, in 1/8 cup increments (1/8 cup, 1/4 cup, 3/8 cup, 1/2 cup, etc.). Crediting increments must always be rounded down to the nearest 1/8th of a cup. A few of the recipes had crediting of 1/3 cup vegetable, which should be rounded down to 1/4 cup for crediting purposes. The Breakfast Potatoes and Kung Fu Carrots recipes were updated to reflect the correct vegetable crediting.

Training: Staff at the Point of Service (POS) must know what constitutes a reimbursable meal. During the day of review, staff missed a tray containing no fruits and/or vegetables, which was deemed a non-reimbursable meal. It is recommended that anyone involved with the school meals program, and especially at the POS, attend DPI training classes, or watch webcasts from the DPI School Nutrition Team Website. The classes are offered in the summer and select other times throughout the year. Classes are provided free of charge. Numerous webcast training sessions are also available online. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the USDA requirements for the federal nutrition programs including Offer versus Serve (OVS). Information on summer classes will be sent to School Food Authorities in late spring and is also available on the DPI website at <http://dpi.wi.gov/school-nutrition/training>.

Signage: It is required to post signage visible to the students that indicate the offered components in each meal, including what they must select in order for their meal to count as reimbursable. Although there was a breakfast signage poster, it was behind the lunch signage poster and not filled out. The breakfast signage should list the three components and the four items offered, and must communicate to students that under Offer Versus Serve, a student must select at least three food items, one of which must be at least 1/2 cup of fruit, vegetable, or a combination of fruit and vegetable.

Corrective Action

- **Finding #1:** There was a shortage of red/orange vegetables during the week of review. Only 1 cup was offered during the week (1/4 cup Monday, 1/4 cup Wednesday, 1/4 cup Thursday, and 1/4 cup Friday). For the high school students under the 9-12 meal pattern, a full 1 1/4 cup needs to be offered during the week.

Required Corrective Action: Please state what you will do to the week of review so that a full 1 1/4 cup red/orange vegetable is offered to students during the week. **The serving size for carrots was increased from 1/4 cup to 1/2 cup. Corrective action received, no further action required.**

- **Finding #2:** There was a daily vegetable shortage on Wednesday during the week of review. Only 3/4 cup of vegetables were offered to students (1/2 cup spinach, which credits as 1/4-cup dark green

vegetable, ¼-cup broccoli, and ¼ cup carrots). Under the 9-12 meal pattern, a full 1 cup needs to be offered daily to students.

Required Corrective Action: Please state what you will do to the week of review so that a full 1 cup of vegetables are planned and offered to students. **The serving size for the dark leafy greens was increased to 1 cup, which credits as ½ cup vegetable. Corrective action received, no further action required.**

- **Finding #3:** Processed products require 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 be 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, it may not be credited when served as part of the USDA’s Child Nutrition Programs. Additionally, remember to collect new product labels annually, as well as updating records when new products are purchased and when product formulations change throughout the school year. More information regarding crediting documentation can be found at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>
 - The PFS provided for the Michael’s Foods Egg Mixture in the Egg Burrito was incomplete and incorrect. A template needs to be filled out using a specific entry from the Food Buying Guide (FBG). For example, Eggs, Frozen, Whole Eggs, followed by the ounces per raw portion of creditable ingredient, FBG yield/servings per unit, and the creditable amount. A PFS template for Meat/Meat Alternate can be found: <http://www.fns.usda.gov/sites/default/files/PFSmma.pdf>
 - The PFS provided for the Hormel Deli Ham was outdated and incorrect.

Required Corrective Action: Please provide an updated and correct Product Formulation Statement (PFS) for the following products, or state what you will do going forward:

- Michael’s Foods Egg Mixture – **Will no longer credit the Egg mixture as a Meat/Meat Alternate and will leave as an extra. This will be done for the Egg Burrito, which contains 2 oz eq grain from the tortilla. No PFS will be obtained. Corrective action received, no further action required.**
- Hormel Deli Ham –**Updated and correct PFS sent for this product. Corrective action received, no further action required.**

3. RESOURCE MANAGEMENT

Commendations

- The paid lunch equity tool was completed as required. Cristo Rey is above equity at \$3.15. Continue to set paid lunch prices annually per the results of the PLE tool. As a reminder, the tool is released by USDA around February and DPI requires the tool to be uploaded to the online contract in May.

Comments/Technical Assistance/Compliance Reminders

Annual Financial Report:

- SFAs should be tracking and separating all cost/revenue of nonprogram foods from cost/revenue of program foods within the AFR. This is to ensure the reimbursement and student payments received for program foods are not subsidizing the cost of nonprogram foods like adult meals and extra milk. On the 2016-17 SY Food Service AFR, a column has been added called “nonprogram foods”. If the cost exceeds the revenue for nonprogram foods, a separate transfer from outside funds must be made into the food service account specifically for the purpose of covering nonprogram foods.
 - Cristo Rey will show a transfer in nonprogram foods annually based on their current practices. This is because the only nonprogram foods the agency sells are adult meals and extra milk- and the agency has chosen to provide teachers with a free meal. Cost per meal can be determined by the vendor charges. Revenue can be determined by the adult meal charge set on the online contract. For extra milk (taken during sack lunch distribution), the cost is determined by the vendor’s per carton charge. The revenue received per carton must at least cover the cost. For example, revenue would need to be greater than or equal to \$0.40/carton the SFA is charged. The agency will need to decide if the extra milk cost will be covered by the households or outside funds. The food service account cannot absorb this cost.
- The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>

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. Supplies/resources may not be used for outside school functions.
- 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. SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.

Revenue from Nonprogram Foods

- Nonprogram Foods Revenue Rule SP-20-2016 <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
- Nonprogram Foods in a nutshell <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
- All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- At this time, Cristo Rey Jesuit only sells extra milk and adult meals as nonprogram foods is exempt from completing the USDA Nonprogram Food Revenue tool <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>. Because this tool is the reason food cost would need to be separated from labor, etc., Cristo Rey may continue allocating expenses all under purchased service in the

nonprogram foods column- but must separate program and nonprogram revenues and expenses as noted above.

Findings and Corrective Action Needed:

Comprehensive Reviews- Maintenance of the Nonprofit School Food Service Account and Revenue from Nonprogram Foods

- **Finding #1:** Nonprogram cost and revenues are not tracked within the accounting records. Adult meals are tracked within Power School point of sale, but this data did not make its way to the financial ledgers/AFR. A transfer was made from the general fund at the end of the school year to bring the whole food service account to \$0 after ending in the negative. However, part of the transfer contained program student revenues making it difficult to determine if this revenue was in-part subsidizing nonprogram teacher meals and extra milks not tracked at a point of service.

Corrective Action Needed:

- Submit a statement explaining how the SFA will track adult meals and extra milks in the accounting records (e.g., monthly or yearly journal entry).
- Explain how the agency will cover the cost of extra milks and teacher meals through a separate general fund transfer specifically for losses in non-program foods regardless if the food service account ends in the positive.
- Explain how extra milks will be tracked at the point of service. Will the SFA continue to allow this practice, charge the households a per carton cost, or cover cost with general school funds?

4. GENERAL PROGRAM COMPLIANCE

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

Special Dietary Needs

- Special dietary accommodations were discussed. If providing a fluid milk substitute for students who are lactose intolerant, it cannot be juice, unless based on a documented disability by a medical practitioner. Water is available to all students, a lactose free milk could be offered or you can provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide us the nutritional panel from the product you will be using. For more information on fluid milk substitutes, <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- All food substitutions for children with disabilities must be documented by a licensed medical professional. We have a prototype Medical Form posted on our website that is also available in Spanish and Hmong that you can use http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special_dietary_requests_form.pdf. When the form is completed indicating that the special dietary request is based on a disability, the school is required to provide a meal that meets the child's needs as documented. The meal would not have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child. 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>.
- School food service staff may make food substitutions, at their discretion, for individual children who do not have a disability. The school must still have a completed Dietary Request Form on

file from a medical authority (could be a school nurse) certifying the student as having a special medical or dietary need. Such determinations are only made on a case-by –case basis and all accommodations must be made according to the USDA’s meal pattern requirements in order to claim.

Local Wellness Policy

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

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

Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder [Local Wellness Policy Builder Online Tool.](#), and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Smart Snacks in Schools

- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management. The AR at Cristo Rey is considered to be in the director role.
- Training obtained since April 1, 2015 may count towards training requirements. 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 website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.
- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Directors	Managers	Other Staff	Part Time Staff
	(20 hrs or more/week)	(less than 20 hrs/week)	
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

Water

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups. Cristo Rey has a drinking fountain in the café, but it was blocked by holiday decorations for student access. This was fixed onsite per reviewer request. Make sure this drinking fountain is not obstructed during meal service.

Food Safety, Storage and Buy American

Food Safety Inspections

- Every school operating USDA School Child Nutrition programs, must have two food safety inspections during each school year, one in the fall of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site's Food Safety Plan. It is the SFAs responsibility to reach out and request these reviews each year.

Food Safety Plans /Storage

- The Food Safety Plan was available for review, which was complete and specific to the review site. I recommend reviewing section *XI. Master Cleaning and Sanitation Schedule* so food service storage areas are attended to on a regular basis. Cooler floors were sticky, shelving cramped, and the inside of the milk service cooler needed to be cleaned/defrosted. Staff cleaned milk cooler while reviewer was onsite. SFA and Vendor staff agreed to complete a defrost of the milk cooler at semester.
- All food service employees have a signed Employee Reporting Agreement on file.
- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).

ShareTables /No Thank You Tables/Donations/Animal Feed

DPI no longer requires the pre-approval of Share Tables, No Thank You Tables, and for donations. This change is in response to SP 41-2106, which encourages agencies to support efforts to minimize food waste. However, focus should be first emphasized on source reduction (menu planning/forecasting, Offer vs. Serve, and Smarter Lunchroom techniques). If an SFA chooses to implement any of these options, they are accepting all liability. Schools wishing to utilize any of these options must have a site specific Standard Operation Procedure and must document the leftover items daily <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/monitoring-log-for-no-thank-you-table.pdf> ; <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-tables.docx> . Leftover items that are considered wholesome may be used at a later meal service, put out the next day in a separate part of the cafeteria as an extra, free item, given out to students later in the day, given to a school nurse to hand out as needed, donated to a charitable organization or composted. Adults may not consume these items. ****Any leftover food cannot be used as animal feed – please contact DATCPFoodMailbox@wisconsin.gov or Heather.Bartley@wisconsin.gov if you have questions about restrictions on using leftovers as animal feed.* For more information on Sharing Tables, No Thank You Tables, and donations, please see our food safety website.

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. 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. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

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.

- The following nondomestic products were noted onsite/during the offsite review of crediting documentation: Pineapple (Costa Rica); Mandarin Oranges (China); Olive Oil (Canada and other nondomestic countries); Whole Kernel Corn (Canada). Most of these products can be tracked and fall under the limited exceptions. WK Corn was discussed with vendor onsite and a new product was sourced during the onsite review. Thank you.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

Reporting and Recordkeeping

- As a reminder, the October claim cannot be submitted until a couple required annual reports including Paid Lunch Price and FNS-10 are submitted. The online portal for these reports opens on November 1. The annual calendar of program requirements can be found here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf>

SBP and SFSP Outreach

Breakfast

- Thank you for your breakfast outreach efforts! Cristo Rey Jesuit conducts breakfast outreach through a few avenues: an annual open house, back-to school night and on menus posted and sent to households. At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year. Despite these efforts, reviewer noted breakfast service is very short (7:15am-7:28am), which does not leave much time for students to access and eat breakfast. This timeframe is also used by students to go to their lockers and/or take a bathroom break. 20 minutes is recommended for meal service. I would also encourage the agency to look at alternative breakfast models, like breakfast in the classroom, or a grab and go to increase participation and eliminate barriers to access. More information on these models can be found on the breakfast webpage: <http://dpi.wi.gov/school-nutrition/school-breakfast-program>

Summer Meals

- Cristo Rey Jesuit served as a meal site for MCFI last summer. Thank you! A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](#) on the [DPI Summer Meals website](#)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
 - Promotion of the USDA Summer Food website <http://www.fns.usda.gov/summerfoodrocks>.

- To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

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

- **Finding #1:** The agency does not have an active Local Wellness Policy (LWP) as required by the proposed rule and 2004. 2015-16 SY was the first year of program participation for Cristo Rey Jesuit. However, over the course of the 2015-16 SY the agency should have developed and implemented a policy.

Corrective Action Needed: Submit a local wellness policy using the resources located on the DPI and USDA Websites: <http://dpi.wi.gov/school-nutrition/wellness-policy>. When developing the policy include minimum required components from the final rule.

Agency had a Wellness Policy in progress, but it was not finalized/submitted offsite. This policy was submitted to reviewer while onsite along with a timeline for further review and implementation. No further action needed.

- **Finding #2:** Professional Standard hours are not being tracked.

Corrective Action Needed: Submit a tracking tool with all training hours completed from April 1, 2015- current for staff that work directly with the food service program.

- **Finding #3:** The director of the food service program does not have the required 8 hours of food safety training.

Corrective Action Needed: Submit a timeline and plan of topics for completing this requirement within the current school year. I recommend completing a food safety certificate, but this is not a requirement.

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snacks (ASP)

- **Finding #1:** The SFA does not operate the ASP as indicated in 2016-17 SY online contract.

Corrective Action Needed: Remove ASP from the online contract by removing the selection on the SFA-wide policy statement page, Schedule A, and the site-specific policy statement page. To-date the SFA has not submitted reimbursement claims.

6. COMMUNITY ELIGIBILITY PROVISION (CEP) AND PROVISION 2

Comments/Technical Assistance/Compliance Reminders

The agency may consider applying for CEP in the 2017-18 school year. To be eligible, the school must continue to serve both breakfast and lunch and have an identified student percentage (ISP) of >40% reflective of April 1, 2017 enrollment. At this time, the agency has a proxy ISP of 47.90%. CEP may be a good option to reduce administrative tasks, manage unpaid meal charges, and of course increase meal access. I would encourage the district to run direct certification more often to

match additional students before April 1, potentially increasing the ISP. More information, including financial feasibility can be found on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility> .

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

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

