

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

School Food Authority: Clara Mohammed School

Agency Code: 40-7105

School(s) Reviewed: Clara Mohammed School

Review Date(s): December 5-6, 2018

Date of Exit Conference: 12/6/2018

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Clara Mohammed School for the courtesies extended to us during the on-site review and for being available to answer questions and provide 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.

The DPI review team appreciates the eagerness of the staff at Clara Mohammed for their willingness to make changes to meet school nutrition program regulations and to continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance (TA)/Compliance Reminders

COMMUNITY ELIGIBILITY PROVISION (CEP)

COMMENTS/TECHNICAL ASSISTANCE (TA)/COMPLIANCE REMINDERS

- It is necessary to maintain all certification documents supporting participation in CEP. **REMINDER:** the current identified student percentage (ISP) and claiming percentages are approved through the 2021-2022 school year, for a four-year cycle. The current CEP cycle approval documents were available onsite. CEP participating schools will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).
- [USDA Community Eligibility Provision guidance](http://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) has been expanded in memo SP 54-2016 (www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) to allow for the use of one form for both meal eligibility and as an alternative household form to be used in CEP schools. This may alleviate confusion among households and administrative staff at a mixed district. This memo clearly outlines the requirement to cost-allocate expenses back to the district for processing and distributing forms in CEP schools. CEP applications and labor hours involved with processing them cannot be paid for from the nonprofit school food service account.
- There must also be a method to accurately distinguish between forms from students in CEP versus non-CEP households. CEP applications are not subject to verification, independent review of applications, and the certification and benefit issuance portion of the AR review, nor do these students carry individual meal eligibilities that can extend benefit to other students.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs

- Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.
- Because CEP schools do not collect household applications, there is a [CEP-modified public release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) available for use on the DPI website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>). All elements of the template must be used in the public release

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Meal Counting and Claiming

Comments/Technical Assistance (TA)/Compliance Reminders

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission. [Edit check templates](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility#monitoring-claiming) for use in CEP sites are available on the DPI website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility#monitoring-claiming>).
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- **REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.**
- CEP sites only need to track the total number of breakfast and lunch meals served each day, and do not need to keep track of meals served by FREE, REDUCED, and PAID rate categories. Instead, the total number of meals will be reimbursed at FREE or PAID rates.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #1:** The individual site edit check is not used to determine the number of reimbursable meals to claim by eligibility for claim submission.
Corrective Action Needed: Please submit a statement of understanding regarding the requirement to complete and review edit checks prior to submitting claim for reimbursement. **Also**, please submit lunch and breakfast edit checks to reviewer, for the month of December, before submitting the December claim.

- ❑ **Finding #2:** Several consolidation errors were identified in reviewing the claim for the month of review.
Corrective Action Needed: Please submit a statement of understanding of the importance of accurate claim consolidation. It is recommended that the SFA begin using DPI-developed counting template for CEP schools. Please submit all count sheets for month of December, to reviewer, prior to submitting December claim.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service director and the nutrition staff of Clara Mohammed School for all you do to feed your students healthy meals. The nutrition professionals were positive, enthusiastic, friendly, personable, and worked well with the students. Thank you also to the kitchen staff for doing a great job preparing and serving nutritious, tasty meals to students. Offering so many fresh fruit and vegetable options is wonderful to see, this encourages healthy, lifelong eating habits.

Comments/Technical Assistance/Compliance Reminders

Training Opportunities

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training](#) webpage, under Upcoming Trainings (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts](#) webpage (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Resources

The Food Buying guide (FBG) is a crediting resource for Items that are not processed prior to purchase, such as raw meats, beans, eggs, fruits, vegetables, and milk. For the most current, accurate information, view or print the [FBG](#) electronically (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Save this link for easy access.

USDA has a toolkit of resources to assist schools in meeting the new nutrition standards on their "[Healthier School Day: The School Day Just Got Healthier](#)" webpage (<https://www.fns.usda.gov/healthierschoolday>). The topics covered include "Focusing on Smart Snacks in Schools," "Offering Fruits and Vegetables," "Reducing Sodium," and "Serving Whole Grain-Rich."

A good resource for your kitchen and during recipe development is from The Institute of Child Nutrition. Its organization has printable resources called [Basics at a Glance](https://theicn.org/icn-resources-a-z/basics-at-a-glance/) that contain recipe abbreviations, measurement conversions, portioning tools, and steam table pan capacities (<https://theicn.org/icn-resources-a-z/basics-at-a-glance/>).

For menu planning and recipe development the DPI website has a Weekly Nutrient Calculator, which can be used to analyze calories, saturated fat, and sodium values weighted over the week. When analyzing nutrients, remember that the values must be weighted according to popularity (how the menu planner plans for each item to be selected). This tool can quickly show both high and low menu items, as well as high or low days on the menu, making it quick to determine which days could be mixed and matched throughout the month. This tool can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage, under Menu Planning Tools (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools>). The 5-day version should be used for your site.

Hunger Solutions

According to [The School Day Just Got Healthier Fact Sheet: Calories in School Meals](https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf), there are no specific maximums for fruits or vegetables (<https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf>). Schools may allow greater amounts than the required minimums by offering self-service or allowing seconds servings of fruits and vegetables. Additional offerings do count towards the weekly calories limits, but because fruits and vegetables are generally lower in calories, they can be excellent sources for satisfying meals and sustaining energy. USDA policy memorandum [SP 41-2014](https://fns-prod.azureedge.net/sites/default/files/cn/SP41-2014os.pdf) also states that with time-limited lunch periods and increased amount of fruits and vegetables offered as part of the meals, some students may be inclined to save some items for consumption at a later time (<https://fns-prod.azureedge.net/sites/default/files/cn/SP41-2014os.pdf>). There is no federal prohibition of this practice, and Food and Nutrition Services (FNS) encourages it as a means of reducing potential food waste and encouraging consumption of healthy school meals. For food safety concerns, this practice should be limited to only food items that do not require cooling or heating, such whole fruit, cereal, or packaged crackers.

Equipment Grants

The United States Department of Agriculture (USDA) distributes funding annually to State Agencies (SAs) to award equipment assistance grants to eligible School Food Authority's (SFA's) participating in the National School Lunch Program (NSLP). Priority for this grant is given to schools that have not received similar USDA equipment grants in the past and have 50% or higher free and reduced-price eligibility. Requested equipment must cost more than the SFA's definition of capitalization threshold or \$5,000, whichever is less. For the fiscal year 2018 grant, the SFA's capitalization threshold can be no lower than \$1,000. More information can be found on the [NSLP Equipment Grant Opportunities](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) webpage (<https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant>).

Signage

The National School Lunch Program (NSLP) regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at breakfast and lunch. Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Signage on a garden bar, for example, can help teach children what an accurate portion size should be. After implementing a garden bar, [Salad Bar Signage Template](#) can be found on our [Signage](#) webpage, under the heading Additional Signage Resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>; <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

An in-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the School Food Authority's (SFAs) next regularly scheduled Administrative Review (AR). Additionally, an in-house yield study may be used for food items or sizes that are not currently listed in the FBG (e.g., 175 count apples). [In-house Yield Study Procedures](#) are available on the [Menu Planning](#) website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

If you are interested in ordering signage from SNT, please visit the [Team Nutrition](#) webpage and complete the Resource Order Form, under the Resources heading (<https://dpi.wi.gov/team-nutrition>).

Offer versus Serve

Offer versus Serve (OVS) is not being properly implemented. Students are served all five components rather than allowed to select three components and decline two components. As a reminder, OVS is required for the 9-12 age/grade group for lunch. While OVS is optional for all grade levels at breakfast, it is highly encouraged in order to reduce food waste and allow students to make choices about which foods they want. Offer versus Serve (OVS) is not required for grade K-8 students, although it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, grade K-8 students must be served $\frac{3}{4}$ cup vegetable and $\frac{1}{2}$ cup fruit to create a reimbursable meal. If OVS is implemented, then students can choose three of the five components offered, including $\frac{1}{2}$ cup fruit, vegetable, or combination to create a reimbursable meal. It is important for the food service staff to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](#) and the [Offer Versus Serve Webcast](#) can be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts>).

Production Records

There were no breakfast/lunch production records on file for the week of review. Production records are required as documentation that your school is serving reimbursable meals that contain all required meal pattern components; without production records, there is no way to prove that reimbursable meals were served. **Fiscal action maybe be assessed for the review month.**

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Production records are intended to be useful tools to record information prior to production, during production, and following production. While there is no required production record template, there are some examples that may be used on our [Production Records](#) webpage.

A copy of the production record requirements "[Must Haves and Nice to Haves](#)" list can also be found at that link (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). Please review this list and be sure the menu planner and the food service director is aware of what must be included on the production record.

Be specific on production records about the identity, brand, and description of the items served. An example, fruit sizes (e.g. case count) should be recorded. Instead of “fruit cup”, list both the applesauce cup and peach cup separately. List the specific type of granola bar or cereal bar offered, and list both when two types are offered, rather than just listing “cereal bar” or “granola bar” as these do not indicate exactly what was served. It is helpful to include not just portion size, but also crediting, on the production records. Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take.

Milk is a required component as part of the National School Lunch Program (NSLP). You must record daily usage by milk type on your production records (e.g., skim chocolate milk, 1 percent white milk).

Menu Planning

Menu planning worksheets are very helpful tools to ensure meal pattern requirements are met at both breakfast and lunch (particularly vegetable subgroup requirements). These can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage, under the Menu Planning Tools heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools>). Menu planning worksheet [directions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf) can be found here (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf>).

Menus must be planned to meet meal pattern requirements. The following blank template contains the basic information needed to plan compliant menus for the selected age/grade group.

All are 5-day week:

- [K-5 Elementary School](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-5.doc) (Lunch) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-5.doc>)
- [6-8 Middle School](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-6-8.doc) (Lunch) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-6-8.doc>)
- [K-8 School](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc) (Lunch) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc>)
- [9-12 High School](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc) (Lunch) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc>)
- [K-12](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx) (Breakfast) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx>).

Whole Grain Rich

As a reminder, 100 percent of your offerings for breakfast and lunch must be whole grain-rich (WGR). This includes processed entrée items as well as additional grains like pasta and rice. A few items for breakfast and lunch were not WGR. Please review each grain item offered to ensure that it meets the criteria. Additional information on WGR, including how to determine if a product is WGR, can be found in the [USDA Whole Grain Resource](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#grain) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#grain>).

[Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1.0 oz eq for each specific group (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). Exhibit A groups all grain products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:

- Group A: these products are hard and crunchy, dry and lightweight. Per ounce, they contain a good deal of grain.
- Group B: whether serving bagels, pizza crusts or tortillas, 1.0 ounce of these products all credit the same towards the meal pattern (1.0 ounce by weight = 1.0 oz eq grain).

- Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1.0 ounce of pancake does not credit as 1.0 oz eq like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz eq grain.

Exhibit A can be used to credit any of the products that appear in the table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

Milk Types

The only allowable milk types in Child Nutrition Programs are fat-free (skim) and low-fat (1 percent) flavored and unflavored milk. Two percent flavored or unflavored milk cannot be served. Discontinue serving 2% milk. As a reminder, at least two allowable milk types must be offered at breakfast and lunch. USDA has allowed 1% flavored milk to be offered in the NSLP and SBP **only** during SY 2018-2019. Be aware that nothing has been announced regarding allowable milk types for future school years. Any announcements from USDA will be included in [communications from DPI](https://dpi.wi.gov/school-nutrition/communications) (<https://dpi.wi.gov/school-nutrition/communications>).

Standardized Recipes

Use of standardized recipes is another important part of USDA School Meals Programs. Any menu item that has more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Continue to use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the [Standardized Recipes](https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) webpage (<https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>). We encourage viewing the webcast, [What's the Yield with Standardized Recipes?](https://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (<https://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

Crediting Documentation

Any processed product that is not listed in the USDA *Food Buying Guide* for Child Nutrition Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to credit toward the meal pattern. A complete PFS must come directly from the manufacturer and 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. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson) and dated. If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for Child Nutrition Programs, it may not be credited when served as part of the USDA School Meal Programs. Additionally, remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. All documents should be reviewed twice per year for accuracy. More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

USDA Meal Patterns

Clara Mohammed School is currently serving all students (grades K4 through 12) the Child and Adult Care Food Program (CACFP) meal pattern for grades K-12. Following the National School Lunch Program (NSLP) meal pattern and aligning with the USDA age/grade groups are critical to ensuring minimum daily and weekly requirements are met within the appropriate dietary specifications. The students of Clara Mohammed School must be grouped based on one of the following options: K-5, 6-8, and 9-12 **OR** K-8 and 9-12.

☐ Meal Pattern Finding #1: Following incorrect meal pattern

Corrective Action Needed: Please send a detailed statement to the PHN on the review describing how the FSD will ensure all students are being offered the correct portion sizes and amounts to meet the NSLP meal pattern.

Signage

Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. The breakfast signage must list the three components and the four items offered, and must communicate to students that under Offer versus Serve (OVS), they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination.

☐ Meal Pattern Finding #2: No signage posted

Corrective Action Needed: Signage was given to FSD on-site. Send a picture of lunchroom with signage in place and being used.

Offer versus Serve

Students are served all five components rather than allowed to select three components and decline two components. As a reminder, OVS is required for the 9-12 age/grade group for lunch. While OVS is optional for all grade levels at breakfast and K-8 students, it is highly encouraged in order to reduce food waste and allow students to make choices about which foods they want.

☐ Meal Pattern Finding #3: Offer versus Serve (OVS) is not being properly implemented.

Corrective Action Needed: Please provide the PHN with -

- A plan of action (training plan) in the form of a detailed written statement
- A signed roster and webcast quiz completion form for all staff
- A plan indicating how errors will be corrected and avoided in the future

Production Records

Production Records are required, none were observed on site or provided to the PHN.

☐ Meal Pattern Finding #4: Production Records are not being used

Corrective Action Needed:

- a. Provide documentation –invoice, receipts, and menus – dating back to the first day of the 2018-2019 school year to recreate the missing production records. Invoices and receipts are only useful if a menu is also provided. Fiscal Action will be assessed for the month of review if no menu is provided.
- b. Regardless of the previous finding, #4a, please send a week of the food service directors choice, of completed production records for both breakfast and lunch showing all required

information is filled out, please refer to the [Must Have, Nice to Have List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>).

Menu Planning Worksheet

A weekly menu planning worksheet can be a useful resource for a food service director. The worksheets help to ensure all meal components and vegetable sub groups are offered in the proper amounts.

☐ Meal Pattern Finding #5: Potential missing components and sub groups.

Corrective Action Needed: Please submit a menu planning worksheet for Lunch for each age/grade group listed below for the *week of review (November 12-16, 2018)*, showing that all quantities will be met. One for each K-8 and 9-12 for lunch and breakfast each day. Please refer to the following:

[Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) for daily and weekly requirements

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>).

- Please fill out a Menu Planning Worksheet for K-8 Lunch for the week of review (November 12-16, 2018): [K-8 Lunch Menu Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-8.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-8.doc>)
- Please fill out a Menu Planning Worksheet for 9-12 Lunch for the week of review (November 12-16, 2018): [9-12 Lunch Menu Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-9-12.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-9-12.doc>)

Standardized Recipes

Standardized recipes needed for menu planning to ensure that the portions offered are actually what is intended. Please use our [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage to aid in this process (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). There is a [Standardized Recipe Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf) to include all parts of a standardized recipe, calculators to assist with nutrient analysis, and a template to organize the information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf>). The recipe standardization process make take several times producing the menu item to make sure it comes out the same way. This requires organized record keeping throughout the process.

☐ Meal Pattern Finding #6: Recipes used during the review week lacked pieces of information necessary for standardized recipes.

Corrective Action Needed: Please updated standardized recipes for:

- Chicken Alfredo – served on Monday 11.12.18
- Sloppy Joe Sandwiches – served on Tuesday 11.13.18
- Rice and Lamb – served on Wednesday 11.14.18
- Nachos – served on Thursday 11.15.18
- CMS House Salad – served on Monday 11.12.18 and Friday 11.16.18

Documentation

Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served.

☐ Meal Pattern Finding #7: No documentation provided

Corrective Action Needed: Please provided all PFS, ingredient labels, and CN Labels for all products offered during the week of review.

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

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant address financial topics with the Authorized Representative, including the agency's Child Nutrition Program report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- DPI has developed a tracking tool to track revenue and expenses by program. [The Purchase Record/Revenue Template](#) is available as a monthly or yearly version on the [Financial](#) page of the DPI website. It can be found under Budgeting and Cost Control.
- [Expenditure categories](#) for the AFR can be found on the Financial page>Annual Financial Report>Resources.
- Allowable Equipment Expenditures can be found on the [Procurement page](#) and then [Preapproved Equipment List](#).
- 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.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not

to exceed a three month average of operating expenses to remain in compliance with a non-profit status.

- 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” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “nonprogram foods”, report 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, a la carte, and caterings would also be included here.
 - When revenues are recorded from the federal reimbursement payments, 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 an NSLP food expenditure for private schools and a purchased service for public schools.

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.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- 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>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** Annual Financial Report not submitted by deadline of August 31st.
Corrective Action Needed: Please submit the ‘17-‘18 Annual Financial Report with revenues and expenses broken out by program and category. The AFR can be submitted, online, through December 31st. After that date, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update. **Corrected. No further action necessary (except finding #2 below.)**
- ❑ **Finding #2:** Annual Financial Report does not have any revenues or expenses allocated to breakfast and the amount allocated to Equipment needs to be correctly allocated between Equipment and Other.
Corrective Action Needed: Please provide a statement going forward that all nonprogram food expenses and revenues will be broken out from NSLP and allocated to the nonprogram foods line on

the annual financial report. We have a resource on our website to aid you in this [calculation](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf).

- ❑ **Finding #3:** SFA does not have internal controls in place to maintain effective oversight over federal funds and ensure charges to the nonprofit school food service are allowable (2CFR 200.303).
Corrective Action Needed: Please provide a timeline for compliance, including description of staff titles, explaining what internal controls will be implemented. (Separation of duties so that staff members who receive or manage the collection of money are not also involved in the disbursement of funds.)

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)/Compliance Reminders

- 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 costs associated with nonprogram foods, 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 unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx).

$$\frac{\textit{Nonprogram food revenue}}{\textit{Total program and nonprogram revenue}} \geq \frac{\textit{Total nonprogram food costs}}{\textit{Total program and nonprogram food costs}}$$

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf).

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the minimum pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student

reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

Resources

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

Indirect Costs

Comments/Technical Assistance (TA)/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume.
 - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district’s total.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

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

And Justice for All Poster

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

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

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

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>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service

within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.

- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** The incorrect nondiscrimination statement is in use on the public release as well as the section in the handbook referencing USDA Child Nutrition programs.
Corrective Action Required: Please update the handbook nondiscrimination statement as well as the statement used on the Public Release and send the updated version to the reviewer. **Handbook corrected onsite, no further action needed for the handbook.**
- ❑ **Finding #2:** School does not have a procedure for receiving and processing complaints alleging discrimination within USDA school meal programs.
Corrective Action Required: Please provide a timeline for creating a USDA school meal program complaint policy. **Corrected onsite; no further action required.**
- ❑ **Finding #3:** Civil Rights training sign-in sheet not available.
Corrective Action Required: Please ensure all staff directly involved in CNP operation complete the training, sign the sign in sheet and submit the completed sign in sheet to reviewer.

Local Wellness Policy

Comments/Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance 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 the SFA complies with the policy.

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) (<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).

Resources:

- 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).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding:** SFA LWP meets some but not all requirements as stipulated above.
Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule. Please refer to checklist reviewer left onsite.

Professional Standards

Comments/Technical Assistance (TA)/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.

- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](#) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: New Food Service Director Hiring Requirements

Hiring Criteria: New Directors Minimum Requirements (hired after July 1, 2015)

Each SFA must designate at least one staff member as a program director. Program director is the person designated to perform the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, marketing, customer service, nutrition education, and general day to day program management.

SFA Enrollment under 500	SFA Enrollment under 2,499	SFA Enrollment 2,500 – 9,999	SFA Enrollment > 10,000
*High school diploma (or GED) and at least 1 year relevant experience in school nutrition	*High school diploma (or GED) and at least 3 years relevant experience in school nutrition	*Associate degree (or equivalent) with related academic major and at least 2 years of relevant experience in school nutrition	*Bachelor’s degree (or equivalent) in any academic major and at least 5 years experience in school nutrition
In addition, new directors are required to obtain at least 8 hours of food safety training, either not more than 5 years prior to their starting date or completed within 30 days of their start date.			
*Note: These are minimum standards. Reference USDA’s summary of the Professional Standards Final Rule for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/profstandards_flyer.pdf).			

Professional Standards: Training Requirements

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

Annual Training Requirements for All Staff

- Directors: 12 hours

- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action: Professional Standards

- ❑ **Finding:** 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 and submit as part of corrective action.

Water

Comments/Technical Assistance (TA)/Compliance Reminders

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.

For more information and resources on the water requirement, see our [Water Availability webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/water-availability) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/water-availability>).

Food Safety and Storage

Comments/Technical Assistance (TA)/Compliance Reminders

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

Food Safety Inspections

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

Temperatures

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

Food Safety Plans

- The Food Safety Plan was available for review. All temperature logs, calibration logs, and sanitizing solution logs were available for review. Temperatures are to be taken and recorded daily. Logs should be kept for minimum of 6 months.

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. 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>)
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- 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. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf>).
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Storage

- 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)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. Some items were found out of the original packaging and/or open and not date-marked.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

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 during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Missing Food Employee Reporting Agreements.
Corrective Action Needed: Complete all missing agreements. Submit copies of completed agreements as an attachment to assigned DPI Nutrition Program Consultant via email.
- ❑ **Finding #2:** Standard operating procedures (SOPs) are not site-specific.
Corrective Action Needed: Create and/or adapt SOPs and Food Safety manual to reflect site-specific procedures at Clara Mohammed School. Submit updated Food Safety Plan as attachment to assigned DPI Nutrition Program Consultant via email.
- ❑ **Finding #3:** Most recent food safety inspection report is not posted in a publicly visible location.
Corrective Action Needed: Post most recent food safety inspection report in location visible to public. Submit photo of posted report as an attachment to assigned DPI Nutrition Program Consultant via email.

Buy American

Comments/Technical Assistance (TA)/Compliance Reminders

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product. A “Domestic Commodity or Product” is defined as an agricultural commodity or product that is produced or processed in the United States using substantial agricultural commodities that are produced in the United States (products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States).

“Substantial” means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs.

The following information must be recorded on a Buy American Non-Compliant Product List of your choosing:

Note: In reference to the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

1. Date
 2. Name of product
 3. Country of origin
 4. Reason
- a. **Cost analysis** – SFA determined the cost of the domestic product, when compared to the non-domestic product, was above the predetermined allowable cost difference established by the SFA. *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then the SFA will purchase non-domestic product.*
 - b. **Seasonality**- Product(s) is/are not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.) *Ex. Blueberries are not available domestically during the months of December – June*
 - c. **Availability** – Product(s) is/are not available to purchase domestically. *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
 - d. **Substitution** - In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.) *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
 - e. **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.) *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
 - f. **Other** - Please provide a written explanation. *Ex. The SFA received a donation of non-domestic oranges. Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american>). For more information on Buy American exceptions, visit the [Buy American Provision Memos](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos>)

Finding #1: Monitoring of received products is not currently happening.

Corrective Action Needed: Develop a plan to monitor and record all products received that are not products of the US.

Reporting and Recordkeeping

Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. “LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last

fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach Comments/Technical Assistance (TA)/Compliance Reminders

- 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.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. **Even though a summer feeding program is not operated at Clara Mohammed School, USDA requires 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>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action: SBP and SFSP Outreach

- Finding #1:** School Breakfast Outreach is not occurring throughout the school year.
Corrective Action Needed: Please provide a statement of understanding regarding the requirements of school breakfast outreach, also indicating how Clara Mohammed School will comply with requirement.
- Finding #2:** No summer food service outreach was provided to students.
Corrective Action Needed: Please provide a statement that Clara Mohammed School will notify households of how to find the nearest Summer Foodservice Program using the [DPI program finder](#).

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

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

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



With School Nutrition Programs!