

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

School Food Authority: Mother of Good
Counsel Grade School

Review Date(s): March 12-13, 2019

Date of Exit Conference: March 13, 2019

Agency Code: 407196

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 a nominal charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- Wisconsin Team Nutrition is hosting a *Teaming Up to Increase Participation* workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop) webpage (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Mother of Good Counsel Grade 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.

Staff at the Mother of Good Counsel Grade School have a fantastic attitude and genuinely care for the wellbeing of all students. The DPI review team appreciates the positive perspective staff have on utilizing the review team as a resource. We also appreciate staff's willingness to make alterations to meet school meals program regulations. Thank you! The DPI review team is confident that Mother of Good Counsel Grade School will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Meal Counting and Claiming

Commendations:

- ✓ The Power School point of service (POS) system produces accurate counts.
- ✓ Daily counts for NSLP and SBP from the review period accurately reflect the claim for reimbursement.
- ✓ Day of review counts are comparable to the review period.

Technical Assistance:

- The SFA is able to count and claim visiting students. Being a CEP district-wide school, the SFA can simply count that visiting student as they do the enrolled students, so long as a reimbursable meal is served to that student. Whether a student is coming from a Wisconsin school or another state school, the guidance is the same. The student may be counted and claimed along with the other students attending the Wisconsin CEP district-wide school.
- For early dismissal and late arrival days, meals should be served to students if school is in session during typical meal service hours.
- Mother of Good Counsel Grade School utilized a sharing table during breakfast and lunch meal services. During breakfast, students seem to automatically go through the POS as they enter even if they know they do not want breakfast. These students take breakfast and place everything on the sharing table. As shelf-stable items are able to be put back into service, many meals are being recycled. This skews breakfast participation numbers. Students should be encouraged to take breakfast if they are hungry and they should be encouraged to try some of each thing they take.
- Edit Checks are to be reviewed monthly. Daily counts are to be compared to the maximum enrolled and maximum expected (calculated using your school's ADA) number of students.

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ **Finding #1:** The POS for 3K students are taken in the classroom prior to arriving in the cafeteria. POS counts must occur at the point students are taking the meals and in the service area.

Corrective Action Needed: Submit an explanation as to how the 3K POS will be altered so that counts are taken in the cafeteria. Include personnel names and titles.

Resources:

- [CEP visiting students flow chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-visiting-students-flow-chart.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-visiting-students-flow-chart.pdf)
- [CEP Monthly POS Breakfast Count Form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility#monitoring-claiming) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility#monitoring-claiming)
- [CEP Monthly POS Lunch Count Form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility#monitoring-claiming) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility#monitoring-claiming)

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the school nutrition professionals and school personnel of Mother of Good Counsel Grade School (MGC). We appreciate your time and efforts spent preparing for and participating in the onsite review. The school nutrition professionals and school personnel were receptive to feedback, both positive and constructive criticism. Each person we worked with brought valuable experience to the school meals programs and to the school itself. There were signs on the meal service line to show students what was available. The garden bar was colorful, and portion cups of crisp lettuce are available daily. Build Your Own Chicken Patty, offered on the day of review, was well-received by the students! They enjoyed selecting the toppings and condiments for their sandwiches. Please do not hesitate to contact the Public Health Nutritionist (PHN) with questions or concerns.

Technical Assistance and Program Requirement Reminders

Non-Reimbursable Meals

Ten students at MGC selected non-reimbursable meals during breakfast meal observation on Tuesday, March 12. Students left the point of service (POS) with fewer than three food items, including 1/2 cup of fruit, vegetable, or combination. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

Whole Grain-Rich Requirement

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. **Grains that are not WGR cannot credit towards the grain component.** The following grain products are not WGR: Apple Whirls cereal, flour tortillas, buttermilk biscuits, white rice, and homemade rolls (i.e. wiener winks). USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

The terms “wheat” or “made with whole grains” on a product label do not necessarily mean that a product is WGR. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole). Alternatively, crediting documentation in the form of a PFS may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients.

Wiener winks, a classic and popular menu item at MGC, are prepared with non-WGR homemade rolls. The school nutrition professionals do not wish to change the wiener winks, which former and current students love. In order to meet daily and weekly minimum requirements for grain, an additional WGR menu item must be planned, offered, and served with wiener winks (e.g. WGR dinner roll, breadstick, rice, savory or sweet crackers, granola bars, etc.) through school year (SY) 2018-19. Only the WGR menu item will credit towards meal pattern requirements.

Flexibilities Memo

The final rule [Child Nutrition Program Flexibilities for Milk, Whole Grains, and Sodium Requirements \(FNS-2017-0021\)](https://www.federalregister.gov/documents/2018/12/12/2018-26762/child-nutrition-programs-flexibilities-for-milk-whole-grains-and-sodium-requirements) increases menu planning flexibility in the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other federal child nutrition programs effective SY 2019-20 (<https://www.federalregister.gov/documents/2018/12/12/2018-26762/child-nutrition-programs-flexibilities-for-milk-whole-grains-and-sodium-requirements>). Notably, the final rule will require that half (50 percent) of the weekly grains in the NSLP and SBP be WGR, thus ending the need for the exemption process. At the same time, the DPI encourages schools to “keep in mind the best interests of the students and provide our school children with the most healthful and nutritious meals possible.”

School Breakfast Program (SBP)

A granola bar offered for breakfast credits as less than 1.0 ounce equivalent (oz eq) of grain per 0.84 ounce portion. Therefore, a granola bar must be bundled with another grain item so at least 1.0 oz eq of grain is offered each day to meet the daily minimum requirement for grain, and so a granola bar may be counted as an item as part of a reimbursable breakfast.

An item at breakfast is defined as 1.0 oz eq grain, 1.0 oz eq meat/meat alternate, ½ cup of fruit and/or vegetable, or 1 cup of milk. Under Offer versus Serve (OVS) at breakfast, four food items must be offered, and students must select at least three food items, one of which is ½ cup fruit, vegetable, or combination to have a reimbursable meal.

Three food items are required for adequate, nutritious breakfast meals for students and to warrant federal reimbursements. Other than selecting the required minimum ½ cup fruit, vegetable, or combination serving, it is the student’s choice to select or decline a food item, including milk.

Production Records

Per the Permanent Agreement with the DPI School Nutrition Team (SNT), the school food authority (SFA) must maintain accurate production records for all breakfast and lunch meals claimed for reimbursement. Production records are required to document that foods meeting meal pattern requirements were planned, offered, and 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. Menu planning worksheets do not meet the production record

requirements per the “[Must Haves and Nice to Haves](#)” list (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). The following information must be corrected to meet the production record requirements:

- Serving site
- Menu item **with recipe name/reference number or product name/description**
- Planned/actual number of servings prepared
- Planned/actual quantity prepared in purchase units
- Amount leftover
- Milk usage by type
- Planned serving size and usage for condiments and any extra menu items
- Number of reimbursable and non-reimbursable (adult) meals planned and served
- Substitutions made to original plans
- Substitutions made for students with special dietary needs

While there is no required production record template, there are some examples that may be used on the [Production Records webpage](#). A PDF and a Microsoft Excel file will be emailed to the food service director for consideration.

Be specific about the identity, brand, and description of the items served. Generic descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records to accurately reflect portion sizes and crediting.

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. Use volume measures (such as cups) to record portion sizes of fruits, vegetables, and milk, and use weight measures (such as ounces or grams) to record portion sizes of meat/meat alternates and grains.

Standardized Recipes

A standardized recipe 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. Use the resources on the [Standardized Recipes webpage](#), including 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](#) (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>). The PHN also encourages viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>). Recipes for mixed greens, taco meat, rice, and wiener winks are not standardized to the operation.

Fruit Cups

According to guidance from the USDA Midwest Regional Office, manufacturers are allowed to declare volume measurements contained in fruit cups as a means of crediting information (i.e. 3/8 cup of mandarin oranges and 1/8 cup of 100% fruit juice). Additional documentation must be provided.

Manufacturers are also allowed to provide in-house yield data. School food authorities shall measure the contents of fruit cups to ensure they obtain the same volume measurements declared by the manufacturers. Reference the [Tips for Accepting Processed Product Documentation PDF](#) on the Menu Planning webpage for steps to verifying the accuracy of information on a PFS (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/tipsheet_processedproduct.pdf).

Sodium

In November 2017, an interim final rule was published that continues the Sodium Target 1 through the school year (SY) 2018-19. USDA recognizes that even though great progress has been made, schools and industry expressed the need for additional time and assistance to effectively achieve changes in the school meal patterns, including those related to sodium. At the same time, the WI DPI encourages schools to “keep in mind the best interests of the students and provide our school children with the most healthful and nutritious meals possible.” Products that can be major contributors of sodium include condiments, regular canned vegetables, regular canned soups, dairy products, and processed food items.

Addressing Hunger

According to [The School Day Just Got Healthier Fact Sheet: Calories in School Meals](#), 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](#) 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.

MGC has a sharing table. During breakfast meal service, the sharing table was piled high with assorted cereals, fruit cups, and milk cartons. Please ensure OVS is effectively implemented. This includes training and supervising school nutrition professionals, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage. Evaluate the popularity and acceptability of current menu items. Reduce or remove unpopular or unacceptable items from the menu. Remember, only non-time/temperature control for safety (TCS) food items may be re-served in child nutrition programs. TCS foods include milk, cheese, and yogurt, among many other food items.

Child and Adult Care Food Program (CACFP)

Updated Meal Pattern

The updated CACFP meal pattern was implemented on October 1, 2017, replacing the previous meal

pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). For questions about the updated CACFP meal pattern, please contact our specialists: Tanya Kirtz at Tanya.Kirtz@dpi.wi.gov or Erin Opgenorth at Erin.Opgenorth@dpi.wi.gov.

Co-mingling Flexibility

Under the co-mingling flexibility from the USDA, preschool students may be served the breakfast and lunch meal patterns for age/grade group K-8 if they are served at the same time **and** in the same place. This flexibility may be used in situations when would be challenging for staff to determine during meal service if a child is in preschool or K-8. Children who are not yet in kindergarten must be served the updated CACFP meal pattern if not co-mingled with other age/grade groups at meals.

Offer Versus Serve (OVS)

OVS is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service.

Milk Types

Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk may not be served. Children one year old should be served unflavored whole milk. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. The Smarter Lunchrooms Movement has strategies to [encourage the consumption of unflavored milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Grain-based Desserts

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is thought of as a dessert or treat. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

Sugar in Cereals

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. The Cocoa Puffs cereal was above the sugar limit for the serving size and was discontinued for pre-kindergarten students.

To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for

sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements. Sugar limit charts, calculation examples, and cereals that meet the sugar requirements are posted on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Communications

Anyone involved with the USDA School Meal Programs may send an email to join-schoolmealsnews@lists.dpi.wi.gov to directly receive important School Nutrition program updates from the DPI. Additionally, the SNT Training Team hosts the [What's New with School Nutrition Webinar](#) on the second Tuesday of each month from 2:00 PM to 3:00 PM via Skype Meeting (<https://dpi.wi.gov/school-nutrition/training/whats-new>).

Training

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin DPI SNT trainings. These are offered in the summer and select other times throughout the year. Courses provide overviews of all areas of the NSLP and SBP requirements including meal pattern, OVS, and CACFP. Travel and meals are allowable expenses to the nonprofit food service account.

The 2019 School Nutrition Skills Development Courses (SNSDC) dates and locations have been released:

- Appleton (Fox Valley Technical College): July 16-18, 2019
- Milwaukee (Alverno College): July 23-25, 2019
- Rice Lake (Wisconsin Indianhead Technical College): July 30-August 1, 2019
- Middleton (Kromrey Middle School): August 6-8, 2019
- Wausau (Northcentral Technical College): August 13-15, 2019

Registration and class schedules will be posted to the website in early May. Visit the [Training](#) webpage for more information (<https://dpi.wi.gov/school-nutrition/training#up>).

Offer versus Serve (OVS)

School nutrition professionals may benefit from additional OVS training. The [Offer Versus Serve Guidance manual](#) and the [Offer Versus Serve webcast](#) may 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>). Additionally, [Meal or No Meal](#), a training resource inspired by a game show, may be used for staff determining reimbursable meals (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx>). Practice OVS in the context of MGC's planned menus.

Small Victories (SV)

SV training is designed to celebrate the unique environment that is specific to schools with small student enrollments. The tools found on the [SV webpage](#) are meant to assist foodservice professionals working in small schools as they create their own *Small Victories*. Attending in-person trainings and watching available webcasts count toward [GOALS requirements](#) (<https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>).

Corrective Action

Meal Pattern Finding #2: Ten students at MGC selected non-reimbursable meals during breakfast meal observation on Tuesday, March 12. Students left the point of service (POS) with fewer than three food items, including 1/2 cup of fruit, vegetable, or combination. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

Required Corrective Action: Submit two to three sentences describing how selection of non-reimbursable meals will be corrected and avoided in the future.

Meal Pattern Finding #3: Daily and weekly minimum requirements for fruit were not met for breakfast during the review period. The following represent the portion sizes planned, offered, and served during the review period:

- Monday: 1/2 cup of peaches
- Tuesday: 1/2 cup of mandarin oranges
- Wednesday: 1/2 cup of banana (1 each)
- Thursday: 1/2 cup of pears
- Friday: 1/2 cup of applesauce
- Total: 2 1/2 cups of fruit

The daily and weekly minimum requirements for age/grade group K-8 are 1 cup and 5 cups, respectively. **This is a repeat finding, subject to fiscal action.**

Required Corrective Action: Please refer to the corrective action under Meal Pattern Finding #4.

Meal Pattern Finding #4: Menu planning worksheets do not meet the production record requirements.

Required Corrective Action: Submit two weeks (ten days) of completed production records for breakfast and for lunch. Select production records you are confident are filled in accurately and completely.

Meal Pattern Finding #5: Apple Whirls cereal, flour tortillas, buttermilk biscuits, white rice, and homemade rolls (i.e. wiener winks) are not whole grain-rich products.

Required Corrective Action: Submit crediting documentation (e.g. CN label, PFS, complete nutrition facts label with ingredient statement) or standardized recipes for replacement or additional products, as applicable. Please refer to Whole Grain-Rich Requirements (above) for more information.

Meal Pattern Finding #6: Recipes for mixed greens, taco meat, rice, and wiener winks are not standardized to the operation.

Required Corrective Action: Submit standardized recipes for these menu items, including serving size for single portion(s), total number of portions, and total volume or measure.

Meal Pattern Finding #7: Inappropriate implementation of OVS.

Required Corrective Action: Watch the [Offer Versus Serve webcast](#) (<https://dpi.wi.gov/schoolnutrition/training/webcasts#ovs>) and the [Get the Scoop on](#)

[Breakfast: Part 2 \(Offer versus Serve\) webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#sbp) (https://dpi.wi.gov/school-nutrition/training/webcasts#sbp) on the SNT [Training webpage](https://dpi.wi.gov/school-nutrition/training) (https://dpi.wi.gov/school-nutrition/training). Submit certificates of completion for the school nutrition professionals.

Smart Snacks

At the time of the on-site review there were no competitive foods or beverages sold in vending machines, school stores, snack or coffee bars, concession stands, or fundraisers at MGC during the school day. The school day is defined as 12 AM on the day of instruction to 30 minutes after the end of the official school day. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

3. RESOURCE MANAGEMENT

Non-profit School Food Service Account

Commendations:

- ✓ All costs to the non-profit food service account are allowable.
- ✓ Indirect costs were not charged.

Technical Assistance:

- **The entitlement value of USDA Foods (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP. Any handling and processing fees must be recorded as a School Purchased Services Expenditure.**
 - 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 webpage](https://dpi.wi.gov/nutrition/online-services) (dpi.wi.gov/nutrition/online-services).
- Utility charges to the food service account are allowable so long as they are assessed appropriately. The two ways in which utilities may be assessed are to be separately metered or a current usage study by the local utility company.

Findings and Corrective Action Needed: Non-profit School Food Service Account

Finding #8: The food service account ledger and journal entries are appropriately organized by the business manager. The food service director then enters the amounts into the Annual Financial Report (AFR) by August 31. However, the AFR did not report expenditures by program (all under NSLP).

Corrective Action Needed: Please complete the AFR webcast listed under *Resources* and submit the quiz completion email confirmation to the consultant assigned to your review. Submit an explanation as to how expenses will be separated out by program going forward.

❑ **Finding #9:** It was unclear if funds from the non-profit school food service account or from the Extended Care Program (ECP) were used to purchase Afterschool Snack Program (ASP) snacks. The school food service account receives reimbursement while ECP purchases and administers the snacks to students after school.

Corrective Action Needed: Please submit an explanation identifying the account funding the ASP.

Resources:

- [USDA Foods webpage](https://dpi.wi.gov/school-nutrition/usda) with USDA Foods team contact information (https://dpi.wi.gov/school-nutrition/usda)
- [AFR webcast](https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story_html5.html)
- [AFR instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf)
- [AFR In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx)

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

- ✓ The Civil Rights Self-Compliance form (PI-1441) was completed.
- ✓ The annual Civil Rights training was completed.
- ✓ The CEP Public Release was sent out at the beginning of the school year.

Technical Assistance:

- Ensure there are signatures on the PI-1441 form and Civil Rights training attendance log.
- **All program materials and information that is made public (posted, sent to households) must contain the USDA Non-Discrimination Statement.** There is a shortened version available if the longer version does not fit on program materials: ***This institution is an equal opportunity provider.***
 - This statement's font size cannot be smaller than the smallest font on the existing document.

Civil Rights Complaint Procedures:

- 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 five days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures in place for handling civil rights complaints in regard 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)
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Findings and Corrective Action Needed: Civil Rights

Finding #10: The following documents do not contain the most current non-discrimination statement: lunch, breakfast, and snack menus, and the LWP.

Corrective Action Needed: Please update these documents and send them to the consultant assigned to your review.

Resources:

- [USDA Non-Discrimination Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>)

Local Wellness Policy

Commendations:

Many great and specific wellness goals!

Professional Standards

Commendations:

- Professional Standards training hours are tracked by food service staff. Thank you!

Technical Assistance:

- The Professional Standards trackers (manual or electronic) must include the following information:
 - Employee Name
 - Date of Hire
 - Position
 - Reporting Period (e.g. July 1, 201X – June 30, 201Y)
 - Total Training Hour Requirement
 - 12 hours (Director)
 - 10 hours (Manager)
 - 6 hour (full-time Staff) (i.e. more than 20 hours/week)
 - 4 hours (part-time Staff) (i.e. less than 20 hours/week)

Findings and Corrective Action Needed: Professional Standards

Finding #11: As the ECP coordinator manages most aspects of the ASP, she is required to complete and track four hours of training annually. Food safety and civil

rights are required. All other trainings must be job-specific. Please see Category 2 within the *Professional Standards Training Requirements* resource below.

Corrective Action Needed: Please submit a training plan for the ECP coordinator that includes planned trainings' titles and expected completion dates.

Resources:

- [Professional Standards webpage](https://dpi.wi.gov/school-nutrition/professional-standards)(https://dpi.wi.gov/school-nutrition/professional-standards)
- [Professional Standards In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf)
- [Professional Standards Training Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf)
- [DPI SNT Professional Standards Training Tracker](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx)

Food Safety and Storage

Commendations:

- ✓ Two food safety inspections were completed in the prior school year.
- ✓ The most current inspection is publicly posted in the service area.
- ✓ Food Safety Plan for Mother of Good Counsel School is on site.

Technical Assistance:

- The Food Safety Plan is to be site-specific and is to be updated and reviewed each school year. The current plan and some of its requirements are not readily available and appear to be infrequently referenced. This plan houses all important food safety information regarding the food service operations and how employee illnesses will be handled. If Mother of Good Counsel School has specific food safety plan questions or concerns, please contact your local sanitarian (i.e. the individual conducting food safety inspections).
- **Milks on sharing tables cannot be put back into service.** Milks held in or on a cooling mechanism may be donated to local food banks, but cannot be put back into service.
- **The school meals program operations would benefit from a kitchen use policy as the use of the kitchen in the summer months poses food safety concerns.**

Findings and Corrective Action Needed: Food Safety and Storage

Finding #12: An Afterschool Snack Program (ASP) Standard Operating Procedure (SOP) for food service staff is not included in the Food Safety Plan.

Corrective Action Needed: Please utilize the ASP SOP template (under *Resources*), tailor it to the SFA's operations, and have it approved by your local sanitarian. Submit this to the consultant assigned to your review.

Finding #13: It was observed that food within the freezer was being stored directly on the floor. Food safety requirements indicate a six-inch gap be between the floor and food storage.

Corrective Action Needed: Please submit a statement of understanding that food cannot be stored directly on the floor.

Resources:

- [ASP SOP template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/afterschool-snack-sop.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/afterschool-snack-sop.doc)

Reporting and Recordkeeping

Commendations:

- ✓ The VCR, PLP report, FNS-10 report, and AFR were all submitted. Thank you!
- ✓ Documents are maintained on file for the required three years plus the current school year.

Technical Assistance:

- Temperature logs only need to be maintained for a minimum of six months. All other documents related to the school meals programs are to be maintained for three years plus the current school year.

Findings and Corrective Action Needed: Reporting and Recordkeeping

Finding #14: Temperature logs are not on file for the past six months.

Corrective Action Needed: Please submit the temperature logs for September 2018 through March 2019 or submit a statement of compliance stating that temperature logs will be kept for the minimum six month requirements going forward.

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

Commendations:

- ✓ SFSP and SBP outreach have been completed. Thank you!

Compliance Reminders:

- SBP outreach must be completed at the beginning of the school year and SFSP outreach must be completed prior to the end of the academic school year.
- A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, **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 webpage](http://www.fns.usda.gov/summerfoodrocks) (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

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snack Program (ASP)

Commendations:

- ✓ Enrichment activities are offered with ASP service.
- ✓ The ECP coordinator does a wonderful job facilitating ASP.

Technical Assistance:

- When comparing the review period's claim for reimbursement, the SFA looks to have under claimed three snacks. Going forward, ensure snacks counts are reported accurately.
- According to the 1.75 oz. Chex Mix product itself, it is not whole grain rich. When looking at the product information sheet, the Chex Mix is not whole grain rich.

Findings and Corrective Action Needed: Afterschool Snack Program (ASP)

Finding #15: The ASP on-site monitoring form was not completed. This is to be completed annually within the first four week of snack service. As the Extended Care Program (ECP) purchases, administers, counts, and claims snacks for ASP, it is recommended that the food service director complete the annual ASP On-site Monitoring Form.

Corrective Action Needed: Please complete this form (under *Resources*) and send to the consultant assigned to the review.

Finding #16: The following snacks are not whole-grain rich: Grandma's Cookies, Check Mix, Cheez-it Crackers, and Rold Gold Pretzels.

Corrective Action Needed: Send along replacement products' information that are whole grain rich to the consultant assigned to the review.

❑ **Finding #17:** Juice must be served to students ages 6-12 must be in 6 oz. portions. Currently, the SFA uses 6 oz. cups, so when the juice was offered, students are actually receiving 3-4 oz. juice as juice is not filled to the brim of the 6 oz. cups. Larger juice cups (8-12 oz.) are needed for the 6 oz. juice requirements for 6-12 year olds.

Corrective Action Needed: Please submit an explanation from the ECP coordinator explaining how this will be corrected.

❑ **Finding #18:** The ASP POS is currently at three different points with three teachers. After speaking with the ECP coordinator, it is possible to condense the POS to one point. This is important as each teacher had a different understanding of the ASP snack requirements. So one POS point for ASP is required to ensure accurate snack counts.

Corrective Action Needed: Please submit an explanation from the ECP coordinator explaining how the POS will be condensed to one point.

Resources:

- [ASP On-site Monitoring Form](https://dpi.wi.gov/school-nutrition/after-school) (https://dpi.wi.gov/school-nutrition/after-school)
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6. COMMUNITY ELIGIBILITY PROVISION (CEP)

Commendations:

- ✓ CEP ISP documentation is on file.
- ✓ The October DC run was completed for this school year.
- ✓ Income information (from alternate applications and DC runs) is gathered at the SFA.

Technical Assistance:

- ✓ Mother of Good Counsel School is currently in cycle year 2 for CEP (cycle year 1 was school year 17-18). The online contract lists the SFA as in cycle year 1. Please accurately report CEP cycle years in the online contract going forward.
- ✓ CEP district-wide SFAs cannot collect F/R meal applications to gather income information. Please use the alternate application (under *Resources*) going forward.

Compliance Reminders:

- For CEP district-wide SFAs, DC is only required to be run in October (for reporting purposes) and on April 1 (for the CEP Annual Intent Form).

Resources:

- [Alternate Income Application for CEP district-wide schools](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/alternate-household-income-form.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/alternate-household-income-form.docx)
 - [CEP Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf)
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“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).”



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