

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

School Food Authority: Nativity Jesuit Academy

Agency Code: 407204

School(s) Reviewed: Nativity Jesuit Middle School (single site)

Review Date(s): 3/26–3/28/18

Date of Exit Conference: 3/28/18

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Nativity Jesuit Academy for the courtesies extended during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet school nutrition program regulations.

The DPI review team is confident that staff at Nativity Jesuit Academy will continue to improve their knowledge and operation of child nutrition programs. The administrative officials with roles in the program has taken time to attend DPI trainings and continue learning about the pieces of the programs.

The meal service staff maintain a clean and organized kitchen. The servers are attentive to food safety and provide high quality customer service to the students. Additionally, the servers took care to provide a welcoming meal environment and answer questions for the review.

The teachers that assist with scanning students at the point of sale work efficiently together and have positive interactions with the students. It was clear during meal observation that students have been educated by the staff members about coming through the service line politely and in an organized fashion.

The nutrition programs operated at the SFA are functioning well and provide students with healthy, attractive meals. The SFA recently began participating in the NSLP and SBP programs, and it is clear that the staff are dedicated to continuing to improve the programs and learn about program requirements.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- The SFA does an excellent job providing all program materials in both English and Spanish to best meet the needs of the population served. Additionally, the SFA utilizes DPI template letters for communications with households which ensures letter requirements are met.

Technical Assistance:

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.

Income Frequency:

- When an application has multiple income frequencies listed, the income should be annualized before a determination is made. On the other hand, when an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual or monthly, but instead use the [Income Eligibility Guidelines](#) to look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice

monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file. While the benefits issuance list provided showed effective dates that were inconsistent with the output files, the Determining Official's explanation was acceptable. DC run outputs are transferred from the authorized representative to the Determining Official, who then manually enters the benefits into Powerschool, as soon as possible. The Determining Official then manually backdates the benefit for meals served to the eligible students between the time of the run and the time of entry into Powerschool. This process ensures that students receive the appropriate benefit as of the date the DC is run and output.

Disclosure

- The SFA currently does not share any free/reduced meal benefit information with any reasons other than those pertaining directly to the school nutrition programs. However, disclosure and sharing of information may be a topic of concern if meal benefit information is requested for other purposes in the future.
- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Carry Over

- The eligibility determination process used at Nativity Jesuit Academy minimizes the need for use of carryover, because of the efforts to establish eligibility for each student prior to the start of the school year. However, please remember that students must have their free/reduced meal benefits carried over into the following school year for 30 operating days or until a new eligibility determination is made—whichever comes first.

Community Eligibility Provision (CEP)

- The option for CEP was discussed with the SFA. While the SFA does not currently operate CEP, this may be a desirable option for upcoming school years. The free/reduced information reviewed suggest that the SFA may qualify and benefit from operating CEP. Please visit the [CEP webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) for application information (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility).
- Applying for and transitioning to CEP will eliminate the need for application collection and processing, eliminate verification, could increase meal participation, reduces concern over unpaid meals, could increase reimbursements, and may ease financial stress on households.

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. Source documentation may include a copy of the original application or a copy of a DC run with the student's name listed. A phone call or copy of a benefit approval letter are examples of documentation that would not be sufficient to establish the new or transfer student's eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding A:** Of the 155 eligibility determinations reviewed, two application errors were identified and affected three students. On both applications, household income was incorrectly calculated and free meals benefits were improperly awarded when reduced price meal benefits should have been awarded.

Corrective Action Needed for Finding A: Send customized adverse action letters to the two households affected by these errors to notify families of their change from free to reduced benefits in 10 calendar days. Update the benefit issuance system on the 10th calendar day to reflect each students' new reduced price meal benefit status. Submit copies of the adverse action letters to the consultant. Corrected on-site; no further action required.

☐ **Finding B:** All incomes on applications were calculated and converted into monthly incomes. While this only resulted in the two application errors described in Finding A, this practice does not provide the most accurate income calculation to compare to the Income Eligibility Guidelines. Discussions with the Determining Official indicated that monthly income was calculated in this way because the meal section of Powerschool only allows monthly income to be entered to determine benefit status automatically.

Corrective Action Needed for Finding B: Discontinue the practice of converting all incomes reported on applications to monthly incomes for entry into Powerschool. Calculate incomes on applications

based on the frequencies they were reported or annualized when multiple income frequencies are provided as described above under “Income Frequency.” Individual benefit statuses must be manually entered into Powerschool based on the Determining Official’s eligibility determination, as opposed to allowing Powerschool automatically determine eligibility based on monthly income entered. Provide a statement of understanding that this procedure for income calculations and benefit entry into Powerschool will be followed going forward.

Verification

Technical Assistance:

- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- As a reminder, paychecks are not acceptable forms of documentation for verification. Paychecks represent net income (take-home pay) and do not represent the gross income that must be reported on applications. If paychecks are submitted by households for verification documentation, the Verifying Official must request alternative documentation that shows gross income (such as a pay stub).
- As a reminder, adjusted gross income reported on tax forms is not an acceptable form of documentation for verification. Adjusted gross income may not reflect some deductions that could have been taken out of actual gross income earned.
- When households submit pay stubs as part of the verification process, the gross income amount and frequency of payments must be verified and compared to the income amounts and frequencies listed on the original application. If an income frequency is unclear or not listed on a submitted pay stub, the Verifying Official must contact the family for clarification before proceeding with the verification process.
- Verification must be completed by November 15th, including making any benefit changes that result from the verification process. The SFA did not have the verification process completed by the deadline.
- Selection of applications for verification must be completed in accordance with the selected sample size. The SFA was not required to use Standard Sampling, but elected to do so. However, two of the applications selected for verification were not error prone. As a reminder, error prone applications are those on which monthly incomes are within \$100 per month or \$1200 per year of the applicable Income Eligibility Guidelines. Alternate 1 sample size may be a more desirable choice in the future because it does not require selection of error prone applications.
- The SFA over-verified by one application due to a misunderstanding of verification guidance provided in the Eligibility Manual. Technical assistance was provided to prevent future over-verification.

Findings and Corrective Action Needed: Verification

- Finding C:** Due to errors described in Technical Assistance (including late completion of verification, unacceptable income documentation, and section 4 VCR errors, incorrect timeframes for benefit changes), additional training for the Verification Official is needed.

Corrective Action Needed for Finding C: If the SFA will continue to operate the standard meal benefit and meal counting/claiming processes (as opposed to CEP), the Verifying Official must complete the

[Verification webcast](#) prior to the start of the next school year. If the SFA transitions to CEP for the following school year, the verification process will be eliminated and thus the Verifying Official will not need additional training on this topic. Please provide a written plan describing how training for the Verifying Official will be handled for the next school year and going forward.

Meal Counting and Claiming

Commendations:

- The counting/claiming system appears to be highly effective. The teachers in charge of scanning students at the end of the line point of sale take care to ensure each student has a reimbursable meal and that each student is scanned in to the computer. The set up functions on the computer screen at the point of sale adequately prevents overt identification of free/reduced students.
- The procedures used to verify meal counts using edit checks and to submit claims appears accurate and compliant with all regulations.
- The SFA has procedures in place to offer field trip meals to students when their trips cause them to miss lunch at school. It is excellent that this service is offered to ensure students have access to nutritious meals on field trip days.

Technical Assistance:

Operating Days

- The lunch and breakfast claims submitted for the review period contained the incorrect number of operating days. The operating days listed on the claim must reflect the number of days in the month that meals were served. The number of operating days may be different for breakfast and lunch since breakfast is served on the monthly early release Friday, but lunch is not. The operating days should not include any days that school was in session but meals were not served, or any days that school was not in session (such as for a snow day or other emergency closing). Ensuring that the operating days are accurate on the claim allows the internal edit check in the claiming system to function effectively and verify that the number of meals claimed is reasonable for the month. Despite this error, it is clear that the edit check process used by the Claim Preparer is accurate and that the correct number of meals are being claimed in each category monthly.

Field Trip Meals

- Although the field trip meals have yet to be served due to a lack of need thus far, there are some important considerations involving the point of sale for these meals. Teachers responsible for checking students off for their field trip meals must check off each student when they take the meal. It is not acceptable to check off every student that orders a meal and then uncheck any student that did not take a meal. Please ensure that teachers are aware of the correct way to count field trip meals served so that the claim for reimbursement is accurate.
- DPI has created [Field Trip meal resources](#) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Severe Need Breakfast

- Because the current school year is the SFA's second year in the child nutrition programs, severe need breakfast was not an option for the current school year. However, for the next school year the SFA will have adequate lunch participation records from the second preceding school year (SY 16-17) to assess eligibility for severe need breakfast. Please visit the [Severe Need Breakfast webpage](#) for more information about severe need breakfast eligibility (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/severe-need-breakfast>).
-

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Thank you to all staff at Nativity Jesuit Academy for the warm welcome and cooperation during this Administrative Review (AR). The kitchen and service areas were clean and well-organized and staff were willing to answer questions. Great job to Gourmet Gorilla for creating diverse menus with from-scratch, fresh, healthy and even vegetarian recipes. The menus offer a wide variety of fruits and vegetables like honeydew melon, cantaloupe, edamame, and black bean salsa. Meal pattern was in compliance with perfect breakfast and lunch weeks of review. Thank you for serving healthy, nutritious meals to the students of Nativity Jesuit Academy!

Technical Assistance:

Training

- Anyone involved with the United States Department of Agriculture (USDA) School Meal Programs is encouraged to attend 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 and reduced meal applications, meal pattern, special dietary needs, and record keeping requirements. Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (<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 [Webcast Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Breakfast - Recipes, Whole Fruit

- If it becomes too time- or labor-intensive to record the whole fruit offered at breakfast (e.g. whole apple, whole pear, banana, etc.) usage by type on production records, consider creating a recipe. Individual recipes document average whole fruit usage by meal and grade group. When a whole fruit breakfast recipe is on file, total usage must still be recorded on production records. Recipes must be updated twice per year or when students' preferences change.

Offer versus Serve (OVS)

- OVS is not being properly implemented at breakfast. Students are served pre-plated meals with the entree and one fruit choice rather than being allowed to decline certain options. Although no non-reimbursable meals were observed, and students still had the option to decline an additional fruit or a milk, consider leaving the main entree off of some trays to give students a choice (i.e. a student could select ½ cup honeydew melon, 1 cup pear, and a milk for a reimbursable meal, declining the banana muffin). 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.

Printed Menu

- The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal.

Crediting

- A few items were credited incorrectly on production records during the week of review. The Apple Cinnamon Bar, which credits as 1 oz. eq. Grain (per the recipe and product formulation statement), was written on production records as 1.5 oz. eq. grain. The onion/pepper blend was credited as ½ cup red/orange vegetable, however no crediting information from the manufacturer stating the breakdowns of vegetable subgroups was submitted. Any pre-purchased, combination vegetable product that contains different subgroups (excluding "starchy") will be credited toward the "other" vegetable subgroup. Make sure these are updated on the production records.

Child and Adult Care Food Program (CACFP)

Technical Assistance: CACFP

- The updated Child and Adult Care Food Program (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. If pre-kindergarten (pre-K) students are not commingled with other grade groups, then they must follow the new CACFP meal pattern. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans and 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>).
- The new Meal Pattern Charts for the CACFP meal pattern can be found on [USDA's CACFP](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf) webpage (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf).

Offer versus Serve (OVS) in CACFP

- Offer Versus Serve (OVS) is not an appropriate service style for 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 developing food preferences. Instead, pre-K students should be served all the required components in at least the minimum amounts at each meal or, implement family style meal service. When using family style meal service, a sufficient amount of prepared food must be placed on each table to provide the full required portions of each of the food components for all children at the table, and to accommodate supervising adults if they eat with the children. Family style meal service allows children to make choices in selecting foods and the size of initial servings. Children should initially be offered the full required portion of each meal component. Supervising adults should actively encourage (but not force) children to try components and accept full portions during the meal. If a child refuses to take one or more food components, he or she should be offered that food again before the meal is finished.
- Training resources on family style meals may be found on SNT's [Infant and Preschool in NSLP](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>).

Sugar in Cereal

- 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. 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. For more information, including the sugar limit charts, calculation examples, and cereals that meet the sugar requirements, please refer to 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>).

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. Items with names such as "breakfast rounds" resemble grain-based desserts and are not a creditable grain. Homemade items and desserts made with whole grains or more nutritious ingredients like black

beans/applesauce/vegetable puree are considered grain-based desserts and do not credit toward the grains component. 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>).

M/MA at Breakfast for Grains

- A meat/meat alternate may be used to meet the entire grains requirement up to three times per week at breakfast. Beyond that, a meat/meat alternate may be served in addition to the full grains component and should be counted as an extra food during those meals.

Contact Information

- 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.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ✓ There were no findings and corrective action for the Meal Pattern and Nutritional Quality section of this Administrative Review.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations:

- The unpaid meal charge policy is provided in the school handbook, which is an excellent way to communicate the policy with all households.
- The Annual Financial Report had expenses and revenues broken out by each program appropriately. Transfers from non-federal sources were noted on the report and explained sufficiently by the business manager.
- The accounting system in place to track and manage food service revenues/expenditures appears appropriate, accurate, and reliable.

Technical Assistance:

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed](#)

- [property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).
- 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](#) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Annual Financial Report

- It is recommended for the business manager and food service director to review the resources on the [Financial Management webpage](#) prior to completion of the report for the current school year. While there were not obvious errors in the report, reviewing these resources will help ensure the report is completed thoroughly and accurately.

Paid Lunch Equity (PLE)

Technical Assistance:

- The PLE tool was correctly completed for the current school year and the SFA was above the required equity price. The SFA's current weighted average for 2017-18 SY tool is \$3.00.
- If the SFA continues to operate using standard counting/claiming by benefit category for the next school year (as opposed to CEP), the PLE tool will need to be completed and uploaded to the online contract.
- Step by step instructions to completing the PLE tool can be found on the [DP Financial Management webpage](#) under Paid Lunch Equity (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Revenue from Non-Program Foods

Technical Assistance:

- The SFA does not currently sell any non-program foods including adult meals, extra milk, or extra entrees. If the SFA begins selling non-program foods in the future, please be sure to reference the non-program foods section of the [Financial Management webpage](#) for resources and compliance information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- The online contract currently has adult meal prices listed that meet adult meal pricing requirements. If the SFA begins selling adult meals, the prices listed on the contract must be charged at minimum.

Indirect Costs

Technical Assistance:

- While there have not been issues with the SFA charging indirect costs to foodservice, the information below is a reminder about indirect cost guidelines.
- 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

Technical Assistance:

Non-Discrimination 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. See corrective action below.
- While the SFA does not currently have a food service page on the school website, if a food service page is added it must include the full USDA non-discrimination statement or an obvious link to the full statement.

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. See corrective action below.

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. Be 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).

- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](#) resource.

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.

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 meals 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 the public release contains the entire income eligibility guidelines grid, it should not be sent to households, printed in handbooks, or posted to the school website. Limiting access to the full income eligibility guidelines helps prevent abuse of this information on free/reduced applications.

Findings and Corrective Action Needed: Civil Rights

❑ **Finding D:** The incorrect version of the public release was used for the current school year, and was only sent to a grassroots organization.

Corrective Action Needed for Finding D: Provide a written plan describing how the correct public release will be used for upcoming school years. Include a list of media outlets and grassroots organizations that the public release will be sent to in the future.

❑ **Finding E:** The public release is currently posted on the school's website. The public release must not be posted to the school's website because it contains the free and reduced meal benefit income eligibility guidelines.

Corrective Action Needed for Finding E: Please remove the public release from the website, and do not post the public release on the website going forward. Notify the consultant when the public release has been removed.

❑ **Finding F:** The breakfast and lunch menus do not contain the shortened non-discrimination statement.

Corrective Action Needed for Finding F: Please work with the meal vendor to ensure all menus contain the shortened non-discrimination statement: "*This institution is an equal opportunity provider.*" Email the consultant a copy of the updated breakfast and lunch menus.

❑ **Finding G:** The business manager is responsible for financial management of the nutrition programs, including completion of the annual financial report, and thus must complete annual civil rights training.

Corrective Action Needed for Finding G: Email the consultant when the business manager has completed the civil rights training.

Local Wellness Policy

Commendations:

- The local wellness policy (LWP) contains all required content. Great job creating a comprehensive policy that meets all content requirements!

Technical Assistance:

Wellness Policy Final Rule

- 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.

Wellness Committee Stakeholders

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of 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>).

Triennial Assessment

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place.
- To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.
- Additionally, the SFA is required to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

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>). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding H:** The LWP is not available to the public.

Corrective Action Required for Finding H: Provide a timeline outlining when and how the LWP will be made available to the public. If the policy will be posted on the school website, it must be accessible to anyone visiting the site and not posted only in the parent/student portal which requires a password.

Smart Snacks in Schools

Technical Assistance:

Fundraisers

- While fundraisers are not currently being held at the school, the information below contains reminders about fundraisers involving food/beverages for reference.
 - All foods (vending machines, school stores, fundraisers, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the “Smart Snacks” regulations.
 - The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers are required to be documented. Electronic versions of the fundraiser tracking tools can be found on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
-

Professional Standards

Technical Assistance:

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](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- Within the SFA, the business manager, office manager/determining official/verifying official, and four teachers operating the scanning point of sale station are considered “non-school nutrition staff with duties related to the program.” Assessment of each of these person’s daily duties indicates that four annual training hours are required, including annual civil rights training.

- The two servers employed by Gourmet Gorilla are considered full-time nutrition staff because they each work more than 20 hours per week in the school nutrition programs. The servers are thus required to complete six annual training hours are required, including annual civil rights training.

Annual Training Requirements for All Staff by Position

- 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.

New Food Service Director Hiring Requirements

- 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](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) 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>).
- The newly designated food service director meets the minimum requirements because they have earned a Master of Business Administration, which is an acceptable educational background without prior experience in school nutrition.

Findings and Corrective Action Needed: Professional Standards

- Finding I:** The new food service director has not completed the required food safety training within 30 days of hire and has not completed any food safety training within the last 5 years.

Corrective Action Required for Finding I: Complete the required food safety training by the negotiated corrective action deadline, and submit documentation of training completion to consultant.

- Finding J:** The new food service director is not designated as such on the online contract.

Corrective Action Required for Finding J: Update the contract to reflect the contact information and title for the new food service director. Notify the consultant when the contract has been updated.

Food Safety

Commendations:

- The meal servers were clearly knowledgeable about food safety and took precautions to prevent cross-contamination during cleaning practices and when using gloves.

Technical Assistance:

Employee Health Reporting Agreements

- The two food service staff members employed by the meal vendor completed the employee health reporting agreement as part of their orientation with the company. These employees report illnesses and work absences to the appropriate supervisors at the meal vendor company, and these

signed forms are retained by the vendor. These practices are acceptable considering the chain of command for the food service employees, SFA, and vendor.

Findings and Corrective Action Needed: Food Safety

- ✓ **Finding K:** The most recent food safety inspection report was posted only in the kitchen and not in a publicly visible area.

Corrective Action Needed for Finding K: The food service director relocated the inspection report to a publicly visible wall in the cafeteria. Corrected on-site; no further action required.

On-site Monitoring

Technical Assistance:

- The SFA completed on-site monitoring although it is not required because the school is a single site. Technical assistance was provided to inform the SFA that on-site monitoring is not required for single site SFAs because daily, direct oversight of the programs is assumed.
-

Buy American

Technical Assistance:

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
 - Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
 - Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not

pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.

- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
 - The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
 - There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
 - More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).
-

Reporting and Recordkeeping

Technical Assistance:

- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain. Any other documents/records pertaining to the child nutrition program, including claiming information, must be retained for a minimum of three years plus the current school year, as described.
-

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

Technical Assistance:

Summer Meals

- Even though a summer feeding program is not operated at the Nativity Jesuit Academy site, 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](#) 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](#) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

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

Findings and Corrective Action Needed: SFSP and SBP Outreach

❑ **Finding L:** Summer food service outreach has not been completed. The school provides summer food service information to families of 6-8th graders that attend the mandatory five week summer camp at a different site in the state at which summer meals are provided. Families of the students that do not attend the summer camp must also be notified of where their children can receive summer meals.

Corrective Action Needed for Finding L: Submit a plan with a timeline outlining how summer food service outreach will be implemented for the upcoming summer.

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!