

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

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**School Food Authority: St. Vincent Pallotti School**

**Agency Code: 40-7370**

**School(s) Reviewed: St. Vincent Pallotti School**

**Review Date(s): 1/24-1/25/2019**

**Date of Exit Conference: 2/11/2019**

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

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

**General Program Reminders/Updates:**

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

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Vincent Pallotti School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet school nutrition program regulations. **During our visit we were impressed with the meal service (food service staff knew each child's name and used it), the appearance of the food and the menu selection. Food service are concerned for each child's nutritional wellbeing.**

The DPI review team is confident that St. Vincent Pallotti will continue to improve their knowledge and operation of child nutrition programs.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

#### Comments/Technical Assistance (TA)/Compliance Reminders

One hundred sixteen (116) eligibility determinations were reviewed, zero (0) errors were identified. Nice job.

#### 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.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
  - When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that 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>).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

#### Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that

are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

#### Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically. If done through software, please check that the income levels are updated each year after July 1 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>).

#### Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

#### Incomplete Applications

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

#### Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

#### 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.

### 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.

### Limited English Proficiency (LEP)

- **Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.**
- **SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.**
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](#) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- **The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.**

### Direct Certification

- Direct Certification electronically matches your student file to a state database of students in families enrolled in FoodShare, W-2 Cash Benefits, FDPIR, Medicaid or Foster Care.
- **A child or other household member's receipt of benefits from an Assistance Program automatically extends eligibility for free benefits to all children who are members of the household. [7 CFR 245.6(b)(7)] Foster child benefits do not extend to other students in a household.**
- SFAs and schools operating a Special Provision must conduct a data match between State records and student enrollment records at least once annually [7 CFR 245.6(b)(1)(v)].
- **As a reminder, you are required to complete a full enrollment direct certification run 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.**
- **Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.**

### Transferring Students

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

### Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year.
- St. Vincent Pallotti School had a 0% certification error rate. More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA.

### Disclosure

- 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>).

### Verification

#### **Comments/Technical Assistance (TA)/Compliance Reminders**

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- **When a benefit eligibility status increases, the change is effective immediately and must be implemented no later than 3 operating days from the date verification was completed. Households**

should be promptly notified through the method the LEA uses to notify the household of approval for benefits.

- When a benefit eligibility decreases, households must be given 10 calendar days' written notice of the change prior to the date the change will go into effect [7 CFR 245.6a(j)]. The first day of the advance notice period is the day the notice is sent. The notice of adverse action may be sent via mail or to the e-mail address of the parent or guardian. The SFA cannot notify the household of adverse action by phone only.
- The SFA must complete the verification activities specified in this section no later than November 15 of each school year [7 CFR 245.6a(b)(1)].
- The Verification Collection Report must be completed annually to indicate the results of the verification process. It is completed online and is due by February 1<sup>st</sup>.

### **Meal Counting and Claiming**

#### **Comments/Technical Assistance (TA)/Compliance Reminders**

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- The counting and claiming system(s) in use for the SBP and NSLP must provide accurate counts of reimbursable meals, by category. Reimbursable meals must be correctly counted, consolidated, and recorded at each school and at the SFA.
- Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record and claim the number of meals actually served to students by category.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- The meal counting and claim for the Review Month was conducted accurately.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations**

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

### **Comments/Technical Assistance/Compliance Reminders**

### Training Opportunities

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

Regular trainings are also offered on the School Nutrition Team (SNT) webpage on the DPI website as [Webcasts](#), webinars, and on-site trainings (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>)

### Documentation

The USDA requires crediting documentation to be obtained by schools and retained on site for as long as the food item is offered to students. Documentation must be updated, as products are changed by manufacturers, so having a procedure in place to review documents bi-annually is recommended.

Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting.

SFAs are required to document how foods offered credit towards weekly meal pattern requirements. This includes:

- Labels off of products purchased and served are required
- Child Nutrition (CN) label. A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that include these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.
- A product formulation statement (PFS). Required for any combination food, meat/meat alternate, or other processed food not found in the USDA *Food Buying Guide* for School Meal Programs. When a CN label is not available for a processed product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs.

Product formulations change frequently, therefore it is important that nutrition facts labels, Child Nutrition (CN) labels, USDA Foods Product Information Sheets (USDA Fact Sheets), and Product Formulation Statements (PFS) on file are kept up-to-date. State-Processed Product Information is updated annually and can be found:



[SY 2018-2019 State Processed Product Nutrition Information](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf) can be found here (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf). Each school year these items must be checked and updated as necessary

[USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) are organized by component and the USDA updates as needed (https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets).

CN labels can be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed. Printing CN labels off of manufacturer's website is not adequate documentation for your program, CN labels must be captured from actual products purchased.

More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).  
Missing documentation.

### OVS

Offer versus Serve (OVS) is not required for grade K-8 students, although it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, grade K-8 students must be served  $\frac{3}{4}$  cup vegetable and  $\frac{1}{2}$  cup fruit to create a reimbursable meal. If OVS is implemented, then students can choose three of the five components offered, including  $\frac{1}{2}$  cup fruit, vegetable, or combination to create a reimbursable meal.

Offer Versus Serve (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. For more information please visit 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 Food Professionals at St. Vincent Pallotti's are serving the 4k students the appropriate sized components, great job!

### Child and Adult Care Food Program (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 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>).

The CACFP allows only unflavored milk under the updated meal pattern. Flavored milk may not be served to pre-kindergarteners (4K). 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>).

### Whole Grain-Rich vs. Enriched Grains

Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning 50% or more of the product needs to be whole grain. When determining if an item is whole grain-rich, the first word in the ingredient list needs to say *whole* or have a whole grain listed first. The bread used for toast at breakfast (12.11.18), is *enriched*, but not whole grain-rich. Please note that if serving these ingredients alone, they will not meet the whole grain-rich requirement of 50% or more of the product needing to be whole grain

### **Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality**

#### Crediting Documentation

**❑ Finding:** Crediting documentation is missing from the following items. Please provide this information by securing a PFS or a CN label directly from the manufacturer. If proper documentation cannot be obtained, you should discontinue using for school meals

Documentation was missing for the following:

- Product label of Sweet Potato fries offered on 12. 10.18
- Tyson chicken patty - a picture of the actual CN label from the box offered on 12.12.2018
- PFS for Alpha Baking Co. 3.5" wheat buns #51480
- PFS for Pepperidge Farm Giant Cinnamon Goldfish offered on 12.13.18
- Max pizza dippers - a picture of the actual CN label from the box offered on 12.14.18
- PFS - Kellogg's Smart Start Original Antioxidants offered at brkft on Dec.10, 12 - 14, 2018
- PFS - Kellogg's Special K with Red Berries offered at breakfast on Dec. 10, 12,13,14, 2018
- PFS - Kellogg's Kashi Go Lean Crunch offered at breakfast on Dec. 10,12,13,14, 2018
- Updated CN label or PFS for the Breakfast Pizza offered on 12.13.18
- Pancakes offered on 12.14. 2018

**Corrective Action Needed:** Provide PHN with all missing documentation from the above list. Once the Public Health Nutritionist has all crediting documentation for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

### Child and Adult Care Food Program

❑ **Finding:** Students not yet in five year old kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. Discontinue serving unallowable milk type.

**Corrective Action Needed:** Submit a statement explaining your understanding of the allowable milk types under CACFP for the 4k students and how you plan to ensure that only white milk, skim or 1% is served to 4k students.

#### Whole-grain rich

❑ **Finding:** Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning 50% or more of the product needs to be whole grain. The sliced Alpha Bread #12654, offered during the week of review is not whole grain-rich.

**Corrective Action Needed:** Find a new whole grain-rich version of the sliced bread and submit nutrition facts label, ingredient list, and the product formulation statement.

### **SMART SNACKS**

#### Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at St. Vincent Pallotti Catholic Grade School. 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

### **BUY AMERICAN**

#### Comments/Technical Assistance/Compliance Reminders

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

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

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

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

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

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

**Finding:** Currently St. Vincent Pallotti has a binder with all the information pertaining to the Buy American provision, however the noncompliance tracking form is missing.

**Corrective Action Needed:** Submit to the PHN a detailed statement describing you method for checking, tracking and ensuring to the best of your ability, products purchased for and offered to students at St. Vincent Pallotti will comply with the Buy American provision.

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### Comments/Technical Assistance (TA)/Compliance Reminders

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

#### Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
  - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
  - Under "Purchases Services" report any time you pay someone for services provides such as equipment repair and health inspections.
  - Under "nonprogram foods", report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.

- When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

#### Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

#### 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>).

#### Findings and Corrective Action Needed: Nonprofit School Food Service Account

- **Finding #1:** On the Annual Financial Report, the revenues were recorded as transfers and the transfers as revenues.  
**Corrective Action Needed:** Please resubmit your 16-17 Annual Financial Report with revenues and expenses broken out by program and category. To do this, please make the corrections directly on the ‘17-‘18 report and email corrected report back to reviewer. Reviewer will then contact Jacque Jordee at [Jacqueline.jordee@dpi.wi.gov](mailto:Jacqueline.jordee@dpi.wi.gov) or 608-267-9134 and fax or email her an updated report to complete a manual update.

## Paid Lunch Equity (PLE)

### Comments/Technical Assistance (TA)/Compliance Reminders

- The **PLE survey** (for 2018-2019 only) was completed as required.
- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the [PLE 'In a Nutshell'](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf) for more information on the PLE tool (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf).
- Refer to the most recent [memo](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf) from DPI (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf).
- Refer to the most recent [guidance memo](https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf) from USDA (https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf).
- Step by step instructions to completing the PLE tool can be found on our [financial website](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) under Paid Lunch Equity (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

## Revenue from Nonprogram Foods

### Comments/Technical Assistance (TA)/Compliance Reminders

- **Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.**
- **All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.**
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx).

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

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

## Adult Meals

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

guide.doc).

- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

#### Resources

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

#### **Findings and Corrective Action Needed: Revenue from Nonprogram Foods**

- ❑ **Finding #1:** The unpaid meal charge policy indicates that alternate, nonreimbursable meals (cheese sandwich and milk) are offered and charged to students at rates below cost: \$.20 and \$.40. These are nonprogram foods and must have all costs associated with them covered through nonfederal funds means.

**Corrective Action Needed:** Please provide a statement indicating how the school will track and cover these costs going forward.

#### **Indirect Costs**

##### **Comments/Technical Assistance (TA)/Compliance Reminders**

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

#### **4. GENERAL PROGRAM COMPLIANCE**

##### **Civil Rights**

##### **Comments/Technical Assistance (TA)/Compliance Reminders**



### Nondiscrimination Statement

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

### And Justice for All Poster

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

### Civil Rights Training

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

### Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

### 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.

#### Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits.

#### 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 five days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\_combined\_6\_8\_12.pdf).

#### **Findings and Corrective Action Needed: Civil Rights**

- ❑ **Finding #1:** Civil rights complaint policy needs to add language regarding forwarding the complaint to the state agency (DPI) within 5 days.

**Corrective Action Needed:** Submit updated policy as corrective action.

#### **Local Wellness Policy**

##### **Comments/Technical Assistance (TA)/Compliance Reminders**

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

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

#### **Content of the Wellness Policy**

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice -](#)

[School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies ([http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

### **Findings and Corrective Action Needed: Local Wellness Policy**

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

### **Professional Standards**

#### **Comments/Technical Assistance (TA)/Compliance Reminders**

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

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

[Professional Standards: New Food Service Director Hiring Requirements](https://dpi.wi.gov/school-nutrition/professional-standards) (<https://dpi.wi.gov/school-nutrition/professional-standards>). Please see the DPI Professional Standards webpage for more information.

**New Food Service Director Minimum Hiring Standards:**

SFA Enrollment under 500: High school diploma (or GED) AND at least 1 year relevant experience in school nutrition.

SFA Enrollment under 2,499: High school diploma (or GED) AND at least 3 years relevant experience in school nutrition.

SFA Enrollment 2,500-9,999: Associate degree (or equivalent) with a related academic major AND at least 2 years relevant experience in school nutrition.

SFA Enrollment > 10,000: Bachelor’s degree (or equivalent) in any academic major AND at least 5 years relevant experience in school nutrition.

**Professional Standards: Training Requirements**

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

**Annual Training Requirements for All Staff**

- Directors: 12 hours
- Managers: 10 hours

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

### **Findings and Corrective Action: Professional Standards**

- ❑ **Finding:** Training is not being monitored on a tracking tool.  
**Corrective Action Needed:** Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

### **Water**

#### **Comments/Technical Assistance (TA)/Compliance Reminders**

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

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

### **Food Safety and Storage**

#### **Comments/Technical Assistance (TA)/Compliance Reminders**

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

#### **Food Safety Inspections**

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

#### **Temperatures**

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

#### **Food Safety Plans**

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)

- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- **The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.**
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

#### Food Employee Reporting Agreements

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

#### Storage

- **SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).**
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.

#### Time/Temperature Control for Safety (TCS) Food

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

#### Time as Public Health Control

- When using “Time as a Public Health Control”:
  - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
  - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.

- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

### **Findings and Corrective Action: Food Safety**

- ❑ **Finding #1:** Not following Food Safety Plan SOPs for glove use and date marking.  
**Corrective Action Needed:** Review both of the above SOPs, date and initial and send copy of the dated/initialed SOP to reviewer as corrective action.
- ❑ **Finding #2:** Program cooler inventory not segregated and secured from parish inventory.  
**Corrective Action Needed:** Please provide a statement indicating how program will be separated and secured from parish/nonprogram inventory.

### **Reporting and Recordkeeping**

#### **Comments/Technical Assistance (TA)/Compliance Reminders**

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

### **Findings and Corrective Action: Reporting and Recordkeeping**

- ❑ **Finding:** Breakfast count sheets are not kept on file for the minimum required timeframe.  
**Corrective Action Required:** Provide a Statement of how records will be maintained as required.

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

#### **Comments/Technical Assistance (TA)/Compliance Reminders**

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

### **Breakfast Promotion**

The breakfast participation at St. Vincent Pallotti is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be



found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

### Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at St. Vincent Pallotti School, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. St. Vincent Pallotti does announce the availability of summer meals. It is suggested that more detail defining the SFSP be included in the flyers that go to families. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

### Resources:

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

## 5. OTHER FEDERAL PROGRAMS REVIEWS

### Afterschool Snacks

#### Comments/Technical Assistance/Compliance Reminders

- Each site participating in the Afterschool Snack Program needs to have an onsite monitoring review completed within the first four weeks of operation, and a second review within the school year. The review form to complete may be found on our [Afterschool Snack Program](http://dpi.wi.gov/school-nutrition/after-school) webpage (<http://dpi.wi.gov/school-nutrition/after-school>).
- Area Eligible Afterschool Snacks are all claimed at the free rate.
- **Each afterschool snack location is required to maintain documentation supporting that reimbursable meals were provided to students, including production records with snack items and serving size. Menus are not required, but encouraged. Production record examples are found on the afterschool snack program webpage linked above.**
- **Participating students are claimed by eligibility category (free, reduced, or paid) when a reimbursable snack is selected.**
- Afterschool sites must provide educational or enrichment activities in an organized, structured, and supervised environment.
- [Snack Count Sheets](#) and [production record templates](#) are located on the Afterschool Snack webpage (<http://dpi.wi.gov/school-nutrition/after-school>).

“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>).”



*With School Nutrition Programs!*