

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. Marcus Lutheran School **Agency Code:** 407646

School(s) Reviewed: St. Marcus Lutheran School Main Campus

Review Date(s): 1/23-25/17

Date of Exit Conference: 1/25/17

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the [DPI SNT webpage](#).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the [DPI SNT GOALS webpage](#).
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the [DPI SNT Financial Management webpage](#) under *Unpaid Meal Charges* section.

Appreciation:

Thank you to the staff at St. Marcus Lutheran School for the courtesies extended during the on-site review. Thank you for taking the time to respond to the off-site questions as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Community Eligibility Provision - Certification and Benefit Issuance

As a reminder, SFAs participating in CEP **must** maintain all certification documents supporting participation in CEP. St. Marcus Lutheran School participates in CEP SFA-wide, with 100% Free Claiming/0% Paid Claiming percentages. Participating CEP schools **must** inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).

Visiting Students

The [CEP Visiting Students Flow Chart](#) has been created to assist SFAs in understanding how to claim visiting students to their school and when their own students visit another SFA.

Verification

The SFA participates in CEP SFA-wide with 100% Free Claiming/0% Paid Claiming percentages. Verification activities are not required of the SFA. However, submission of the Verification Collection Report (VCR) is required. Assistance was provided on submitting the VCR during the on-site.

Meal Counting and Claiming

Breakfast was observed on Tuesday, January 24, 2017. The SFA utilizes the following counting methods for breakfast:

Grades K4-4 – Breakfast in the Classroom. Popsicle sticks are used to count students as they select a reimbursable meal. Total breakfast meal counts are then recorded on a classroom slips that are submitted for inclusion in the claim for reimbursement.

Grades 5-8 – A cell phone tally app is used. Student select a reimbursable meal and then tap the screen to record their meal. Counts are recorded and submitted for inclusion in the claim for reimbursement.

Reimbursable breakfast meals were correctly identified and claimed. No meal counting errors were observed.

Lunch was observed on Tuesday, January 24, 2017.

Grades K4-K5 – Students pick up lunch from a central location but return to their classrooms to eat. Popsicle sticks are used to count students as they select a reimbursable meal. Counts are recorded and submitted for inclusion in the claim for reimbursement.

Grades 1-4 - Student pick up and eat lunch in the cafeteria. Popsicle sticks are used to count students as they select a reimbursable meal. Counts are recorded and submitted for inclusion in the claim for reimbursement.

Grades 5-8 – A cell phone tally app is used. Student select a reimbursable meal and then tap the screen to record their meal. Counts are recorded and submitted for inclusion in the claim for reimbursement.

Reimbursable lunch meals were correctly identified and claimed. No meal counting errors were observed

****Note, the Afterschool Snack Program is included at the end of this report.****

The December 2016 claim for reimbursement for breakfast and lunch was reviewed. St. Marcus Lutheran School consolidates the claim from its two sites.

Review of the breakfast claim indicated order counts rather than actual meal counts are being claimed for one site while transposition errors and failure to ensure all Breakfast in the Classroom slips were received and counted were noted at the other site. These issues have resulted in a fiscal recalculation of breakfast meal count figures.

Review of the lunch claim revealed meal count documentation does not support claim figures on 10 (ten) days from the review period at one site while transposition errors from meal count slips were noted at the other site. These issues have resulted in a fiscal recalculation of lunch count figures.

Furthermore, no monthly [CEP Meal Count Edit Check Form](#) was being kept to review claim figures. Please see the *Findings* and *Corrective Actions* below that address these issues.

Additionally, as bag lunch/field trip meals were recorded during the month of December 2016, if the SFA is providing reimbursable meals for field trips, accurate Point of Service (POS) counts **must** be used in the claim for reimbursement. Rosters should be sent with teachers and students should be marked when they receive a meal. The DPI SNT has field trip resources on the [DPI SNT Menu Planning webpage](#), including:

- [Field Trip Meals Overview](#)
- [Templates](#) (Bag Meal Order Request Form, Bag Meal Packing Slip, List of Students Receiving Reimbursable Meals, SOPs)

Finally, as a reminder, only actual student meal counts can be used in the claim for reimbursement. Forecasted meal counts and tray counts are *not* correct means to obtaining meal counts and while helpful for forecasting production and reviewing meals served for the day, these count cannot be used in the claim for reimbursement.

Findings and Corrective Action Needed

Finding #1: Documentation and consolidation procedures did not support the December 2016 breakfast and lunch claims for reimbursement. A fiscal recalculation must be completed.

Corrective Action Required: Please provide a summary of the training provided to all individuals responsible for submitting and consolidating meal count figures. Following correction with all involved, please obtain 30-consecutive days of clean claiming data by site for breakfast and lunch. Submit this data to DPI for completion of the fiscal recalculation.

Additionally, as described in the *Finding* below, please submit completed CEP edit checks for the month of February 2017. Please take note of the differing time periods, in that one is the month of February 2017 while the other is for 30-consecutive days, which will span longer than a month.

Finding #2: No [CEP Meal Count Edit Check Form](#) was being kept to review breakfast or lunch claim figures.

Corrective Action Required: Submit completed CEP Meal Count Edit Checks for breakfast and lunch for the month of February 2017.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the menu planner at MCFI for sending thorough, organized meal pattern documentation and answering many questions prior to the on-site review. Thank you to the staff at St. Marcus for serving healthy meals to students every day. The review week from December 2016 had no meal pattern errors, which is fantastic!

Vegetable Crediting

Remember that leafy green vegetables credit as half the volume served. For example, ½ cup of Romaine lettuce credits as ¼ cup dark green vegetable. On one day during the review week, the crediting of the leafy green vegetable was written incorrectly on the production record. This did not lead to a daily vegetable shortage since other vegetable was offered, but it could cause meal pattern problems in the future. Technical assistance was given prior to the on-site review and the production records were updated to reflect accurate crediting. We also discussed that if a student takes ½ cup of leafy green vegetable, they still need to take another ¼ cup fruit or vegetable to have a reimbursable meal under Offer versus Serve. The menu planner stated that she would have a meeting with staff to discuss this.

Offer versus Serve (OVS)

As note in *Meal Counting and Claiming*, no non-reimbursable breakfast or lunch meals were observed in any of the meal service areas. For younger students, meals are partially pre-plated, allowing students the opportunity to select the milk type of their choosing. Older students have greater opportunity to select or decline components as long as the minimum required quantities for reimbursement are present. OVS is optional for students in grades K-8 (the population of students the SFA serves). The SFA is encouraged to continually look for options to fully implement OVS, as both a means for students to learn to self-select foods as well as a food waste reduction mechanism.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Access to the SFA's Child Nutrition Report, which provides a compilation of meals claimed, reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, is described in the document [Viewing the Child Nutrition Report](#). The DPI Aids Register is also available to track all program deposits made to the SFA's account as well as the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. The Aids Register is available on the DPI SNT [Financial Management webpage](#). Both resources are also accessible from the [Online Services webpage](#).

Annual Financial Report

In SY 16-17, all revenues including reimbursements and student payments and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. Please note there are additional categories than in previous years:

- **NSL** - schools participating in the National School Lunch Program.
- **SB, SBSEVERE** - both regular School Breakfast and Severe Need Breakfast.
- **SK-NSL, SK-NSLAE** - both After School Snacks and Area Eligible Afterschool Snacks.
- **SMP** - Special Milk Program.
- **Grants** - all grant awards and expenditures.
- **WSDMP** - Wisconsin School Day Milk Program.
- **EN** - Elderly Nutrition.
- **Nonprogram Foods** - all Nonprogram Foods (including: a la carte items, adult meals, milk only, extra entrees, vended meals sold under a joint agreement, catered meals, vending machines, etc.)
- **CACFP** - daycare and supper meals claimed under Child and Adult Care Food Program.
- **SFSP** - meals claimed in Summer Food Service Program.

The [new SY 16-17 Annual Financial Report instructions](#) are located on [DPI SNT Financial Management webpage](#).

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](#). For a more comprehensive overview, see [SP 58-2016: Unpaid Meal Charges Guidance](#). In addition, 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, as noted in [SP57-2016 Unpaid Meal Charges Guidance](#).

Revenue from Nonprogram Foods

All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals nor be absorbed by the food service account. Nonprogram food costs and revenues must be separated from program food costs and revenues.

SFAs that sell **only nonprogram milk** and **adult meals** as nonprogram foods are exempt from completing the USDA Nonprogram Food Revenue tool. However, these SFAs are still required to separate out their nonprogram milk and adult meal costs from program costs and nonprogram milk and adult meal revenues from program revenues.

Nonprogram Milk

Compliance is determined by recovering more than the per-serving cost. For example, if the per serving raw food cost of a carton of milk is \$0.21, a minimum charge of \$0.25 would be allowable as it would cover the food cost and add a small amount to cover other costs.

- Food cost expenditure for nonprogram food milk may be pulled out of total food cost expenditure by taking the average net dairy cost (e.g. \$0.21) X number of nonprogram milks sold. Any paper cost like straws or napkins should also be included.
- Revenue from nonprogram food milk may be pulled out of total revenue by taking the actual per carton selling price (e.g. \$0.25) X number of nonprogram milks sold.

Adult Meal

Compliance is determined if adult meals are priced using the adult meal minimum price calculation, which for non-pricing schools is the free federal reimbursement rate plus the state reimbursement plus the USDA foods value.

Indirect Costs

DPI has a long-standing policy that does not allow schools (public or private) to charge indirect costs to the School Food Service Fund (Fund 50). Indirect costs occur when a district/school charges a percentage of general costs that have been incurred for common or joint purposes (and can't be readily identified as a direct cost) to a specific program. In Wisconsin, in order to charge an amount for services to food service, the methodologies for determining indirect costs must be specified and the amount to be charged supported through documentation. The key to determining whether a chosen methodology is appropriate and acceptable is to make certain that, if audited, the process/documentation used to assess and verify costs charged to school food service would be considered reasonable/defensible.

Within the WUFAR system, expenditures for gas, electricity, vehicle, fuel, water, etc., all have specific function and object numbers under Fund 50 expenditures. For both public and private school, examples of supporting documentation for costs assessed to Fund 50 (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.
- **Extermination services and laundry services** - documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Nondiscrimination Statement

The SFA uses template letters from the DPI SNT for communications with households regarding participation in CEP. As a reminder, if the SFA develops its own communications, the documents should contain the full USDA Non-discrimination statement, which is available on the DPI SNT [Civil Rights webpage](#). When space is limited, such as on printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

And Justice for All Poster

An “And Justice for All” poster was available and readable in the cafeteria.

Public Release

As a reminder, the SFA should send the public release to media *and grassroots organizations* and, as applicable, local unemployment offices and major employers contemplating or experiencing large layoffs.

Limited English Proficiency (LEP)

CEP materials and other communications with households 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.

To assist SFAs in reaching households with limited English proficiency, the DPI SNT provides CEP materials in English, Spanish, and Hmong on the [DPI SNT CEP webpage](#).

Civil Rights Training

Civil rights training had been completed and documentation was available for review.

Civil Rights Self-Compliance Form

Aside from question 10a, the [Civil Rights Self-Evaluation Compliance form \(PI-1441\)](#) was completed by the SFA. Further discussion with the DPI SNT indicated an individual *must* be identified by the SFA for question 10a. Please see the *Finding* and *Corrective Action* below requesting identification of an answer and individual for question 10a.

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 practitioner. SFAs may use the [template Dietary Request Form](#) posted on the [DPI SNT Special Dietary Needs webpage](#). This template is also available in Spanish and Hmong. SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner.

School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA still have a completed Dietary Request Form on file from a medical authority, such as a school nurse, to support the request. These types of accommodations must be made according to the USDA's meal pattern requirements in order for the meals to be claimed for reimbursement. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are being handled equitably.

Additionally, technical assistance was provided on-site encouraging the SFA to communicate to households they are 'peanut aware' rather than 'peanut-free' as the SFA can request but is unable to regulate what products students bring from home.

Processes for complaints

Schools must have a process for receiving and processing complaints alleging discrimination within USDA Child Nutrition Programs. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the SFA must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. 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. The [USDA Program Discrimination Complaint Form](#) is available to assist in filing these complaints and can be found on the [DPI SNT Civil Rights webpage](#).

On-site Monitoring

Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1. For more information see USDA memo SP 56-2016 <http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.

At the time of the on-site, while before February 1, no on-site monitoring of lunch or breakfast has been completed, nor had lunch monitoring been completed in SY 15-16. Completion of the on-site monitoring reviews would have revealed the inappropriate claiming methods that have required fiscal recalculation. Please see the *Finding* and *Corrective Action* below that addresses the lack of on-site monitoring. Note, as the SFA participates in CEP SFA-wide with 100% Free/0% Paid claiming percentages, the SFA should utilize the CEP-specific on-site monitoring forms below:

- [CEP National School Lunch On-site Monitoring Form](#)
- [CEP School Breakfast Program On-site Monitoring Form](#)

Finding #3: Question 10a from the [Civil Rights Self-Evaluation Compliance form \(PI-1441\)](#) was not completed by the SFA.

Corrective Action Required: Please review and complete question 10a. Please submit a copy to DPI along with the name of the individual selected to carry out this role.

Finding #4: While the on-site review took place prior to February 1 (the due date for on-site monitoring) the SFA did not complete lunch on-site monitoring in SY 15-16.

Corrective Action Required: Complete the [CEP National School Lunch On-site Monitoring Form](#) and [CEP School Breakfast Program On-site Monitoring Form](#). Submit completed forms to DPI.

Local Wellness Policy Summary for Administrative Review

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

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

At a minimum the wellness policy must include:

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

SFAs must complete an assessment of the policy every three years (Triennial Assessment) to determine compliance with the policy, how the policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment, as well as the wellness policy and any updates to the policy, available to the public.

A summary of the requirements can be found at:

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 process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

St. Marcus Lutheran School's Local Wellness Policy (LWP) was reviewed and the SFA is reminded of the following:

- SFAs are required to identify the official responsible for oversight of the LWP. SFAs may elect to include the position/title of the individual instead of a specific name.
- SFAs are required to permit certain groups to participate in the LWP development, implementation, review, and updates. St. Marcus is encouraged to outline these groups in the LWP.
- SFAs must include, at a minimum, one goal for Other School-Based Strategies for Wellness in the LWP. SFAs must explore the use of evidenced based strategies when identifying goals.
- Language should be included regarding the assessment to be completed every 3 years (triennial assessment) along with information on the contents of the LWP, implementation of the LWP and how the results of the assessment will be made available to the public.

Smart Snacks in Schools

There are no competitive foods or beverages that are regularly sold at St. Marcus Lutheran School. If St. Marcus starts selling competitive foods/beverages, or if any food/beverage fundraisers are held on the school campus during the school day, the Smart Snacks rule must be followed. You can find more information on the rule here: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

St. Marcus already has a procedure in place for tracking fundraisers, which is commendable. The only food fundraisers that were held sold foods not intended for consumption during the school day, such as coffee beans and frozen pizzas. Each student organization may hold two exempt fundraisers per school year, with each fundraiser lasting no longer than two consecutive weeks. If any food or beverage fundraisers occur in the future that fall under the Smart Snacks rule, make sure to keep track of what was sold, who sold it, and for how long the fundraiser lasted. There are template tracking tools you may use if you wish, which are found at the Smart Snacks webpage that is linked above.

Professional Standards

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

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

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.

Technical assistance was provided to the SFA that all involved in the operation of the school nutrition program, including both SFA and vendor employees, should be obtaining and documenting continuing education. Continuing education logs should include the name of the staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Continuing education can be tracked minute-for-minute and be obtained in a variety of formats (online, in person, webinars) from various providers (DPI, USDA, in-house, etc.). Learning codes are not required, but encouraged. A [DPI developed Microsoft Excel based tracker](#) is posted to the [DPI SNT Professional Standards webpage](#).

Annual Training Requirements for All Staff - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

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

Water

Water is required to be available at no charge to students during the lunch and breakfast meal services. At the primary campus, lunch and breakfast is served at various locations within the building. While the regulation has been met in the various serving locations, the SFA is encouraged to consider offering a designated lunch and breakfast water pitcher for each classroom that consumes meals in the room. Additionally, the SFA is encouraged to consider water glasses for students to use at the drinking fountain during meal service.

Food Safety and Storage

Food Safety Inspections

The most recent food safety inspection was posted and available for review in the cafeteria. Thank you for moving the inspection to public view.

However, documentation of two separate food safety inspections in SY 15-16 was not available on-site. Please contact your local authority responsible for completing food safety inspections and request copies of all inspections from SY 15-16. Please see the *Finding* and *Corrective Action* that addresses this issue.

Food Safety Plan

The food safety plan was available for review.

Temperatures

Temperature logs were being maintained for freezers and refrigerators.

However, unused milk from Breakfast in the Classroom was observed being returned to the milk cooler. Discussion with the food service employee indicated temperatures were being taken to ensure the milk was below 41 °F but no documentation was being maintained. Additionally, the milk did not appear to have any means to keep the temperature below 41 °F, such as an insulated cooler and/or barrel, which are required in order to re-serve the milk.

St. Marcus should work with their local sanitarian to develop a Standard Operating Procedure (SOP) and temperature log to ensure the safety and quality of the milk. Resources that may be of value to St. Marcus, that are found on the [DPI SNT Food Safety webpage](#), include:

- [Use of Insulated Milk Barrels](#): Time as a Public Health Control Option
- [Use of Milk Barrels: Monitoring of Temperature Option](#) - Schools selecting this option may reuse milk if the temperature log shows that milk has been maintained at 41 degrees F. or below when temperature of the barrel is monitored.
- [Use of Milk Bags: Monitoring of Temperature Option](#) - Schools selecting this option may reuse milk if the temperature log shows that milk has been maintained at 41 degrees F. or below when temperature of the bag is monitored. Frozen inserts must be used with milk bags.

Storage

The on-site storage areas were reviewed and appeared orderly. Areas reviewed included freezers, refrigerators, and the dry good storage room.

Buy American

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in school meal programs as well as supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf. The Buy American provision should be included in solicitations, contracts, and product specifications.

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.

SFAs must monitor contractor performance to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. This is accomplished by ensuring the product label designates the United States, or its territories, as the country of origin. Therefore, SFAs must ensure that products delivered comply with any Buy American contract provisions by reviewing products and/or delivery invoices/receipts to identify the country of origin is the United States or its territories. SFAs also need to conduct a periodic review of storage facilities, freezers, refrigerators, dry storage, and warehouses to ensure products comply with the Buy American provision, unless a limited exception has been approved.

No non-compliant products were noted during the on-site review at St. Marcus

If non-compliant products are observed in the future, both the SFA and vendor should work together with distributors to see if these products are available domestically. If they are not, documentation requested in the [Non-compliant Product List](#) should be obtained. Please note, the use of this form is the exception, not the rule.

More information on this new requirement can be found on the [DPI SNT Procurement webpage](#). The SFA is encouraged to ask questions on this regulation during their Procurement Review.

Reporting and Recordkeeping

As a reminder, there are additional record retention rules for CEP. LEAs/schools **must** retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP. Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

School Breakfast Program (SBP) Outreach

The SFA participates and meets promotion requirements for the School Breakfast Program (SBP). Parents play an important role in School Breakfast Program participation. A [video](#) was developed to show parents the benefits that the School Breakfast Program provides for them and their children. 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.

Summer Food Service Program (SFSP) Outreach

As part of the National School Lunch Program (NSLP), it is requirement to complete SFSP outreach. The purpose is to inform students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Options for outreach include informing families via email and/or newsletter about the availability of free summer meals via the [Summer Meals Map](#), the option to call 2-1-1 to connect with local health and humans services, the option to text ‘food’ to 877-877, and/or [posting free SFSP posters](#) in the SFA. For more information on Summer Food Service Program, please contact:

Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
Phone: 608.266.7124
E-mail: amy.kolano@dpi.wi.gov

Finding #5: Documentation of two separate food safety inspections in SY 15-16 was not available on-site.

Corrective Action Required: Contact your local authority responsible for completing food safety inspections and request copies of all inspections from SY 15-16. Submit copies to DPI.

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snack Program (ASP)

The ASP was observed on Monday, January 23, 2017 at the primary campus, the school of focus for the Administrative Review. No non-reimbursable snacks were observed. The December 2016 ASP claim was reviewed. Review of the ASP claim indicated order counts rather than actual snack counts were being used at one site while transposition errors from POS count sheets to a claim consolidation form was noted at the other. These issues have resulted in a fiscal recalculation of ASP count figures. Please see the *Finding* and *Corrective Action* below that addresses this issue.

Fresh Fruit and Vegetable Program

As part of the AR, St. Marcus’ September 2016 FFVP claim was validated. There were no problems found when comparing the claim to the invoices. Nice work! Thank you for all you do to offer FFVP to your students.

Prior to the on-site review, we discussed the requirement to serve FFVP twice per week. This is required even if it means that FFVP funding will run out before the end of the school year. If you have any further questions on this in coming months, please contact a FFVP coordinator.

As a reminder, FFVP cannot be withheld as a form of punishment. Additionally, the SFA is encouraged to continually publicize participation in the FFVP program with students as well as households. The SFA could promote the program on its website, in email communications or newsletters home to households and/or on monthly meal menus.

Finding #6: Documentation and consolidation procedures did not support the December 2016 ASP claim for reimbursement. A fiscal recalculation must be completed.

Corrective Action Required: Please provide a summary of the training provided to all individuals responsible for obtaining and submitting ASP claim figures. Furthermore, please include an explanation of how the SFA will ensure proper consolidation of ASP figures in future claims. Following correction with all involved, please obtain 30-consecutive days of clean claiming data by site for the ASP. Submit this data to DPI for completion of the fiscal recalculation.

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

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

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate webpage](#).

