

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

School Food Authority: St. Matthias School

Agency Code: 40-7735

School(s) Reviewed: St. Matthias School

Review Date(s): November 6-8, 2018

Date of Exit Conference: November 8, 2018

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

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

General Program Reminders/Updates:

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Matthias 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 staff at St. Matthias School for their willingness to make changes to meet school nutrition program regulations and their eagerness to improve processes. The principal, secretary and teaching staff are concerned with serving students through efficient programs. All staff were cordial, friendly and helpful. Thank you to everyone who contributed to this review.

The DPI review team is confident that St. Matthias Schools will continue to improve their knowledge and operation of child nutrition programs. We look forward to conversations in the future as you grow your programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

Seventy-six eligibility determinations were reviewed, with only one error identified.

Free and Reduced Price Meal Applications

- (TA) 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.
- (TA) 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.
- (TA) 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 monthly or annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1819.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-1819.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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1819.pdf) (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-1819.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/free-reduced-app-parent-letter-faq-1819.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-app-parent-letter-faq-1819.docx>).
- (TA) Make annual updates to the Power School software to be sure the IEGs are updated after July 1.

Household Size Box

- (TA) 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

- (TA) 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.

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.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

Public Release

- (TA) All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nsfp-public-release-1819.doc) before the start of the school year (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nsfp-public-release-1819.doc>). 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)

- (TA) 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) (<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

- (TA) As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running the Direct Certification matches in the required timeframes, 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.

- 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.

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 district is not disclosing individual free and reduced meal eligibilities for local initiatives; rather, the household is given the opportunity to self-disclose their eligibility for fee waivers.
- 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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) 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](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Verification

Commendations/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 must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Meal Counting and Claiming

Commendations/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.
- Meals are provided by the vendor MCFI. Meals seem to be acceptable to students. The SFA asked about the possibility of entrée choices and having extra food on hand in case the counts change or

meal trays are dropped. The frozen strawberry and blueberry mixture was fairly frozen and difficult for students to eat on 11-7-18.

- (TA) 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](#) 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 correctly.
- 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.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at St. Matthias School as well as MCFI. Documentation was provided prior to the on-site review in a timely manner. Staff on-site was open to technical assistance, asked good questions and are planning to implement changes during meal service to better serve students. Thank you for all you do for the students at St. Matthias.

Comments/Technical Assistance/Compliance Reminders

Meal Pattern Requirements

It is recommended that small quantities of food be kept on hand at St. Matthias. This will ensure that if there is a shortage of any of the components, an acceptable back-up is available so that all students are provided with a reimbursable meal.

Crediting

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

- The documentation provided for the cornbread was outdated. Updated documentation was shared with MCFI.

- A Child Nutrition Summary was provided for the Tyson Breaded Chicken Drumstick. However, this was not a complete and acceptable PFS. Acceptable documentation was obtained from Tyson and shared with MCFI.

Pre-K Students in the National School Lunch Program

During the week of review (October 15-19, 2018), St. Matthias was following the CACFP meal pattern for 4K students. While production records show that both white and chocolate fat free milk were available, 4K students only had access to the unflavored variety per meal pattern requirements. Both varieties were listed as milk usage was determined at the end of meal service and therefore included all milks selected by 4K and K-8 students.

Based on conversations prior to the on-site review, it was determined that the 4K students were actually comingled as the K-2 students often started coming through the line before the 4K students were finished. St. Matthias implemented the comingling flexibility on 10/29/18 and is now serving all students, 4K-8 the same K-8 meal pattern.

Spanish Resources

There are [webcasts](#) recorded in Spanish for each of the components (La Fruta, El Grano, La Carne, La Leche, La Verdura [<https://dpi.wi.gov/school-nutrition/training/webcasts>]). Additionally, the [Lunch in a Nutshell](#) document has been translated into Spanish (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell-spanish.pdf>)

School Breakfast Program

St. Matthias does not currently participate in the School Breakfast Program. Participation in the program is encouraged, as ensuring students have access to breakfast is beneficial for their health and academic success. Specifically, students who eat breakfast at school, closer to class and test taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. Furthermore, providing students with breakfast in the classroom setting is associated with lower tardy rates and fewer disciplinary referrals.

For the 2019-2020 School Year, St. Matthias would qualify for Severe Need Breakfast, providing additional reimbursement for each breakfast served to children who qualify for free or reduced price meals. The additional reimbursement provided can help in making alternative financial models, such as Elimination of Reduced Price Breakfast or Universal Free Breakfast feasible.

Our [breakfast resources webpage](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>) contains a wealth of information about the different breakfast service and financial models for your reference. If you ever have questions on breakfast models or starting a program, please contact our [School Breakfast Program Specialists](mailto:DPISBP@dpi.wi.gov) (DPISBP@dpi.wi.gov).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

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

- The consultant addressed financial topics including how to locate 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).

Annual Financial Report (AFR)

- (TA) 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. The [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.
- (TA) 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".
- 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". Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
 - "Equipment" should reflect major purchases of equipment.
 - Under "Purchases Services" report any funds you pay someone for services provided, 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, milk 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>).
- (TA) 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

- (TA) 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 snap-shot 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
- St. Matthias School provides written notice to households in the annual family handbook that communication informing a low balance will occur when the meal account balance reaches \$20.00; this is an effort to keep the account positive. The school is interested in students able to receive the meals.
- 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>).

Paid Lunch Equity (PLE)

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

- The Paid Lunch Equity (PLE) tool shows where the school is in relation to the national benchmark of a meal price. The PLE uses October data for paid lunches as entered in the tool.
- The SFA’s current weighted average for 2018-19 SY tool is \$2.92.
- Refer to the [PLE ‘In a Nutshell’](#) for more information on the PLE tool.

Revenue from Nonprogram Foods

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

- (TA) Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, and Extra Milk (for cold lunch or milk break).
- 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>).

- 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.
- 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>).

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

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.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<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>)

Indirect Costs

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

- DPI does not allow the annual assigned indirect cost rate to be applied to the Foodservice fund. 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 reality 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

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

Nondiscrimination Statement

- (TA) When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement (<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. Thank you for having the poster near the serving line in a frame.

Civil Rights Training

- (TA) 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 Self-Compliance Form

- (TA) The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) 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

- (TA) 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf) 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>).

Processes for complaints

- All verbal or written civil rights complaints alleging discrimination within the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or the State Agency (DPI School Nutrition Team) within 5 days, per FNS Instruction 113-1 (Section XVII Section C, paragraph 2). You will want to make sure that this is included in the district procedures to ensure compliance.
- Additionally, per FNS Instruction 113-1, if an individual makes allegations of discrimination *orally* and “is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements” of the allegation for said individual. (Note: The items which should be included in the write up are listed in FNS Instruction 113-1.) Such complaints should then be forwarded to the State or Regional office, as appropriate, within the established timeframes.
- (TA) 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. An 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](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Local Wellness Policy

Commendations/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 be in full compliance of the final rule by June 30, 2017.
- (TA) 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.
- (TA) The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform the public about the content, implementation of, and updates to the LWP annually. This SFA did not notify the public regarding updates to the LWP, although the policy says it will be posted on the website. It was not included in the handbook, either. SFAs may use a variety of methods to notify the public about the LWP and its updates. This may include mailing flyers,

newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification.

Resources:

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

Professional Standards

Commendations/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.

Professional Standards: New Food Service Director Hiring Requirements

- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>). The director meets the hiring standards. Thank you!

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, ICN, in-house, etc.).
- (TA) 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
- 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.

SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption.

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but this may not occur in the meal service area during meal service times.

There is no required template that must be used to track fundraisers or products sold that are subject to Smart Snacks standards. However, tracking tool templates are available on the [Smart Snacks page](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) of our website and may be helpful in tracking this information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). Locations where exempt fundraisers occur, must be documented to ensure compliance with the regulation.

The [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) document provides a great overview and summary of the general standards, nutrient standards and allowable beverages for your reference (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).

Water

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

- Water is required to be available at no charge to students during the lunch and breakfast meal services. St. Matthias has a water fountain with bottle filler and paper cups for students.
- For more information on the water requirement, see [SP 28-2011](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/gm_sp_28_2011_r.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/gm_sp_28_2011_r.doc)

Food Safety and Storage

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

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

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.
- The current food safety inspection reports must be posted in public view.

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. The temperatures were recorded and documents were kept in an organized binder.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service worker and director 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](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- (TA) The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site. St. Matthias should revise their plan to only include SOPs that apply to their operations and include one for Field Trips. If you begin Breakfast in the Classroom, that would be another SOP.

Food Employee Reporting Agreements

- (TA) 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>). Please include the substitute worker and any teachers who may assist in meal service.
- 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.

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.
- The food safety plan should include an appropriate Standard Operating Procedure for “Time as a Public Health Control.”

Buy American

Comments/Technical Assistance/Compliance Reminders

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

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: “We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract->

management) and Buy American monitoring procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america>).

- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the [SNT Procurement webpage](http://dpi.wi.gov/school-nutrition/procurement/buy-american) (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the notes above for sample certification language. This will be treated as technical assistance for the 2018-19 school year, but work with your distributor/supplier to move toward compliance. The following products were found without a clear country of origin indicated on the product or product packaging:

- Bush’s Texas Ranchero Beans
- Soybean salad oil
- Basil
- Black pepper
- Corn dogs
- Heinz ketchup packets
- Buttermilk ranch dressing packets
- Barilla rotini pasta (made with USA and imported ingredients)

Reporting and Recordkeeping

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- 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.

Summer Food Service Program (SFSP) Outreach

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

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. Matthias School, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area

- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](#) 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

REVIEW AREAS

FINDINGS AND CORRECTIVE ACTION NEEDED

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** A student name was listed on the Benefit Issuance list as free by income but when the income was calculated they would really be eligible for reduced-price meals. The determining official confirmed that the point of service software (Power School) has that student listed as reduced-price and that is how they are being charged and claimed. The application was determined in September, although it is missing the number of household members and the last 4 digits of the social security number or checking the box that the household adult does not have a social security number.
Corrective Action Needed: Contact the household for information to complete the application: the number of household members and the last 4 digits of the social security number or checking the box that the household adult does not have a social security number.
- ❑ **Finding #2:** Meal benefits provided for students on a household application or from a student listed on a direct certification run should be extended to all students in the household. The notification letter to the household may provide a section for parents to include additional students for extension of meal benefits. Please note that benefits from Foster, Homeless, Migrant and Runaway status do not extend to others.
Corrective Action Needed: Submit a statement of the process the determining official will utilize to extend appropriate meal benefits to other students in the household or potentially in a joint custody household.

Findings and Corrective Action Needed: Verification

- ❑ **Finding #3:** The verification process for school year 2018-19 had not been started until the onsite review dates. The process was started on 11-7-18 by completing the sample pool and sampling method to select an application for review this school year. The confirming official signed the application, the tracker was started and the notification letter was sent to the household.
Corrective Action Needed: Submit a statement of the verification process to be used in future school years and that the verifying official will be responsible for completion by the November 15

deadline. Also, submit a copy of the completed tracker form and final verification letter, called “We Have Checked” your application, detailing the results of the process.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

❑ **Finding #4: Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. Student’s trays were pre-plated with all menu items except milk. Students who stated they didn’t want to take the beans were told that they had to. There was no option to decline any of the components except milk.**

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 and all students must take a milk 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.

The [Offer Versus Serve Guidance Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) and the [Offer Versus Serve Webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts) (Offer versus Serve and Offer versus Serve – Meal or No Meal Lesson and Game) can be used as a training resource (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf> and <https://dpi.wi.gov/school-nutrition/training/webcasts>).

Corrective Action Needed: Submit a training plan and signed roster once training has been completed for staff involved in serving and/or determining if reimbursable meals have been selected.

❑ **Finding #5: Daily vegetable shortage- For the first two lunch periods, all students were being served a full $\frac{3}{4}$ cup of beans without the option to decline this item. There were not a sufficient amount of beans sent for a $\frac{3}{4}$ cup serving for each planned meal (under OVS, it would be assumed that some students would decline the vegetable component). Beans ran low by the last lunch period, and after some discussion, the server began asking students if they wanted beans. Many students declined the beans, but students that said yes were only served $\frac{1}{2}$ cup of beans. This resulted in 7 meals where students were not offered a full $\frac{3}{4}$ cup vegetable.**

Corrective Action Needed: Documentation of OVS training requested above will also be sufficient for this finding.

Please note that repeat violations involving daily quantity shortages on future Administrative Reviews may result in fiscal action.

❑ **Finding #6: The production record template for lunch does not meet all of the [production record requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). The following information was missing from the template or incompletely filled in:**

- Planned/actual number of servings
- Leftovers – For the week of review all were recorded as zero. As a reminder, any leftovers should be properly documented.
- Accommodations made for students special dietary needs.

Additionally, the “amount sent” column should be updated to reflect the actual quantity provided to the school. This should include any extras sent or additional meals ordered after the production record has been printed.

Corrective Action Needed: Submit one week of completed production records that fulfill all of the production record requirements.

- ❑ **Finding #7: Sufficient documentation was not provided to credit the grain in the lasagna or the plum.**
Corrective Action Needed: Please submit the weight per sheet for the lasagna noodles. For the plum, there is no size 40 in the Food Buying Guide. Therefore, information regarding the size (that matches a Food Buying Guide entry) or documentation of an in-house yield study is necessary in order to properly credit this item.

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

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #8:** The Annual Financial Report must be completed with actual numbers broken out by program and divided into categories for Revenues and Expenses. 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. Nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
Corrective Action Needed: Please revise the 2017-18 Annual Financial Report with revenues and expenses broken out and not done by a percentage to NSLP and Non-program Foods. Submit a copy to the consultant.
- ❑ **Finding #9:** 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 as of July 1, 2017.
Corrective Action Needed: Provide to the consultant a timeline to complete the Unpaid Meal Charge/Negative Balance Policy and how it will be communicated to all households each school year and to newly enrolled families.

GENERAL PROGRAM COMPLIANCE

Civil Rights

Findings and Corrective Action Needed: Civil Rights

- **Finding #10:** Notification letters to households, program materials and the school website must include the current non-discrimination statement.
Corrective Action Needed: Provide a sample documentation of the revised meal benefit approval and meal benefit denial notification letters and a screen shot of the non-discrimination statement on the school website. **The school website was updated and corrected onsite 11-7-18.**

- **Finding #11:** All SFAs are required to distribute a [Public Release](#) before the start of the school year. This SFA sent to a local grassroots organization and local newspaper recently (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>).
Corrective Action Needed: Provide a statement of how this will be completed before the start of the school year and by whom (title).

- **Finding #12:** Civil Rights training must be completed each year by the school nutrition director and any staff that assist in serving meals, the determining, verifying and confirming officials.
Corrective Action Needed: Watch the presentation and submit the completed an [attendance record](#) of staff who have participated in the civil rights training (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/civil-rights-training-attendance-record.doc>). This is the presentation in [English](#) and [Spanish](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/es_crt_1014.ppt).

- **Finding #13:** 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>).
Corrective Action Needed: Complete the [Civil Rights Self-Evaluation Compliance](#) form and submit to the consultant (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

Findings and Corrective Action Needed: Professional Standards

- **Finding #14:** Training for Professional Standards rule 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 a copy as part of corrective action.

Findings and Corrective Action Needed: Food Safety

- **Finding #15:** Most recent food safety inspection report is not posted in a publicly visible location.
Corrective Action Needed: Post most recent food safety inspection report in location visible to public.
 - Not completed on-site. Submit photo as an attachment to assigned DPI Nutrition Program Consultant via email.

Findings and Corrective Action Needed: Buy American

❑ **Finding #16:** While reviewing product storage at the MCFI production kitchen for compliance with the Buy American provision, fresh mandarin oranges (tangerines) from Chile were found.

Corrective Action Needed: Submit [documentation](#) for an exception to the Buy American provision for the mandarin oranges or documentation for domestic products that will be used in their place (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

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

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

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



With School Nutrition Programs!