

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. Peter Immanuel Lutheran School **Agency Code: 40-7834**

School(s) Reviewed: St. Peter Immanuel Lutheran School

Review Date(s): November 8-9, 2016

Date of Exit Conference: November 9, 2016

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 Wisconsin DPI 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, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- 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 Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the Food Service Director, the Principal, and the food service staff for the courtesies extended to us during the on-site review. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

The Food Service Director has a great attitude and a willingness to learn. It is apparent she is passionate about her job. The entire food service team is providing excellent customer service and the meals were colorful and appetizing. Staff and students were very friendly. It is apparent that the students love eating breakfast and lunch at St. Peter's. The hallway joining the kitchen is lined with notes from students

expressing their gratitude to the food service team at St. Peter's. It was wonderful to see how appreciated the food service employees are at St. Peter's. I was impressed to see the high participation at breakfast and lunch, as well as the Fresh Fruit and Vegetable Program. The cafeteria is a classroom where students learn eating behaviors which can last a lifetime and we thank everyone involved for their commitment to child nutrition efforts. Keep up the great work!

Review Areas

1. Meal Access and Reimbursement: Certification and Benefit Issuance, Verification, Meal Counting and Claiming

Comments/Technical Assistance/Compliance Reminders:

Direct Certification

- As a reminder, you are required to run direct certification minimum of two times a year: once in October and in March.
- The Special Provision Match Report is required in October. For this, you must run DC in October with the total enrollment. Report the total number of 'S' and 'O' codes to DPI. A communication will be sent to the Authorized Representative and the Food Service Director listed on the most current approved contract.

Meal Counting and Claiming

- To ensure correct meal counts are accurately being taken, the counts should be taken at the end of the line when the student has taken a reimbursable meal. There are some helpful forms on the DPI website to use.
- Breakfast: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/pos-breakfast-meal-counts.docx>
- Lunch: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/pos-lunch-meal-counts.doc>
- The Junior and Senior Kindergarten students were being served in the cafeteria for breakfast instead of going through the line like they do for lunch. It's a best practice to have the students go through the line so that they can be offered the food items and can turn down what they do not want, while still taking a reimbursable meal. This will also enable the food service staff and teachers to ensure a reimbursable meal was taken as well as not having to rely on teachers to handle food.

Findings and Corrective Action Needed:

- Finding #1:** Point of Service meal counts were not being taken at the end of the line. Students must be checked off at the end of the meal line. A staff member must be at the end of the line to check that a reimbursable meal was taken. If not, the student must go back through the line to have a reimbursable meal (3 components including one component as a half cup fruit or vegetable). During lunch, students had a colored token with their name on it to signify whether they were taking the first meal or if they were taking the combo meal. A way to ensure accurate counts are being taken would be to use the breakfast and lunch check off sheets listed above. Keep the sheets on a clipboard at the end of the line so teachers can take lunch counts by the milk cooler and by the combo meal line.

Corrective Action Needed: Submit in writing by email of what the new process will be to take meal counts.

2. Meal Pattern and Nutritional Quality: Meal Components and Quantities, Offer versus Serve, Dietary Specifications and Nutrient Analysis

Commendations and Appreciations:

The Food Service Director was very welcoming of us and was open and honest in her communication, helping find the documentation that we still needed, answering questions truthfully, and admitting to what she was unsure about. We greatly appreciate this openness to feedback and technical assistance. We hope that we have been able to provide information and technical assistance in a respectful and kind manner to help the Food Service Director improve her programs. The Food Service Director was receptive to all that we taught her while on site and expressed a willingness to make changes going forward to improve her program. We look forward to seeing the Food Service Director at trainings in the future, where she can continue to broaden her knowledge and understanding of meal pattern and documentation requirements for the School Nutrition Programs.

Technical Assistance and Program Requirement Reminders:

Meal Pattern Requirements

The meal pattern for School Nutrition Programs was updated as part of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010, with most of the updates to the National School Lunch (NSLP) and School Breakfast Programs (SBP) being implemented July 1, 2012. The updated meal pattern eliminated the option for nutrient-based menu planning and dictated new age/grade groups for menu planning (grades K-5, 6-8, K-8, and 9-12). Additionally, it required specific daily and weekly minimum offerings be met for meat/meat alternate and grains for each age/grade group. All grains offered with reimbursable meals must be whole grain-rich. The updated meal pattern requires both fruits and vegetables as separate components, and with weekly requirements outlined for the five required vegetable subgroups (dark green, red/orange, beans/peas, starchy, and other). More information regarding the updated meal pattern is available at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>.

Hard copies of meal pattern tables for breakfast and lunch were provided on-site. These are also available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables>.

It is recommended to simplify serving sizes between grade groupings. Currently, a K-8 meal pattern is used for the most part, but some distinctions in serving size for the entrée are made for the older students. Currently, three different grade groups are documented on the production records but no the differences in serving size are not even documented, so all three age groupings are documented as getting the same serving size. Using a single K-8 meal pattern for all students is recommended to simplify the amount of work for menu planning and production documentation. Keep in mind that the Offer vs. Serve (OVS) policy is in place to minimize food waste, so the younger students can decline some items if they want smaller portions or fewer components than what is offered. See technical assistance about OVS below for more details.

Menu planning worksheets are a helpful tool for ensuring that meal pattern requirements are met at both breakfast and lunch (particularly vegetable subgroup requirements). A menu planning worksheet is available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>. If you move toward using the same meal pattern for all students, the K-8 menu planning worksheet should be used.

Training Recommendations and Resources

It is recommended that the Food Service Director spend some time exploring the School Nutrition Team website. It appears that she has used our website already and accessed resources from it, but due to the vast amount of information that is posted there, it would be beneficial to spend more time exploring each of the different topics and the resources posted. Our website is located at <http://dpi.wi.gov/school-nutrition>.

Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Please regularly check our training webpage for current and upcoming opportunities at <http://dpi.wi.gov/school-nutrition/training>. Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year.

DPI conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Travel and meal expenses are allowable foodservice expenses and may be reimbursed through the school's foodservice fund. It is strongly recommended that all food service staff at St. Peter attend pertinent courses related to menu planning, meal pattern, and nutrition. Information on the dates and locations of these trainings will be posted on the School Nutrition Team (SNT) training website at <http://dpi.wi.gov/school-nutrition/training> later in spring 2017 with dates and locations for summer 2017 sessions. Note that Milwaukee is one of the locations every year.

Production Records

First of all, it is good to see that the Food Service Director is using the SNT's template for breakfast and lunch production records, as using this tool helps ensure that all required information is included. Some of the required information was completely filled out, so the Food Service Director is off to a good start. However, much of the information was not fully completed, in part because the Food Service Director was not sure exactly what all of the columns for information about menu items were asking for. Technical assistance about production records was provided verbally while on site, and a list of required and recommended information to include on production records was provided. The Food Service Director was very receptive to this information and we appreciate her willingness to learn.

The information that was not fully completed on the Food Service Director's production records includes: planned portion size (listed for some but not all items), crediting (not required but is helpful to include on the production record), planned # of servings, actual number of servings prepared, total planned quantity, actual quantity prepared, and leftovers. Note that this information should be documented for all menu items listed on the production record, not just the first menu item.

It is important to remember that production records are designed to guide production. Therefore, they should be filled out before, during, and after meal service to help direct staff on what to prepare, how much to prepare, and how to prepare it. The production record should not just be completed at the end of lunch service.

Milk is not currently documented on the production record. It is required that milk usage is documented daily, by milk type (so, the number of each type of milk that was served should be recorded for both breakfast and lunch on the production records).

It is important to document all foods, beverages, and condiments that are offered on each day's production record. Juice is served every day at breakfast, but it was not recorded on the production records for the week of review (October 3-7, 2016). The same is true for condiments – it is assumed that syrup was probably served with French Toast sticks, but it was not listed on the production record. Note that the total amounts of condiments used should also be recorded on the production records. Note that the specific type of fruit that was served each day should be documented on the production record, rather than just listed "Fruit" or "Fresh fruit."

Crediting Documentation (Nutrition Labels, PFS, CN Labels, Food Buying Guide)

Items that are not processed prior to purchase, such as raw meats, beans, eggs, fruits, vegetables, and milk, can be credited using the USDA *Food Buying Guide* (FBG). It is important to note that the FBG has been updated to reflect changes made with the new meal pattern. The print edition that was sent to schools has not been updated and is currently out of date. For the most accurate information, view or print the FBG at <http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>.

Processed products require a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must 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. It is highly preferred that this documentation is 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, it may not be credited when served as part of the USDA's Child Nutrition Programs. Additionally, remember to collect new product labels annually, as well as updating records when new products are purchased and when product formulations change throughout the school year. More information regarding crediting documentation is available at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>.

Technical assistance was provided while on site about what type of information should be kept from a package and saved as the "label." Ingredients, nutrition facts, and the name of the product at a minimum should be included. Additional crediting documentation is often needed for meat/meat alternate and combination foods. The Food Service Director will collect product labels going forward as she receives products in stock.

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g., turkey sandwich on bread, vegetables with seasonings added during cooking). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA or SNT recipes, especially when substitutions are made. Verbal technical assistance about recipes was provided while on site. More information and resources is available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>. Hard copies of the Standardized Recipe Checklist and Recipe Standardization Steps handouts were provided on site.

OVS

We observed kitchen staff members placing foods on students' trays without allowing students to accept or decline them. Under Offer Versus Serve, students are permitted to decline some of the foods offered in a reimbursable meal. At breakfast, students must select three of four food items, including 1/2 cup fruit or vegetable. Likewise, at lunch, students must select three of five components, including 1/2 cup fruit or vegetable.

Kitchen staff members were somewhat unclear about the Offer Versus Serve (OVS) requirements for breakfast and lunch. Although all students observed at lunch/breakfast took a reimbursable meal, it is important for staff to fully understand the OVS requirements. The current Offer Versus Serve Guidance manual is available on our website: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>.

Signage

It is required to post signage visible to the students that indicates the offered components in each meal and what students must select in order for their meals to count as reimbursable. The breakfast signage should list the three components and the four items offered, and the lunch signage should list the five components and inform the student that under Offer Versus Serve (OVS), he or she must select at least three full components. In both instances, one food item or component must be at least ½ cup fruit, vegetable, or a combination of fruit and vegetable.

There is signage from SNT visible to students at the beginning of the serving line. However, the signage is not filled in for breakfast or lunch. Adequate signage helps ensure that students accurately select a reimbursable meal.

Whole Grains

All grains offered in school meal programs are required to be whole grain-rich. Grains that are not whole grain-rich cannot be credited toward the grain component. Please replace all enriched grain products with whole grain-rich versions, including the Brakebush chicken tenders. A comprehensive whole grain resource created by the USDA can be found at <http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>.

Dietary Specifications (Salt)

The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined a sodium restriction using three targets to allow for a gradual implementation. The first target was implemented July 1, 2014. Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, olives, and processed food items. The use of these products should be closely monitored and limited to meet sodium requirements in this school year and upcoming school years. We also encourage the use of low sodium and no salt added products. Several products in dry storage, including canned vegetables and tomato products, were labeled no salt added. Consider purchasing other products, such as canned soups, with low sodium or no salt added.

Vegetable Subgroups (Red/Orange)

The updated meal pattern, established through the Healthy, Hunger-Free Kids Act of 2010, created separate components for fruits and vegetables and with weekly requirements outlined for the five required vegetable subgroups (dark green, red/orange, beans/peas, starchy, and other). The menu and production records submitted for the week of review include vegetables from the dark green, beans/peas, starchy, and other categories. No vegetables from the red/orange subgroup were listed on the menu, leaving the meal pattern short of the weekly requirement. Vegetables from any subgroup may be served fresh, frozen, or canned. The red/orange subgroup includes carrots, pumpkin, red peppers, salsa, sweet potatoes, tomatoes, and winter squash.

Extras

On the day of on-site meal observation, we noticed that the cookies served at lunch were being used as an incentive or reward for trying vegetables, or extra cookies being given as a reward for cleaning the tables after lunch. Please inform the teachers who are lunchroom monitors that using dessert as an incentive or

reward is not a recommended practice. Students should be encouraged to try vegetables without the incentive of getting a treat for doing so.

Corrective Action:

Meal Pattern Finding 1: As noted above, standardized recipes are required for all menu items that combine at least two ingredients.

Required Corrective Action: Please submit standardized recipes for the following items from the week of review:

- Turkey sandwich on the combo line
- Ham sandwich on the combo line
- Note that bologna is not a creditable meat/meat alternate. These sandwiches should be discontinued.
- Salad that is offered for the combo line
- Chicken noodle soup
- Any other soups that you are serving (provide labels if not prepared from scratch)
- Breakfast sandwich (English muffin with ½ an omelet on it)
- Ham roll up (the recipe that was submitted prior to the review was not standardized)
- Cowboy beans
- Note that when hamburgers are served, both the bun and the hamburger should be recorded on the production record. Otherwise, a “hamburger on a bun” recipe should be provided.
- Corn (including seasonings added)
- Green beans (including seasonings added)

Please submit standardized recipes for the following items from the **day** of review:

- Cheesy potatoes (both hash browns and the scalloped potatoes that we saw)

Meal Pattern Finding 2: Production records from the week of review were incomplete. All information on the template should be documented for all menu items. See technical assistance written above.

Required Corrective Action: Please submit one day of a completed production records for breakfast, lunch, and combo lunch, making sure to include the planned portion size for all items, as well as all other information on the “must have” list.

Meal Pattern Finding 3: Portion sizes were not provided for all menu items from the week of review on the production records; therefore, we were unable to complete our review of meal component quantities for compliance with weekly requirements.

Required Corrective Action: Please provide the planned serving size for the following menu items:

- 10/3/16 : refried beans
- 10/4/16: popcorn chicken, potato wedges
- 10/5/16: cowboy beans
- 10/6/16: tater tots
- 10/7/16: please identify which types of “cold veggies” were offered

Meal Pattern Finding 4: The cocoa crisp rice cereal served on the day of review was not a creditable grain food; it did not contain any grain ingredients (The ingredients were rice sugar, corn syrup, cocoa, salt, malt extract, flavors, and vitamins and minerals). Not only is this product not whole grain-rich, but it is not even a grain food.

Required Corrective Action: Please discontinue serving this item. Submit a label for a new cereal that you will serve instead.

Meal Pattern Finding 5: Labels were not provided prior to the on-site review, with the exception of popcorn chicken and the chicken quesadilla. We were able to obtain product labels for some of the remaining products while on site by searching through cold and dry storage. However, some items were not currently in stock and a label was not able to be obtained.

Required Corrective Action: Please submit copies of labels for the following products (note that for some items like bread products, you may need to contact that manufacturer for product documentation if a label including ingredients, nutrition facts, and weight per serving is not included on the product case). For meat/meat alternate and combination items, a CN label or Product Formulation Statement must be included:

- Chicken legs (CN label or PFS)
- Dinner rolls
- Potato wedges
- Mini corn dogs (CN label or PFS)
- Sliced bread used for combo line sandwiches
- Turkey deli meat used for combo line sandwiches (CN label or PFS)
- Ham deli meat used for combo line sandwiches and breakfast ham roll-up (CN label or PFS)
- Cinnamon rolls
- Turkey bacon (CN label or PFS, if available...item may not be creditable)
- Bagel
- Chicken tenders (served on the day of review; CN label or PFS)

Meal Pattern Finding 6: Because of the extensive amount of missing information (as noted and requested above), we were not able to complete a review of compliance with weekly component requirements for breakfast and lunch. The red/orange subgroup appears to be missing.

Required Corrective Action: Please submit all of the corrective action requested above. Note that the menu will be reviewed for compliance with component quantity requirements once all necessary documentation is obtained. If the menu does not meet all weekly requirements at that time, further corrective action may be required.

3. General Program Compliance: Civil Rights, On-site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in Schools, Professional Standards, Water, Food Safety, Storage and Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach

Civil Rights

USDA Nondiscrimination Statement

- When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was just updated in October 2015 <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>.

However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” so that it can be printed in the same size font as the other printing in the document.

Findings and Corrective Action Needed:

- Finding:** The incorrect USDA non-discrimination statement was on the breakfast and lunch menus.

Corrective Action Needed: Update the breakfast and lunch menus to have the new USDA non-discrimination statement on them: “**This institution is an equal opportunity provider.**” Submit a copy through email or fax of the December breakfast and lunch menus with the new non-discrimination statement.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. This is typically done as a back to school training before school officially starts.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

- Finding:** The Civil Rights training has not been completed for this year.

Corrective Action Needed: Complete this training with all food service staff and anyone involved with the School Nutrition Programs. Scan and email a copy of the sign off sheet, or take a picture of the sheet with your phone and email it.

Civil Rights Self-Compliance Form

- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually.

- Finding:** The Civil Rights Compliance Form was not completed by October 31.

Corrective Action Needed: Complete this form and scan/email or take a picture/email a copy of it.

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.

Content of the Wellness 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. LEAs 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 to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/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>.

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.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- **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	Other Staff	Part Time Staff
	(20 hrs or more/week)	(less than 20 hrs/week)	
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

- ❑ **Finding:** Training hours are not being tracked.

Corrective Action Needed: Begin tracking all training hours for yourself and all food service staff. 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, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Submit an email stating you have started tracking the training hours.

Water

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

Be reminded to put the water cooler and cups out for the students at breakfast, too.

Food Safety, Storage and Buy American

Food Safety Plans

- All schools must have a comprehensive site-specific food safety plan on site which includes all process 1, 2, and 3 items, all standard operating procedures (SOP) for each individual site, all equipment, and food service staff and be reviewed annually. Updated prototype food safety plan templates and SOPs may be found at our website under <http://dpi.wi.gov/school-nutrition/food-safety#fsp>.
- SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria, as applicable.

Reporting and Recordkeeping

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

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. Peter Immanuel Lutheran School, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](#) on the [DPI Summer Meals website](#)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
 - Promotion of the USDA Summer Food website <http://www.fns.usda.gov/summerfoodrocks>.

- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. 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>.

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 dpi.wi.gov/statesupt/agenda-2017.

