

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

School Food Authority: Pathways High, Inc.

Review Date(s): January 22-24, 2019

Agency Code: 408139

Date of Exit Conference: January 29, 2019

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 a nominal charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (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). These strategies are effective and research-based.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Pathways High, Inc. 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 the time taken to respond to the off-site questions, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff at Pathways High, Inc. for their willingness to make changes to meet school meal program regulations. The DPI review team is confident that Pathways High, Inc. will continue to improve its knowledge and operation of the school meals programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

All applications were appropriately approved and denied. All students' eligibilities are maintained and counts are accurately transferred to claims for reimbursement. Direct Certification (DC) is run in the required timeframes and maintained on file at the SFA. The most current Income Eligibility Guidelines are utilized while assessing applications. Thank you!

Technical Assistance/Compliance Reminders:

Application Approval

- SFAs may notify households of benefit approvals written or verbally. However, for the denial of benefits, households *must* receive written notification (via email or mail). Verbal notification is not acceptable for the denial of benefits.
- There are household notification letters for DC and application approval. The DC notification letter differs in that it explains to households that an application for meal benefits would not be required now that their student qualifies for meal benefits via DC.
- The SFA utilizes date stamping when approving applications. This allows schools to qualify students for meal benefits upon receipt of an application rather than waiting for the SFA to approve it. The SFA was not utilizing date stamping correctly. Students' meal eligibility dates were recorded as the date applications were approved instead of recording it as the date the application was received (i.e. when it was date stamped).

Benefit Issuance

- A Benefit Issuance list contains all students who qualify for free and reduced price meal benefits. The information on this list must include the student name, eligibility status, method of eligibility (app, DC, homeless, etc.), and eligibility approval date.
- The exact day students qualify for meal benefits is the approval date listed on the BI list. This is the first day meal benefits will begin for students who qualify.
- If a household submits an application that indicates Other Source Categorical Eligibility (homeless, migrant, or runaway), the SFA must confirm the student's status by an appropriate program official/liaison either through direct contact with the agency or by a list of names provided by the agency. This must happen before meal benefits can be provided.

Extension of Benefits

- The Other Source Categorical Eligibility is only available to the designated student and is **not extended** to other members of the household.
- Applications that indicate a student is a foster student are categorically eligible for free meals. The student's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is **not extended** to other household members.

- A student or other household member’s receipt of benefits from an Assistance Program automatically **extends** eligibility for free benefits to all student who are members of the household. [7 CFR 245.6(b)(7)] Foster student benefits **do not extend** to other students in a household.

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ Finding #1: The Benefit Issuance (BI) list for Pathways High, Inc. listed some students’ names multiple times and included students who did not receive meal benefits (“paid” students). Even though the review team ensured all meal benefits were accurately transferred from applications and DC runs to the software system, the information was not satisfactorily maintained. It is important to maintain an organized benefit issuance system especially in the case of staff turnover.

Corrective Action Needed: Please re-submit the BI list to the consultant assigned to your review. Submit a statement explaining how BI lists going forward will not have multiple eligibilities listed for a single student. Also, please watch the “[Getting Started in F/R Meal Price Eligibility](https://media.dpi.wi.gov/school-nutrition/getting-started-free_reduced-price-meal-eligibility/story_html5.html)” webcast and forward the quiz confirmation email to the consultant assigned to your review (https://media.dpi.wi.gov/school-nutrition/getting-started-free_reduced-price-meal-eligibility/story_html5.html).

Resources:

- [Free and Reduced Meal Price Eligibility webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts#fr) (<https://dpi.wi.gov/school-nutrition/training/webcasts#fr>)
- [DC notification letter](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter.doc>)
- [Application approval letter](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/letter-to-households.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/letter-to-households.doc>)

Verification

Commendations:

Verification was completed by November 15 and the appropriate notification letters were sent to households. The Verification Collection Report (VCR) was also completed prior to the February 1 deadline. Great work!

Technical Assistance:

- **Pathways High, Inc. had a non-response rate above 20% in this 18-19 school year. Therefore, it will have to complete Verification utilizing the Standard Sampling method during the 19-20 school year.**
- The Determining Official (DO) also served as the Confirming Official (CO) during the Verification process. As the application was considered a non-response, there was no need for signatures by the CO or VO. But going forward, please note that the CO and VO only review and sign applications selected for Verification.
- When approving applications and completing the Verification process, there are three officials with important roles: the Determining, Confirming, and Verifying Officials. The Determining

Official (DO) approves and denies applications. The Confirming Official (CO) and Verifying Official are for the Verification process. The DO cannot be the CO, but the DO can be the VO. Each official's signature must be on the backs of applications (CO and VO only on applications that go through the Verification process).

- The Hearing Official (HO) cannot be either the DO, CO, nor the VO.

Resources:

- [DPI's Verification webpage](#) contains all resources needed to complete the Verification process, including, the Verification tracker form and packet, Verification households notification letters, a Verification webcast, and instructions for completing the VCR (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).

Meal Counting and Claiming

Commendations:

Skyward's Accuclaim Reports (Edit Checks) are completed monthly. Counts are appropriately recorded and counts are accurately transferred to claims for reimbursement. Field trip counts are well taken and properly tracked.

Technical Assistance:

- One non-reimbursable meal was observed during lunch service. This meal was taken off the daily counts so there is not fiscal action.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the school nutrition professionals and dedicated staff at Pathways High Inc. We thoroughly appreciate your time and cooperation prior to and during the Administrative Review (AR). Great effort is made to deliver consistent meals in an exceptionally creative and friendly environment. All of the staff were very accommodating.

Thank you, also, to the Food Service Manager and the nutrition professionals at Milwaukee Center for Independence for sending documentation and promptly answering questions both prior to the on-site review and during the on-site review. We very much appreciate all that you do for the students of Pathways High Inc..

Comments/Technical Assistance/Compliance Reminders

Training:

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

Additionally, regular trainings are also offered on the Wisconsin Department of Public Instruction (DPI) webpage as webcasts, webinars, and on-site trainings. Check our [Training](#) webpage often for current and upcoming opportunities (<https://dpi.wi.gov/school-nutrition/training>). Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>).

Dietary Specifications

Currently, various full-sodium and full-fat food items and condiments are served. A few examples include full-sodium beans and full-fat salad dressings and mayonnaise. While some of these foods do not credit towards the meal pattern, they must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium), which may make it difficult to stay within the dietary specification limits if these “extras” are consistently offered on a routine basis. Sodium-free spices, spice blends, and reduced-fat or reduced-sodium condiments are great alternatives.

Vended School Responsibility and Crediting Documentation

Although Pathways High is purchasing meals through a vending agreement, it is ultimately the SFA’s responsibility to ensure all meal pattern requirements are met. Information on lunch meal pattern requirements can be found on the [NSLP Menu Planning](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite.

Crediting documentation should be updated at least twice per year and as new products are purchased or substituted. At the time of onsite review, crediting documentation was available on site, however meals are not regularly checked for accuracy against the crediting documentation, which is highly encouraged.

Offer Versus Serve

Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. In particular, staff was somewhat unclear on the distinction between the ½ cup minimum fruit, vegetable. Or combination required for a reimbursable meal as opposed to the 1 cup minimum requirement for a fruit or vegetable to credit as a full component under OVS for the 9-12 grade group. One non-reimbursable meal was served on day of observation, which consisted of ½ cup beans (which were menued as the daily vegetable, not a meat/meat alternate), ½ cup fruit juice, and 1 cup milk.

Additionally, students are regularly offered a choice between a “small” ½ cup portion or a “regular” 1.0 cup portion of vegetable(s), with the “small” portion being the default option. Vegetables and fruit must be served in 1.0 cup portions to credit as a full component for the 9-12 grade grouping. A ½ cup portion of fruit or vegetable will not credit as a full component; it will only satisfy the ½ cup fruit, vegetable, or combination requirement necessary for building a reimbursable meal.

Defaulting to the “small” portion is, in part, due to the lunch trays in use at Pathways High. When students did select the full 1.0 cup vegetable (beans) serving during onsite observation, no segment of the tray was large enough to accommodate a full 1.0 cup serving of beans. Even when placed in the largest section of the tray, the beans spilled into other sections. This was not well received by the students. Consider changing trays to better suit the planned menu or altering the planned menu to include items that better fit on the trays in use.

Even further, semantics can play a role in food perception and selection. Using terms such as “small” or “regular” does not, in practice, adequately convey the intended NSLP portions and may have unintended consequences, particularly for young adults susceptible to peer pressure and body image concerns. The cafeteria is also a learning space for students; appropriate portion sizing is one of many lessons. Consider rephrasing to “whole” or “half” portions where the default portion is the “whole” portion and students must request the “small” portion. This will help reduce any confusion in selecting foods that will credit as full components under the NSLP and continue to teach students about appropriate portion sizes for fruits and vegetables.

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 Webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) can be used as training resources (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf, https://dpi.wi.gov/school-nutrition/training/webcasts).

Special Dietary Needs

The one non-reimbursable meal observed was served to a student with dietary limitations that restricted the foods this student could select. The student did not have an Individualized Education Plan (IEP), 504 plan, or signed medical statement on file. Students seeking accommodations for a diet-related disability must provide a medical statement signed by a licensed medical practitioner (such as a physician, nurse practitioner, or physician assistant). The signed medical statement must include a description of the child’s physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child’s diet, and an explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted). More information regarding accommodating special dietary needs, including a medical statement template, can be found on the [Special Dietary Needs](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs)

Portion Tools

Per onsite observation at vending facility, weighing and measuring occurs during food preparation at the offsite satellite kitchen. However, it may be beneficial to staff to utilize a small, digital scale. For example, on 1/22/19, a kitchen staff member was weighing cheese into bags for delivery to various locations. The mechanical (spring) scale in use was not precise to the ounce, so the employee loaded extra cheese into bags to ensure that more than enough was sent. While this does not cause food shortages, it does cause food waste and excess food cost, which could be avoided with updated tools.

Smart Snacks

At the time of the on-site review there were no competitive foods or beverages sold at Pathways High. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

MEAL PATTERN AND NUTRITIONAL QUALITY FINDINGS AND CORRECTIVE ACTION NEEDED

Finding #2: OVS. One non-reimbursable lunch was served on 1/22/19. Have staff responsible for determining reimbursable meals attend a training* on OVS.

Corrective Action: Finding #2 Please submit details regarding when and where the training was held, who attended, and how the training was conducted. Please include a roster for completed OVS training.

*The [lunch meal pattern](http://dpi.wi.gov/school-nutrition/training/webcasts#lunch) (<http://dpi.wi.gov/school-nutrition/training/webcasts#lunch>) and [OVS](http://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (<http://dpi.wi.gov/school-nutrition/training/webcasts#ovs>) webcasts may be used, or another training of your choosing.

BUY AMERICAN

Comments/Technical Assistance/Compliance Reminders

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- 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 the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Many products do not list country or origin or simply have information such as “marketed by” or “distributed by,” which makes identifying compliance or non-compliance with the Buy American provision challenging. If no country of origin is identified on the label, then the SFA must get certification from the distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.” This can accepted within an email.
- More information on the Buy American requirement as well as a suggested non-compliant tracking tool template can be found on the Buy American webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- Products without country of origin labels should also be tracked or verified through the distributor that they are indeed Buy American compliant. Products without country of origin label found at the offsite storage facility (vending facility):
 - Uncle Ben’s Brown Rice
 - Heinz Ketchup
 - Heinz Mustard
 - Catilla Whole Wheat Tortilla

3. RESOURCE MANAGEMENT

As the Resource Management Assessment Tool and Risk Indicator Tool were incomplete prior to the on-site review, a comprehensive review in all four areas (Non-profit School Food Service Account, Paid Lunch Equity, Non-program Foods, and Indirect Costs) of Resource Management were required. **The review of Non-profit School Food Service Account could not be completed. Please see finding 4.**

Non-profit School Food Service Account

Technical Assistance:

Annual Financial Report

- Adult meals and extra milks are considered Non-Program Foods and must be recorded as such on the Annual Financial Report (AFR).
- The entitlement value of USDA Foods (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP. Any handling and processing fees must be recorded as a School *Purchased Services* Expenditure.
 - 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 webpage](https://dpi.wi.gov/nutrition/online-services) (dpi.wi.gov/nutrition/online-services).

Compliance Reminders:

- The Unpaid Meal Charge Policy must be made available to all households in writing at the beginning of the school year.

Findings and Corrective Action Needed: Non-profit School Food Service Account

❑ Finding #3: With staff turnover, it is unclear as to who involved with food service will be aiding the business manager with the AFR and other aspects of the non-profit food service account going forward.

Corrective Action Needed: Please provide written procedures detailing how food service and the business manager will work together regarding program operations to ensure accuracy. Submit these procedures to the consultant assigned to your review.

❑ Finding #4: A comprehensive Resource Management review was required for Pathways High, Inc. The review of Non-profit School Food Service Account (Fund 50) could not be completed. The general ledger for school year 17-18 listed \$0 for all food service expenditure categories. Additionally, the only revenues recorded on this ledger were state and federal reimbursement. USDA Foods entitlement values and processing and handling fees were not recorded. The AFR is meant to be a reflection of the Fund 50 ledger, but currently, these two do not match at Pathways.

Corrective Action Needed: In order to complete the comprehensive review, please provide a month of detailed revenues and expenditures from Fund 50 for any month in school year 17-18. Submit the month of details and a revised 17-18 general ledger to the consultant assigned to your review.

Resources:

- DPI SNT's [Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)
- For more information on allowable expenditures to Fund 50, please see the [AFR Expenditure Categories](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-

categories-for-food-service-annual-financial-report.doc).

- For more information on revenues and expenditures for the AFR, please see the [AFR In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx).

Paid Lunch Equity (PLE)

Pathways High, Inc. was not required to raise its lunch prices for the 18-19 school year due to a positive or zero food service fund balance as of January 31, 2018.

Revenue from Non-program Foods

Commendations:

Adult meals and milks only are the only non-program foods served at Pathways High, Inc. Adult meals are priced appropriately.

Compliance Reminders:

- If ever the SFA decides to sell non-program foods beyond adult meals and milks only, the [Non-Program Foods Revenue Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) would need to be completed (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx). This tool ensures all costs of non-program foods are covered by their revenue.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

- The Civil Rights Self-Compliance form (PI-1441) must be completed by to October 31 annually.

Compliance Reminders:

- Civil Rights Training is to be completed for all staff working with the programs. Please ensure that all staff involved in the meal programs complete the Civil Rights training **annually** as well as sign-off on the participation form.
- All program materials and information that is made public (posted, sent to households) **must** contain the USDA Non-Discrimination Statement. There is a shortened version available if the longer version does not fit on program materials: ***This institution is an equal opportunity provider.***

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements.
- School food service staff may make food substitutions, at their discretion, to accommodate student **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.

Findings and Corrective Action Needed: Civil Rights

Finding #5: Meal prices were visible on the POS screen with the prices of each student's meal. If a student qualified for free meals, \$0.00 appeared; if the student did not qualify for meal benefits, \$3.35 appeared. This is considered overt identification of student meal benefits and must be corrected.

Corrective Action Needed: Please submit a photo or screen capture once this issue is corrected and submit it to the consultant assigned to your review.

Finding #6: The Hearing Official and one food service employee did not complete the annual Civil Rights training.

Corrective Action Needed: Please have the HO and food service employee complete the Civil Rights training and submit the sign-off attendance sheet to the consultant assigned to your review.

Finding #7: The non-discrimination statement is not LWP nor is it on the Unpaid Meal Charge policy.

Corrective Action Needed: Please update these documents to contain this statement and submit them to the consultant assigned to your review.

Resources:

- [Special Dietary Needs Medical Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs)
- [USDA Non-Discrimination Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights)

Local Wellness Policy

Commendations:

Pathway High, Inc.'s Local Wellness Policy (LWP) includes all required areas. Thank you!

Technical Assistance:

- A LWP is in place to set the standard for student, school, and community wellness. Develop your policy to include specific goals for your school and assess these goals annually to ensure your school is promoting local wellness to the best of its ability.

- A LWP committee must be established to annually revise and assess the school’s LWP. This committee can include anyone from the school and community including students, staff, and parents.
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Professional Standards

Commendations:

All staff have completed or are on their way to completing the annual training requirements. All trainings are properly tracked for each employee.

Technical Assistance:

- Professional Standards training completion and tracking is required for all food service employees. It is recommended that teachers administering WSDMP, paid and volunteer cafeteria aides, and student workers complete job-specific training and annual civil rights training. For more information, please reference the [Professional Standards Training Requirement sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf).
 - A program "director" is the person designated to perform or oversee the majority of the program duties (sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management).
 - Annual training hour requirements are as follows:
 - Food Service Director: 12 hours
 - Food Service Manager: 10 hours
 - Full-time Food Service Staff: 6 hours
 - Part-time Food Service Staff: 4 hours
 - There are hiring requirements specific to food service directors. These requirements include education, school nutrition experience, and food safety training specifications. Reference the [Hiring Requirements for Food Service Directors](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) for more details (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf).
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Food Safety and Storage

Commendations:

The food safety plan was site-specific and contained all required components. No storage violations were observed on site. Two food safety inspections were completed in the previous school year.

Compliance Reminders:

- Food Safety Plans are to be reviewed annually and should only contain information specific to the SFA’s operations. Some required components of a food safety plan include: Process 1, 2, and 3 menu items, Employee Reporting Agreements, applicable SOPs, and a site-specific equipment list.

<p><u>Findings and Corrective Action Needed: Food Safety and Storage</u></p>
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Finding #8: A Standard Operating Procedure (SOP) is not in place for field trip meals.

Corrective Action Needed: Please create a SOP for field trips (utilizing DPI's template) and have it approved by your local sanitarian. Submit this to the consultant assigned to your review.

Finding #9: The most recent food safety inspection was not posted in a publicly visible location.

Corrective Action Needed: *Corrected on site. No further action required.*

Resources:

- DPI's [Field Trip SOP](https://dpi.wi.gov/school-nutrition/food-safety) (https://dpi.wi.gov/school-nutrition/food-safety)
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Reporting and Recordkeeping

Commendations:

The Paid Lunch Price (PLP) report, VCR, FNS-10 report, and AFR were all completed. Thank you!

Technical Assistance:

- All records must be kept for three years plus the current school year and temperature logs must be kept for a minimum of six-month.

Resources:

- The general [Calendar of Requirements](https://dpi.wi.gov/school-nutrition/calendar-of-requirements) may be referenced for all daily, monthly, and annual program requirements (https://dpi.wi.gov/school-nutrition/calendar-of-requirements).
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School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach

Commendations:

SBP Outreach was completed at the beginning of the school year, as required. Thank you!

Compliance Reminders:

A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, **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 webpage](http://www.fns.usda.gov/summerfoodrocks) (http://www.fns.usda.gov/summerfoodrocks)

Findings and Corrective Action Needed: SBP and SFSP Outreach

❑ **Finding #10:** SFSP Outreach was not completed. This is required prior to the end of the academic school year to ensure students have access to free meals during the summer months.

Corrective Action Needed: Please submit draft outreach information (poster within *Resources*) and a statement of understanding that this is to be sent prior to the end of the academic year. Send these items to the consultant assigned to your review.

Resources:

- [SFSP Outreach poster](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/doc/Summer%20Food%20Summer%20Fun%20Postcard.docx) (https://dpi.wi.gov/sites/default/files/imce/community-nutrition/doc/Summer%20Food%20Summer%20Fun%20Postcard.docx)
- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

5. COMMUNITY ELIGIBILITY PROVISION (CEP)

In order to participate as a CEP, Pathways High, Inc. must have an Identified Student Percentage (ISP) of at least 40 percent based on data as of April 1st of the prior school year. The SFA may be notified by DPI in the spring if they qualify or are close to qualifying. If the SFA is not contacted, it may still submit a CEP application. The SFA must run DC on or as close to April 1, 2019 as possible. This information will be used to complete the application for the 19-20 school year.

Pathways High, Inc. must also serve both breakfast and lunch at no cost to all students for four consecutive school years. The SFA must also cover any of the costs of providing meals above the amount provided in Federal assistance with non-Federal funds.

Resources:

- [CEP webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility)
- [CEP In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-advanced-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-advanced-nutshell.pdf)
- [CEP Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf)
- [CEP Application](https://dpi.wi.gov/sites/default/files/imce/forms/xls/f6304.xlsx) (https://dpi.wi.gov/sites/default/files/imce/forms/xls/f6304.xlsx)
- CEP Contacts: [Kirsten Voss](#) (608-267-9132) and [Jessica Lessner](#) (608-267-2293)

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every student 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 Student a Graduate](https://dpi.wi.gov/statesupt/every-student-graduate) webpage (<https://dpi.wi.gov/statesupt/every-student-graduate>).



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