

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Carter's Christian Academy, Inc.

Agency Code: 40-9857

School(s) Reviewed: Carter's Christian Academy on 35th Street

Review Date(s): Tuesday, February 28 – Wednesday, March 1, 2017

Date of Exit Conference: Wednesday, March 1, 2017

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. The Milwaukee location is Alverno College from August 8-10, 2017.
- 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 staff at Carter's Christian Academy, Inc. for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing 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.

There were many documents prepared when we arrived at the SFA; all were in an organized manner. The staff was interested in learning to complete tasks correctly and look for more training opportunities. Many staff members work together to serve the students and recently added the After School Snack Program to accompany the enrichment activities.

Members from this school have attended trainings lead by the School Nutrition Team (SNT) at the Department of Public Instruction (DPI). We appreciate the time spent learning new topics to help your programs do more for your students.

Thank you for adding the Afterschool Snack Program in January to help provide more nourishment to your students.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- Thank you for running the Direct Certification match early in the school year.
- Great job using the DPI template letter to inform households that the SFA provides free meals to all students through Community Eligibility Provision (CEP).
- The Public Release is sent out to many entities.
- The Verification Collection Report was conducted in the correct time frame.

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- This School Food Authority (SFA) operates under the Community Eligibility Provision (CEP). They run Direct Certification to establish the identified student percentage (ISP) and claiming percentage. Since they do not accept meal benefit applications, there is no certification process.
- Please be aware that when you use the Alternate Household Application to gather family income for your SFA, the time spent on this process may not be paid by the food service department. A time study would be done and the time spent by a food service worker would need to be paid by a general fund and not charged to food service.

Limited English Proficiency (LEP)

- Communications with households concerning meal benefits must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- To assist SFAs in reaching households with limited English proficiency, the DPI School Nutrition Team (SNT) provides some materials in English, Spanish, Hmong and Albanian.
- The nonprofit food service account may be used to pay for translation services for food service purposes if there is a need to translate materials in a language that is not currently available.

Transferring Students

- 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 share the CEP eligibility determinations when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of one time a year with your full enrollment for the Special Provision Match. You may choose to run more often for other funding reports. The DC runs must include a school code for each location.
- Please remember to follow up on any students with an error code as referenced here: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-codes.pdf>. This will help to match more students/families.
- Since you have 2 school sites, please identify students by site in your Direct Certification document upload to the state site.
- Your SFA will need to run DC many times, at least once a month, during the 2017-18 school year to renew CEP for the 2018-19 School Year.

Meal Counting and Claiming

- When entering the claim, it is necessary to use the edit check to calculate your reimbursable meals by school site for consolidation. Please review the number of students eligible at each site and the maximum expected after taking the attendance factor into account.
- 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.

Findings and Corrective Action Needed

Meal Counting and Claiming

- ❑ **Finding #1:** The CEP check-off sheets were tallied at each site, combined and entered for the breakfast and lunch meal claims. When I verified the counts against the claim, there were discrepancies on several days by a few meals. In the end, the total was not that far off from the edit check sheet, but I would ask for you to double check the counts by more than one person.

Corrective Action Needed: Please provide a statement of how this process will be perfected at each site I and II to provide correct counts and then double checked by the food service director before preparing the claim. Fiscal action will be taken on the errors identified and that total will be provided in the final Closure Letter to the SFA.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff for providing their cooperation in providing documentation and implementing some changes as discussed prior to the review. Staff is making an effort to ensure regulations are met by having recipes and documentation on file and completing menu planning worksheets each week. While some changes are needed, the willingness to learn was apparent and appreciated. Positive attitudes and excellent customer service make for a well-run program. Thank you for all you do to serve the students at Carter's Christian Academy!

Comments/Technical Assistance/Compliance Reminders

Offer Versus Serve (OVS):

- OVS is only required for 9-12 graders at lunch, and is optional for K-8 students at lunch and all students at breakfast. Prior to the on-site review, all students at the 35th Street location had OVS at breakfast and lunch. However, based on pre-review discussions of OVS requirements, these practices were changed. Current operations now include OVS only for 9-10 lunch; 6-8 lunch as well as 6-10 breakfast are all no OVS.
- As a reminder, with no OVS, students must take all planned menu items in their full serving size.

Weight vs. volume:

- Unless an item is physically weighed, the serving size should most likely be recorded on the production records and/or standardized recipe as a volume. Spoodles measure volume, so while it may be labeled a 4 oz spoodle, this actually indicates that it holds 4 *fluid* ounces or ½ cup. It doesn't mean that the serving provided will necessarily weigh 4 oz.
- Fruit and vegetable serving sizes should be documented as a volume measure for consistency with meal pattern requirements.

Standardized recipes:

- Standardized recipes are required for all menu items that have *more than one* ingredient. 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 to reflect the products and practices that are used in your kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates were provided prior to the review and can be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.
- In order to properly determine how a serving of a recipe credits towards meal pattern requirements, it is necessary to accurately determine the recipe yield rather than rounding or estimating that the recipe provides 200 servings.

Production records:

- Currently, the production records being used do not document all of the required information. While there is not a certain template that must be used, it will be necessary to either update the

current template or switch to a new production record template. A new template may help to streamline documentation and ensure that all requirements are being met. The list of production record requirements, instructions, and templates are available on our website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/production-records>.

- If choosing to use a template from our website, the two-grade group (6-8 and 9-10) would likely work best. For breakfast, if you choose to offer all students the same menu and portion sizes, the single grade group template would be acceptable.
- Production records are intended to be useful tools to record information prior to production, during production, and following production. This information can help provide information for forecasting quantities to prepare when the menu is served again.

Crediting:

- When calculating crediting for items or recipes, it is important to always round down. For fruits and vegetables, round down to the nearest 1/8 cup. For grains and meat/meat alternates, round down to the nearest 0.25 ounce equivalent (oz eq).
- Grains can be credited based on weight using Exhibit A of the USDA Food Buying Guide (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf). Alternatively, a manufacturer may provide a signed product formulation statement (PFS) that lists the grams of creditable grain in the product. This number can be divided by 16 grams per ounce equivalent to get the grain contribution for that product.
- All grains offered in school meal programs are required to be whole grain-rich (WGR). Grains that are not whole grain-rich cannot be credited toward the grain component. The USDA Whole Grain Resource may help to provide guidance on determining if a product is WGR: <https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>.
- The USDA Food Buying Guide for Child Nutrition Programs contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods.) Foods not listed in the Food Buying Guide require further documentation (a Child Nutrition (CN) label or a product formulation statement) clearly detailing the ingredients and their creditable quantities in order to be served in Child Nutrition Programs.
- 4 fluid ounce cups are being used to pre-portion fruit servings. While staff did a good job of filling the cups, it is difficult to fit a full ½ cup serving into a 4 fluid ounce container. This is especially true when using sliced peaches/pears as they are less compact than diced fruit. It is recommended that a 5-6oz cup is used instead.
- The hamburger and hot dog buns being used at 1.5 oz eq of grain. As 9-10 students were previously being served 2 hot dogs or hamburgers, they were meeting the daily minimum requirements for grain. However, when decreasing the serving size to 1 hot dog or hamburger, these students would not be meeting the daily minimum requirement. Therefore, either an additional 0.5 oz eq of grain should be offered or a larger bun should be procured. A 2 oz hamburger bun rather than adding a grain would help to decrease food cost (a 2 oz hot dog bun is less commonly available).

Vegetable subgroups:

- The updated meal pattern has created separate components for fruits and vegetables and has outlined weekly requirements for the five required vegetable subgroups (dark green, red/orange, beans/peas, starchy, and other). The planned menu submitted for the week of review was very heavy in starchy vegetables and failed to meet the weekly requirements for the dark green, red/orange and other subgroups.

- In order to ensure subgroup requirements are met, it is important to ensure that vegetables are categorized into the correct subgroup. For example, sweet peas, corn, scalloped potatoes, tater tots and French fries are all starchy, while green beans fall into the ‘other’ vegetable subgroup.
- The vegetable section of the Food Buying Guide can be helpful in determining subgroups. Additionally, this resource identifies some common vegetables in each subgroup: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>
- Leafy greens credit for half the volume served in their fresh form. For example, a ½ cup of fresh baby spinach would credit as ¼ cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces even if they are not in the dark green subgroup. If dark green vegetables are cooked, such as steamed spinach, they can credit as the actual volume served.

Dietary specifications:

- Being conscious of the dietary specifications of the meal pattern, it is recommended that added butter, salt and sugar is limited as much as possible. It is recommended that recipes such as oatmeal, sweet peas, corn, green beans, tomato soup, etc. be revised and re-standardized to reduce or eliminate the added butter, sugar and salt.

Training:

- Ongoing training is essential to staying informed of school meal requirements. It is strongly recommended that in addition to attending SNSDC, you utilize the SNT website for resources, including training webcasts that can be watched at your convenience. A list of all available training webcasts can be found at <http://dpi.wi.gov/school-nutrition/training/webcasts>.

Findings and Corrective Action Needed

Finding #1-Meals: All standardized recipes submitted listed an estimated yield of 200 servings rather than the exact yield of the recipe, therefore the recipes could not be accurately credited.

Corrective Action Needed: Please provide updated standardized recipes for the following:

- Toasted cheese sandwich
- Tomato soup
- Corn (with salt, pepper, butter, water)
- Baked beans
- Scalloped potatoes
- Sweet peas (with sugar, butter, water)
- Green beans (with dehydrated onions, salt, pepper, water, butter)

Finding #2-Meals: Production Records did not include the planned number of servings for each item by grade group, clear serving sizes for vegetables by grade group, specific milk types offered (only said chocolate and white, but should also list fat content), leftovers, condiments.

Corrective Action Needed: Please submit one week of completed production records to show that a new or updated template is being used and meets all production record requirements outlined on the list provided.

Finding #3-Meals: The following items were found to be non-WGR:

- Poptarts
- Rice
- French toast sticks
- Corn chips

Corrective Action Needed: Please submit a nutrition fact label for the products you plan to use in place of the non-WGR products listed above. A CN label or PFS is also needed to document crediting for the french toast sticks. (You may choose to find a 2 oz hamburger bun, in which case the corn chips would no longer need to be offered. If you choose this option, please submit a nutrition fact label for the new bun.)

Note: New WGR poptart was purchased and served during the on-site review. No additional documentation needed for this product.

Finding #4-Meals: There was a vegetable shortage for 6-8 on Wednesday during the week of review. They were offered ¼ cup of romaine (1/8 cup creditable vegetable), ¼ cup diced tomato and ¼ cup French fries, totaling 5/8 cup.

Corrective Action Needed: In order to meet the ¾ cup daily minimum requirement, the serving size for romaine will be increased to ½ cup (1/4 cup creditable vegetable). This was discussed prior to the review, **no further action needed.**

Finding #5-Meals: The planned menu did not meet the weekly minimum requirements for the dark green, red/orange or other vegetables subgroups.

Corrective Action Needed: Please submit a written statement describing your plans for correcting the menu to ensure all subgroup requirements are met. The statement should be specific and outline the changes to be made; you may choose to add additional vegetables (include what vegetable, the day of the week it would be added, and serving size) or increase the serving size of a vegetable already planned.

- Dark green: increase the serving size for romaine on Wednesday to ½ cup (crediting as ¼ cup dark green vegetable) – no additional statement needed for the dark green subgroup.
- Red/orange:
- Other:

Finding #6-Meals: The National School Lunch Program regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at breakfast and lunch. When implementing Offer Versus Serve (OVS), schools must also identify what a student must select in order to have a reimbursable meal. Samples of signage that can be printed or updated and implemented in your school were left onsite and can be found at: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>.

Corrective Action Needed: Please submit copies of the signage that you have posted and/or a picture of the signage in the cafeteria.

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. Thank you.

3. RESOURCE MANAGEMENT

Comments/Technical Assistance/Compliance Reminders

- The school nutrition director gathers and verifies food service invoices then gives them to an off-site accountant. That accountant provides the information to the director to prepare the Annual Financial Report annually.
- The labor costs seem to be excessive and the time staff is onsite seems heavy; perhaps this is because the lunch meal service time has four periods for serving. More batch cooking or preparing between meal service times may assist in less labor time for the two servers.
- Please determine which workers are being paid from food service funds. You may also need to look at your food procurement practices to see if you are getting the most competitive price for food and milk.
- The federal and state reimbursements and the USDA Foods entitlement value should cover the cost of preparing and serving the meal to students.

Nonprofit School Food Service Account

- The SFA's Child Nutrition program report provides a compilation of meals claimed, the reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch, breakfast or other programs. The Aids Register tracks all program deposits made to the SFA's account and the amount deducted from the reimbursement to pay for shipping, handling and processing costs of USDA Foods. These may be found on our Online Services webpage: <http://dpi.wi.gov/nutrition/online-services>.
- SFAs must limit the net cash resources in order to not exceed three months average expenditures. 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".

Annual Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance on June 30 can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00. The SFA may need to look at ways to

keep the expenses closer to the revenues received from USDA and state reimbursements, plus the USDA Foods entitlement value.

- Please be sure to identify expenses by program: National School Lunch (NSLP), School Breakfast Program (SBP) and now After School Snack Program (ASP or Snack). Pay attention to separating food, labor and any extras in those categories.
- When tracking revenues and expenditures, please keep in mind:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “A la Carte”, you should be reporting 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 would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to 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 a food expenditure.

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>.
- 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. SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.
- 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**, by July 1, 2017. For a snap-shot on what the policy must include, see the Unpaid Meal Charges “In a Nutshell” at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>. For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>, including:
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Revenue from Non-program Foods

- **Non-program Foods Revenue Rule SP-20-2016**
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>

- Non-program Foods “In a Nutshell” <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
- At this point, your SFA does not sell anything to students and does not sell any Nonprogram foods, like Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), and Catered Meals. Should that change and you have sales, please remember to complete the Nonprogram Foods tool, annually.

To document non-program food compliance with the Federal regulation, the USDA Non-program Foods Revenue Tool would need to be completed. To do this, the SFA must select a reference period of at least 5 consecutive operating days of a regular school week, and compare the reference period revenue ratio to the food cost ratio to determine if the revenue ratio is equal to or greater than the food cost ratio. SFAs must separate their non-program food costs from their program food costs for the selected period to complete the Non-program Foods Revenue Tool. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance.

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

Findings and Corrective Action Needed:

Risk Assessment for Resource Management – Maintenance of the Nonprofit School Food Service Account

- ❑ **Finding #2:** This SFA flagged for a Comprehensive Resource Management Review in this area because the School Year 2015-16 expenses exceeded the revenues, requiring a fund transfer from the general school fund or some other non-federal funds. The Annual Financial Report did not show this transfer, so I will need to see all documentation to identify this transaction. The SFA may need to look at alternate ways to keep costs in line with revenues.

Corrective Action Needed: Please send documentation to show the financial transaction(s) which cover the negative balance from last year, School Year 2015-16. Please explain that the school is willing to cover this cost in future years.

- ❑ **Finding #3:** To provide me the documents needed for this financial management section (Maintenance of the Nonprofit School Food Service Account), please provide answers or documents for the following:

1. Submit a **Summary** Report of Revenues and Expenditures from July 1, 2015-June 30, 2016 used to complete the Food Service Annual Financial Report.
2. How does the SFA ensure that only allowable costs are charged to the nonprofit school food service account (e.g. staff training, the implementation of checks and balances/internal controls, etc.)?
Explain how expenditures are authorized and how only those costs applicable to the nonprofit food service account are recorded (e.g., Does someone prepare a requisition for food purchases? Does someone review employee time cards before payroll is paid? Does someone review invoices to be sure that the goods were received before the payment is made)?
3. Submit a *detailed* expense report (general ledger) for one month including all categories (e.g. labor, food, equipment, supplies, and purchased services) from the 2015-16 SY.
4. Include a short explanation of the account codes used for documenting revenues and expenditures in your financial accounting system.

5. What charges are placed in the categories of “Other” and “Purchased Service” expenses?

Corrective Action Needed: Please send documentation to these above points.

4. GENERAL PROGRAM COMPLIANCE

Commendations

- We appreciated that the lunch room area had the food safety inspection and the new “And Justice for All” posters posted on the cafeteria wall so the public can read the information.
- The Public Release is sent to several local newspaper and television outlets, plus grassroots organizations.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.
- Food safety inspection reports are posted in public view.
- A letter is sent to parents with the background and some resources outlining the Local Wellness Policy (LWP). It would be better for this SFA to provide the current LWP as a notice to households, annually.
- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

Nondiscrimination Statement

- When including the nondiscrimination statement 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 printed menus, only this 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.

Public Release

- Please provide the Public Release to several grassroots organizations, like food pantry, church, library or other places that families you want to target would visit.

Civil Rights Self-Compliance Form

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

Special Dietary Needs

- 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, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide the nutrition information from the product you will

be using. For more information on fluid milk substitutes, please see our website:

<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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. You may use the prototype Medical Statement for Special Dietary Needs posted on our website which is also available in Spanish and Hmong: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to a students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the DPI School Nutrition Team website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner 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.
- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow's milk and pre-approved through DPI. Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use. See SP 07-2010 for more information: https://www.fns.usda.gov/sites/default/files/SP_07_CACFP_04_SFSP_05-2010_os.pdf.

Processes for complaints

- All SFAs should have procedures (written procedures preferred) for receiving and processing any complaints alleging discrimination within 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. The form to assist in filing these complaints can be found on the DPI SNT website at https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf.

On-site Monitoring

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.

The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program (SBP) beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed

once every two years. For more information see USDA memo SP 56-2016
<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.

- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility> under the resources for currently participating sites section.

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 with full compliance of 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 the process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment results 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:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/LWP%20Summary%20-%20Final%20Rule.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>.

Smart Snacks in Schools

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that is effective July 1, 2014. This SFA doesn’t sell anything to students.

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 and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, 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>.
- **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

Water

Water is required to be available at no charge to students during the lunch and breakfast meal services and during the Afterschool Snack period. Schools can provide free water in a variety of ways, but students must be allowed access in the meal serving area.

Food Safety, Storage and Buy American

Food Safety Inspections

- Every school operating USDA School Child Nutrition programs, must have two food safety inspections during each school year.

Temperatures

- All pieces of cooling equipment must have the internal temperature taken and recorded daily on a temperature log.

Food Safety Plans

- The Food Safety Plan was available for review. All temperature 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 standard operating procedures (SOP) for each individual site, all equipment, and food service staff and be reviewed yearly. Updated prototype food safety plan templates and SOPs may be found at our website under <http://dpi.wi.gov/school-nutrition/food-safety>
- 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.
- Thank you for maintaining a Food Safety plan with equipment, temperature logs and Standard Operating Procedures (SOP). Please list the foods in Process 1-2-3 and add to the Food Safety Plan.
- All food service employees have signed an Employee Reporting Agreement and it is kept on file.
- Milk out of mechanical refrigeration for meal service may not be kept unless you have an acceptable signed SOP agreement with your county sanitarian. The DPI webpage have resources in this area: <https://dpi.wi.gov/school-nutrition/food-safety>
- Temperature logs for equipment and foods are being kept in a binder. Please invest in new thermometers for your cold equipment and check the accuracy in your temperatures. If there continues to be a concern, please contact a refrigeration repair person.
- The USDA FNS Office of Food Safety is excited to share a new educational resource for school nutrition professionals. *A Flash of Food Safety* is an educational video series designed to help busy school nutrition professionals understand and practically apply safe food practices. The videos, available in English and Spanish, address five food safety topics: *Handwashing: Why to Wash Your Hands*, *Handwashing: How to Wash Your Hands*, *Calibrating a Thermometer: Ice Water Method*, *Calibrating a Thermometer: Boiling Water Method*, and *Active Cooling with a Chill Stick*.
- Each “flash” video is 2-4 minutes long and can be accessed online via YouTube. They are easy to view from a desktop, laptop, tablet or smart phone – perfect for onsite training! Individuals can earn 15 minutes (1/4 hour) of continuing education for [Professional Standards](#) when they watch all five videos in the series. A certificate of completion is available through the USDA FNS Office of Food Safety website, *A Flash of Food Safety* or visit www.fns.usda.gov/ofs/food-safety-flashes.

Storage

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

Buy American

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

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

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.

Reporting and Recordkeeping

- 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.

SBP and SFSP Outreach

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.
- School Breakfast is promoted in the registration packet, monthly menus and throughout the year in the newsletter.

Summer Meals

- As part of the National School Lunch Program, a Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. 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>.

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

- ❑ **Finding #4:** Per the Professional Standards rule, continuing education or training hours for school nutrition staff must be tracked annually and available for the administrative review process. There are several tracking tool templates or you may create your own process to list the name of staff person, date hired, title/position, and status (number of hours to determine if they are scheduled for 20 hours or more per week).

Corrective Action Needed: Please submit a statement of the process you will use to track Professional Standards trainings for all school nutrition staff members.

Corrective Action Needed:

- ❑ **Finding #5:** The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program (SBP) beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo SP 56-2016
<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.

Corrective Action Needed: Please submit the Breakfast Onsite Monitoring form when completed for one of your Breakfast sites. COMPLETED 3/1/17 onsite; **no further action required**.

- ❑ **Finding #6:** All Food Safety Plans must include a list of foods designated as Process 1, 2 or 3 to identify with the SOPs that apply to those processes.

Corrective Action Needed: Please complete the list of Process 1-2-3 foods to submit to me. Thank you.

- ❑ **Finding #7:** Several items in food storage areas were found to be a product of another country than United States. Please check to see if your food suppliers offer a similar acceptable product of the USA. If that is not available, please complete a non-compliant product form and keep on file. This needs to be reviewed often as product availability and growing seasons change rapidly. More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

Corrective Action Needed: Please submit your findings to the nutrition program consultant.

5. OTHER FEDERAL PROGRAMS REVIEWS – AFTERSCHOOL SNACK

Commendations

- Area Eligible Afterschool Snacks are all claimed at the free rate. The claim was acceptable.

- Thank you for recognizing that you need $\frac{3}{4}$ cup or 6 fl. oz. when offering a fruit or vegetable component.

Comments/Technical Assistance/Compliance Reminders

- Please check your items for crediting compliance in the Afterschool Snack program, especially grain products.
- Each site participating in the Afterschool Snack Program needs to receive a review within the first four weeks of operation, and a second review within the school year. The review form may be found on our website at <http://dpi.wi.gov/school-nutrition/after-school>. This had been completed 2-21-17, but will need to be done again before the end of the school year; please include both sites.
- Please add a Standard Operating Procedure (SOP) indicating your practices for the Afterschool Snack Program. This template may be modified <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/afterschool-snack-sop.doc>

6. COMMUNITY ELIGIBILITY PROVISION (CEP)

Commendations

- Paperwork and documentation is kept very organized.

Comments/Technical Assistance/Compliance Reminders

- This School Food Authority (SFA) operates under the Community Eligibility Provision (CEP). They run Direct Certification to establish the identified student percentage (ISP) and claiming percentage. Since they do not accept meal benefit applications, there is no certification process.
- Please be aware that when you use the Alternate Household Application to gather family income for your SFA, the time spent on this process may not be paid by the food service department. A time study would be done and the time spent by a food service worker would need to be paid by a general fund and not charged to food service.
- You want to be sure that you maintain all certification documents supporting your participation in CEP. REMINDER: the current identified student percentage (ISP) and claiming percentages are approved through the 2017-18 school year - your four year cycle. CEP participating schools will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).

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.

