

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. Patrick School

Agency Code: 417782

School(s) Reviewed: St. Patrick School

Review Date(s): 1/9/17-1/11/17

Date of Exit Conference: 1/11/17

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.
 - St. Patrick School works with the parish and community receiving donations to cover unpaid meal balances. Thank you for your efforts in this area!

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Patrick School for the courtesies extended during the on-site review. Staff were available to answer questions and 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- Applications are reviewed, a determination made, and the family notified of their status well within the 10 operating days of the receipt, usually 1-2 operating days at St. Patrick School.
- St. Patrick School makes a strong effort to provide application materials in Spanish and to offer translation services for program communications.

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- 14 eligibility determinations were reviewed, no errors were identified. Great job!

Applications

- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined complete by the Determining Official. For direct certification, the effective eligibility date is the date of the output match file.
- When an application has multiple frequencies of income listed, the incomes must be converted into *annual*, not any other frequency (e.g., monthly or twice per month). In addition, the only time an application can be determined in an annual frequency is when multiple frequencies of income are reported or for special situations as outlined in the Eligibility Manual for School meals.
- When a benefit status increases, the change must take place within 3 days. When benefits decrease, the change cannot take place before 10 calendar days and a notice of adverse action must be sent in writing with appeal rights procedures.
- Carryover of the previous years' eligibility status is good for 30 operating days into the current school year or until a new eligibility determination is made.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including email. The determining official should document the details of the conversation, date, and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Verification

- When the application(s) are chosen from the pool for verification, the sample size (likely always 1 for St. Patrick School) is/are the only application the confirming official must review prior to contacting the household for supporting documentation.
- When completing the annual Verification Collection Report (VCR), please refer to the step-by-step instructions available on our website to ensure data is accurately reported:
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-report-instructions.docx>
; <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>

Meal Counting and Claiming

- No errors on the NSLP meal count and edit check process for the review period. Great job!

Findings and Corrective Action Needed

Certification and Benefit Issuance

- Finding #1:** The agency does not maintain a benefit issuance list. This was noted as a corrective action in the previous state audit. USDA states the benefit issuance list must: contain the name and benefit status for all free and reduced-price eligible students in the SFA; be generated from the point of service system used in each of the schools. Point-of-service benefit issuance documents are those documents directly used in the meal count system to deliver the benefits to children (e.g., rosters, master lists); not have duplicate names on the list — each eligible student should only be listed one time.

Example List for manual/combination systems: http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/beniss_ex.pdf

Corrective Action Needed: Submit a benefit issuance list that will be maintained each school year and reflect any changes in status throughout the school year.

Verification

- Finding #1:** The application (1) selected as part of the verification process was not correctly verified by the official. Income was reviewed in net rather than gross. Gross income reported on household income statement should have resulted in a decrease in meal benefits from Free to Reduced.

Corrective Action Needed: Notify the households of the reduction in benefits (to take effect 10 calendar days from the date they are notified in writing. An example adverse action template letter was emailed to the agency. Record the date that corrective action is completed (date letter sent) on the **SFA-2** form and submit to the review consultant along with a copy of the actual household letter sent.

- Finding #2:** The Verification Collection Report (VCR) was not completed correctly in the 2015-16 SY and as submitted prior to onsite review for the 2016-17 SY. Section 5-8, results of verification has been left blank.

Corrective Action Needed: Update section 5-8 for the current school years' VCR. This section must be completed each year. **Corrective action completed onsite. No further action required.**

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Comments/Technical Assistance/Compliance Reminders

The current practice for meal service at St. Patrick School is to serve K-3 students smaller portion sizes than the 4-8 students when the entrée is conducive to altering the serving size, such as hot dishes. This practice is reflective of the outdated Traditional Meal Pattern. Since 2012, the Healthy, Hunger-Free Kids Act outlined acceptable grade grouping as K-5, 6-8, *or* K-8 if you wish to serve all students in your grade school the same portion size. This makes it much easier for the menu planner and for all the volunteer servers that assist with the lunch program. Keep in mind, the Offer Versus Serve policy is in place to minimize food waste if a concern is younger students being provided too much food for them to consume at lunch.

As a reminder, for all students in your school it is required that they are offered one serving of grain and one serving of meat/meat alternate daily. Over the course of the week, your students need to be offered 8 1-oz servings of grain and 8-9 1-ounce servings of meat/meat alternate. On the December monthly menu, it appears there was no creditable grain served on December 21; the menu states that Ham, Whipped Potato, Green Beans, Mandarins, Fresh Salad, Rice Krispie Treat, and Milk were served. Without having the label for the croutons on the salad bar to determine if they are whole-grain rich, it is currently unclear if this day represents a grain shortage or a missing component.

Extra, non-creditable items such as pudding, rice krispie treats, and non-WGR pumpkin bars are featured on the monthly menu. These foods do not credit toward the meal pattern but must be included in the dietary specifications (calories, saturated fat, and sodium). While occasional use of such foods is allowable and can be a nice incentive for participation, they are counting toward your calorie, saturated fat, and sodium limits, without being able to fulfill any of the required components. It can be very difficult to stay within the dietary specification limits. These foods are also adding to the cost of the meal without providing the value of being a creditable component for a reimbursable meal.

Findings and Corrective Action Needed

- ❑ **Finding #1:** Acceptable crediting documentation was not available for (1) Chicken Patty, or (2) Pizza Dippers. These processed foods must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. Please provide crediting information for this product by securing a PFS directly from the manufacturer. If proper documentation cannot be obtained, you should discontinue using these products for school meals. More information about crediting documentation can be found at:
<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>

Corrective Action Needed: Please send crediting documentation for the Chicken Patty, Pizza Dippers that were served during the week of December 12-16, 2016 to the Public Health Nutritionist.

- ❑ **Finding #2:** Acceptable crediting documentation in the form of nutrition fact labels was not available to the Public Health Nutritionist prior to the on-site review. It is strongly recommended to maintain and organize this information in a manner that is easy to reference and update, such as a binder or file folders divided into categories.

Corrective Action Needed: Please send labels that indicate the weight and portion size of the grain items along with an ingredient list to the Public Health Nutritionist for the following items: (1) 2 oz bun served with Chicken Patty, (2) Biscuit served on 12/15, (3) Bread that is used to make garlic toast, and the (4) Shells served on 12/16.

- ❑ **Finding #3:** The “Seasoned Rice” recipe included in the week of review call for white rice, which is not whole grain-rich and therefore does not meet the meal pattern for the grains component. Per conversations for the Food Service Manager, the ingredient actually used during preparation is USDA Foods Brown Rice. Additionally, the stated scoop size is a #16 scoop (1/4 cup) for K-3rd graders and #10 scoop (3/8 cup) for 4-8th graders. In order to credit as 1.0 oz equivalent of grain and therefore meet the daily minimum requirement for grains, the scoops size needs up be updated to #8 scoop (1/2 cup) for all grade levels when rice or noodles are the only grains on the menu that day.

Corrective Action Needed: Please update the Seasoned Rice recipe and send to the Public Health Nutritionist with ingredients and procedures that reflect the actual preparation in your food service

operation. As you come across recipes throughout the school year that have outdated ingredients or do not follow exactly how you prepare the menu item in your facility, please update as needed.

- ❑ **Finding #4:** The “Tator Tot Hotdish” recipe included in the week of review calls for “Ground beef, ground turkey or ground pork” with a handwritten note of “or 10# beef crumbles”. Standardized recipe needs to be precise and clear in their instructions and cannot rely on staff members making the menu item from memory. Ingredients listed in standardized recipes need to be specific, such as 90/10 ground beef or 85/15 ground turkey. They also need to list an exact weight measurement instead of a range, such as the 18-19# currently indicated on the recipe. Additionally, this recipe states the yield is 150 servings. Based on the week of production records provided, the average student total is around 100. This indicates unnecessary leftovers, inaccurate yield information, or heaping scoop sizes are being used in the operation.

Corrective Action Needed: Please update the Tator Tot Hotdish recipe and send to the Public Health Nutritionist with ingredients and procedures that reflect the actual preparation in your food service operation. As you come across recipes throughout the school year that have outdated ingredients or do not follow exactly how you prepare the menu item in your facility, please update as needed.

- ❑ **Finding #5:** A canned mild cheddar cheese sauce used to prepare meals for the NSLP program contains 2 grams of trans fat per serving.

Corrective Action Needed: Discontinue use of this particular product after supplies are exhausted. Find an alternative product with a nutrition label or manufacturer specifications indicating zero grams of trans fat per serving. Submit a copy of the compliant label.

Once the Public Health Nutritionist has all crediting documentation for the week of review, it can be analyzed to determine if the meal pattern for the National School Lunch Program is being met. Until that time, the review cannot be closed. Please be aware that the possibility to a weighted nutrient analysis exists if substantial errors are found. Thank you.

3. RESOURCE MANAGEMENT

Comments/Technical Assistance/Compliance Reminders

Nonprofit School Food Service Account

Annual Financial Report:

- All revenues including state/federal reimbursements, student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong from July 1 to June 30. 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>.
 - St. Patrick School will need to separate out adult meals and extra cold milks from the NSLP program as nonprogram foods starting in the 2016-17 SY report. Allocate a portion of labor expense as well.
- The ending balance on June 30 from the previous year must to be the beginning balance on July 1 for the current year.
- Student payments should not be included in the overall revenue until that meal or milk is sold.
- Report state and federal revenues as gross receipts with commodity shipping and handling charges as a food cost expense under NSLP.

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>.

Paid Lunch Equity

- The Paid Lunch Equity tool must be completed annually and prices raised according to the results of the tool.

Revenue from Nonprogram Foods

- **Nonprogram Foods Revenue Rule SP-20-2016**
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
 - Nonprogram Foods in a nutshell <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
 - All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit. St. Patrick School is adequately charging to cover the full cost of extra milk and adult meals.
 - Nonprogram Food costs and revenues must be separated from Program Food costs and revenues.
 - St. Patrick School sells only nonprogram milk and adult meals and at this time and is exempt from completing the *USDA Nonprogram Food Revenue tool* <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>.
 - Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) should be used to determine 2017-18 SY prices because rates are not released until July 1 of each year.

Indirect Costs

- DPI does not allow the annual assigned indirect cost rate to be applied to the foodservice account. Any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on an indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.

- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the agencies total costs, based on volume.
 - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from agencies total.

Findings and Corrective Action Needed:

Comprehensive Review-Maintenance of the Nonprofit School Food Service Account

- Finding #1:** Rent is charged to the foodservice account without documentation to support the direct expense. Per discussion with SFA, \$400/month for 10 months/year was historically determined to include garbage collection, heat, electricity, copier/paper usage as a way to repay the parish after the construction of the new foodservice kitchen.

Corrective Action Needed: Discontinue charging rent to foodservice or seek *annual* consultation with a local realty broker who has knowledge of current rates for rent of similar food service facilities. Submit a statement explaining how the agency will proceed. If the agency decides to consult a realtor, submit the results of their assessment as part of corrective action. Depending on the outcome, USDA regulations require the food service account to be reimbursed for the 2015-16 SY and the current SY.

- Finding #2:** The 2015-16 SY Food Service Annual Financial Report is not accurate.

Corrective Action Needed: Update the annual financial report to include June 2016 data, correct the beginning fund balance, correctly allocate funds to the ala carte column, and leave out student account balances for meals not yet sold. Submit the updated Annual Financial Report via email to the consultant. This will be forwarded along to the team accountant and updated in the FNS system.

Comprehensive Review- Paid Lunch Equity

- Finding #1:** The Paid Lunch Equity tool was not completed to assess annual paid lunch prices as required. The tool was completed with the assistance of the review consultant during the offsite portion of the AR.

Corrective Action Needed: **The tool was uploaded to the 2016-17 SY online contract during the onsite review. No further action necessary.** The 2017-18 SY tool should be posted to our website soon and be used to asses paid lunch rates before for contract approval in May.

4. GENERAL PROGRAM COMPLIANCE

Commendations

- The agency recently updated their Local Wellness Policy (LWP) covering most of the required components of the final rule. Standout areas include, but are not limited to providing a full 20 minutes for students to eat, incorporating nutrition education lessons in the classroom, a clearly outlined administrative leadership of the policy, and encouraging healthy snacks when brought from home.
- Collaboration between the households and internal foodservice staff/administration to accommodate Special Dietary Needs. Thank you!

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

Nondiscrimination Statement

- When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider,**” so that it can be printed in the same size font as the other printing in the document.

Civil Rights Training

- Civil rights training had been attended by all frontline staff in the school and documentation was available for review.
 - We strongly encourage use of DPIs Civil Rights PowerPoint presentation as a mechanism to train staff in all required areas. The presentation can be located here: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>

Special Dietary Needs

- All food substitutions for children with disabilities must be documented by a licensed medical practitioner statement. We have a prototype Medical Form posted on our website that is also available in Spanish and Hmong: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>. If the form is completed and signed by an appropriate medical practitioner, this indicates that the special dietary request is based on a disability and the school is *required* to provide a meal that meets the child’s needs as documented. The meal would not have to meet the meal pattern requirements and may still be claimed for reimbursement, as the diet requests serves as the meal pattern for that particular child.
- School foodservice staff may make food substitutions, at their discretion, for individual children who do not have a disability. Such determinations are only made on a case-by-case basis and all accommodations must be made according to the USDA’s meal pattern requirements in order to claim.

Processes for complaints

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the agency must be forwarded to the Civil Rights Division of USDA Food and Nutrition

Service within 3 days. You will want to make sure that this is included in the agency procedures to ensure compliance.

- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. The 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

Local Wellness Policy

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

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

Content missing from the current policy for update by June 30, 2017:

- Specific goals for nutrition *promotion*. 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, specifically addressing Smart Snacks in School nutrition standards.
- 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.

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

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Smart Snacks in Schools

- The agency does not have food sales on the school campus, during the school day beyond extra milk during lunch service. For more information on this regulation see our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Training obtained since April 1, 2015 may count towards training requirements. 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

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, one in the fall of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site’s Food Safety Plan. At a minimum, the inspections must be 30 days apart.

- Food safety inspection reports need to be posted in public view.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing staff at work that they are knowledgeable about foodservice practices and uses good food handling practices. Food processes 1-2-3 and Standard Operating Procedures (SOP) noted on the production records.
- All food service employees must have a signed Employee Reporting Agreement on file.

Storage

- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. Ensure storage racks are at least 6” off of the ground.

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in 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.

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.

Reporting and Recordkeeping

- Reference the at-a-glance calendar of School Nutrition Program requirements to keep track of deadlines for annual reporting: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf>

SBP and SFSP Outreach

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at St. Patrick School, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](#) on the [DPI Summer Meals website](#)
 - Promotion of calling 211 to locate meals in the area

- Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
- Promotion of the USDA Summer Food website
<http://www.fns.usda.gov/summerfoodrocks>.
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

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

Civil Rights

- Finding #1:** The full *USDA* nondiscrimination statement was not included with approval/denial letters sent to households. The shortened statement is missing from the menu calendar report sent to households.

Corrective Action Needed: Update the approval/denial letters used to include the full statement. Update the menu calendar report. Submit these updated forms to the consultant. Any other communications to households regarding the meal programs (e.g., website, low balance letters) should also be updated SFA-wide.

- Finding #2:** The 2015-16 SY Public Release form was used for the 2016-17 SY. The Public release was not sent to a grassroots organization and if applicable a local employer contemplating layoffs.

Corrective Action Needed: By signing this report, you agree to use the most updated Public Release each school year and send the public release to additional outlets outside of the media (e.g., food pantry, WIC clinic, Library, etc.).

Professional Standards

- Finding:** the agency does not have a designated “director” per Professional Standards regulations. Annual trainings are not being tracked for all staff involved in the school meal program operation.

Corrective Action Needed: Submit a tracking tool (example in link above) with a plan for staff to meet annual training hours required by their position (part-time/other staff). Civil Rights training does count towards the required hours. Other trainings should be in job specific areas. As discussed onsite, the Authorized Representative fits the description of director and the hiring/training requirements.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program

Findings and Corrective Action Needed

❑ **Finding:** The 2015-16 SY and 2014-15 SY annual claim submitted to DPI were not consolidated with actual point of service counts served to free/reduced students eligible in those years. Consolidated F/R eligible milks claimed were mistakenly copied over from a 2013-14 SY spreadsheet.

Corrective Action Needed: Correct the 2015-16 SY claim with actual Free/Reduced eligibles and per carton cost of \$0.22 prior to state payment. Payment for this program is anticipated within the coming weeks. Please submit this adjustment via email to the program accountant as soon as possible jacque.jordee@dpi.wi.gov and copy the consultant. DPI will calculate a % error rate between the closed 2015-16 SY claim and the corrected claim. This % error rate will be used to reclaim a portion of funds from the 2014-15 SY.

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.

