

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

School Food Authority: St. Paul Lutheran School

Agency Code: 49-7803

School(s) Reviewed: St. Paul Lutheran School

Review Date(s): 1/8/19 – 1/9/19

Date of Exit Conference: 1/9/19

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.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the Special Programs Coordinator, Kitchen Manager and staff for the courtesies extended to us during the on-site review. Thank you for taking time out of the week to be available to answer questions and provide additional information for the review.

The DPI review team is extremely appreciative of the Special Programs Coordinator and the Kitchen Manager's organizational skills and attention to detail. The School Nutrition Programs are operating smoothly because of their work ethic. Both of them have attended many SNSDC training classes to ensure they are meeting program regulations.

The DPI review team appreciates the eagerness of the Special Programs Coordinator and Kitchen Manager for their willingness to make changes to meet School Nutrition Program regulations. There were hardly any items that needed to be corrected at St Paul's. This is a testament to the work ethic, passion, and dedication to school nutrition by the Special Programs Coordinator and the Kitchen Manager.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

Of the thirty-five eligibility determinations reviewed, there were zero errors identified.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available.
- SFAs must annually distribute the Public Release to three places from the following list:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need) such as libraries, food pantries, WIC clinics, Boys and Girls Clubs, YMCA, etc.
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed. You may ask to have the public released published as a public service announcement.

Direct Certification

- Direct Certification is being run adequately and in a timely manner. Keep up the great work!

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Verification

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

- Verification was completed prior to the end of October and done correctly. Great job!

Meal Counting and Claiming

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

- The November 2018 lunch claim was validated. No errors were found.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the school nutrition professionals and dedicated staff at St. Paul Lutheran School. We thoroughly appreciate your time and cooperation prior to and during the Administrative Review (AR). Great effort is made to deliver consistent, quality meals, in a clean and friendly environment. All of the staff were very accommodating while onsite and were very receptive to feedback on ways to further improve the food program.

Thank you, also, to the Kitchen Manager 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 St. Paul Lutheran!

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](https://dpi.wi.gov/school-nutrition/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](https://dpi.wi.gov/school-nutrition/directory) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>).

Child and Adult Care Food Program (CACFP)

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

The new Meal Pattern Charts for the CACFP meal pattern can be found on [USDA's CACFP](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf) webpage (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf).

Crediting Documentation:

Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. Additionally, check that the PFS is accurate, detailing product composition and crediting information in order to be served in School Meal Programs. One food item, Supreme Pizza Burger (served 11/16/18), did not have an accurate PFS with all of the product composition details needed to confirm the crediting prior to onsite review.

Standardized Recipes

Some quantity recipes are kept on file, but should be standardized to reflect current practices, products, ingredients used in the St. Paul Lutheran child nutrition program. Be specific and include detailed information about the specific ingredients, equipment, and procedures. Make sure that each standardized recipe clearly states how many servings it makes, the serving size(s), recipe yield, and the equipment or utensils used for portioning or serving. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Extra Portions and Grade Grouping

During the review period, the menu was planned for the K-8 grade grouping. However, the older students received larger portions for some items (for example, on 11/13/18, 6-8 grade students + adults were allowed to have up to 6 meatballs while K-5 grade students were limited to 5 meatballs). In order to follow the K-8 meal pattern, all students should receive the same menu and same portion sizes for all items. If you plan to provide larger portions for the 6-8 students, the K-5 and 6-8 meals patterns should be followed and planned servings sizes and number of planned servings should be recorded separately on the production record (either using a two grade group production record or two separate production records).

Production Records

Currently, St. Paul Lutheran serves 4K and K-8 menus but production records with three grade groupings: 4K, K-5, and 6-8 + adults. In order to increase efficiency and reduce redundancy, strongly consider consolidating the the K-5 and 6-8 groups on production records.

Be specific on production records about the identity, brand, recipe number, and description of the items served. For example, instead of listing “hamburger bun,” it would be helpful to list “Sara Lee Hamburger Bun.” This will aid in communication to kitchen staff as well as any substitute workers that may assist in the kitchen.

Update any crediting information listed on these production records to accurately reflect the menu item(s) served. Some items for week of review had inaccurate crediting information. For example, when marinara sauce is served, the planned portion size is listed as $\frac{1}{4}$ cup but the crediting is listed as “ $\frac{1}{2}$ vegetable.” Vegetables and fruits are credited by volume. $\frac{1}{4}$ cup marinara sauce credits as $\frac{1}{4}$ cup Red/Orange vegetable (unless an accurate, up-to-date PFS provides information that changes the crediting volume). Likewise, “1 container” of Indian Summer applesauce credits as $\frac{1}{2}$ cup fruit, not “1 fruit.”

Make sure that milk usage is recorded by type for each meal service and that there is a clear delineation between each meal service (whether it be snack, or lunch - if they are on the same production record, there must be a clear distinction between each meal service). For forecasting and communication purposes, it may be beneficial to record planned and actual milk usage by grade grouping (4K and K-8).

A list of production record requirements (“[Must Haves and Nice to Haves](#)”) and sample production record templates can be found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Dietary Specifications

Currently, various high-sodium and full-fat food items and condiments are served as common food offerings. A few examples include full-sodium soups and baked beans and full-fat salad dressings. 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 very difficult to stay within the dietary specification limits if these “extras” are consistently offered on a routine basis. Additionally, frequent use of high-sodium, full-sodium, and/or full-fat foods is strongly discouraged and does not align with the intention of Child Nutrition Programs to help students develop healthy eating habits. Sodium-free spices, spice blends, and reduced-fat or reduced-sodium condiments are great alternatives.

Printed Menu

The printed menu should list all components included with the reimbursable meal. Currently, milk is listed on the menu, but not the varieties available. Consider adding the milk varieties to the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal.

Smart Snacks

At the time of the on-site review there were no competitive foods or beverages sold at St. Paul Lutheran School. 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>).

School Breakfast Program

Consider participating in the School Breakfast Program (SBP). Participation in SBP will enable St. Paul Lutheran to help students start their school day with good nutrition and provide reimbursement to you for doing so. More information is available on the [School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program) webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>). For additional assistance and questions regarding starting a breakfast program, contact DPI’s School Breakfast Team: DPISBP@dpi.wi.gov.

Point of Service

Currently, Point of Service (POS) is at the beginning of the lunch line. Line workers ensure that students do not leave the lunch line without a reimbursable meal. No non-reimbursable meals were observed and line staff have a firm understanding of OVS. However, as the lunch program continues to grow, it may be beneficial to move the POS to the end of the service line where POS staff can be the final check-point that a reimbursable meal is served, helping to expedite the serving process.

MEAL PATTERN AND NUTRITIONAL QUALITY FINDINGS AND CORRECTIVE ACTION NEEDED

Once the Public Health Nutritionist has all crediting documentation, information, and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

Finding #1: Unacceptable or Missing Crediting Documentation. Acceptable crediting documentation was not available for the Supreme Pizza Burgers. Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs 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 by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the Supreme Pizza Burgers.

You should discontinue use of any products for which proper crediting documentation cannot be obtained. More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

Corrective Action Needed: No further action required, corrected on-site.

Finding #2: Insufficient portion information. Meat|Meat Alternate and Grain components are credited by weight, measured in ounce equivalents. One menu item from the week of review, “Cheese Fries, 1 slice” (served on 11/14/18) was portioned, served, and recorded using volume measures, providing insufficient information to credit this product towards the National School Lunch Program. The crediting information on the PFS is listed only by weight.

Corrective Action Needed: No further action required, corrected on-site.

Finding #3: Inaccurate Standardized Recipes. The coleslaw (served 11/12/18) is made using an altered USDA quantity recipe. This recipe needs to be standardized to the St. Paul Lutheran foodservice operation and should include all yield information necessary to credit this menu item towards the NSLP.

Corrective Action Needed: Submit an updated, standardized recipe for coleslaw.

Finding #4: Extra Portions and Grade Grouping. On some days, K-5 students and 6-8 students are given differing portion sizes. All students should receive the same portion sizes for all items if St. Paul Lutheran continues to use the K-8 meal pattern. If you plan to provide larger portions for the 6-8 students, the K-5 and 6-8 meals patterns should be followed.

Corrective Action Needed: Submit a written statement detailing how St. Paul Lutheran will structure meal service moving forward. Please include details such as the meal pattern(s) that will be followed and the grade groupings to be served.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

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

- New for the 18-19 SY, the SFA is now self-op. Prior to this year, they were in a joint agreement with Pacelli Catholic Schools and operating in the red. Now being self-op, they are working on increasing their revenue to operate in the black.

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- These [categories of the AFR](#) that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “nonprogram foods”, report the revenues and expenses for any food items served to students that are not claimed as part of the reimbursable meal such as extra milk, cold lunch milk, extra entrees, extra sides. Adult meals would also be reported under nonprogram foods.

Allowable Costs

- Any nonprogram foods (adult meals, extra entrees, extra sides, carton of milk) may not be given away for free. They must be charged an amount that covers all costs (food, labor, etc.).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Per question 15 of the [Financial Q&A](#), student lunch account debt accrued during the current school year is not allowed to be abated, with the debt being absorbed by Fund 50. Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50 from the general fund.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](#) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Refunds

- When the funds in student lunch accounts are left “unclaimed” after the student has left the school (graduated or withdrawn), they must be returned to the household. Even if the student only has 5 cents left in the account, the student must be refunded. If the funds are left unclaimed, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those

funds to the school food service account. All funds left in any student meal account of a household which cannot be contacted, must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Student Lunch Prices

- St. Paul Lutheran School is charging \$2.90 to students in grades K-5 for a reimbursable lunch. Students in grades 6-8 are charged \$3.25. If the school is following one meal pattern (K-8), then all students should be charged the same price. If the school is following two meal patterns (K-5 and 6-8), then it would be reasonable to have two different lunch prices.

Revenue from Nonprogram Foods

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

- Nonprogram foods include: Adult Meals, Extra Entrees (on occasion), and Extra Milk (for cold lunch or milk break).
- Use the [Menu Raw Food Costing Tool](#) to calculate the raw food cost for extra entrees, adult meals, extra sides, salad bar only, and any other nonprogram foods you may sell. Plug the average raw food cost for these items into the [DPI Nonprogram Food Price Calculator Tool](#) to see what you should sell the items for to ensure you are covering all costs incurred.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (<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) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Findings and Corrective Action Needed: Nonprogram Foods

- ❑ **Finding:** Nonprogram Food Revenue Tool has not been calculated. Looking at the 17-18 SY Annual Financial Report, it is unclear if Nonprogram Food costs are being covered.

Corrective Action Required: Use the Menu Raw Food Costing Tool and the DPI Nonprogram Food Price Calculator Tool to determine if the current nonprogram food prices are adequate. **Submit a statement to the Consultant of the results and what you plan to sell the extra entrées, extra sides, and salad bar (adults only) for.**

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

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. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Local Wellness Policy

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

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food

Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance 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 the SFA complies with the policy.

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the *Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit*. This can be accessed electronically at <http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit> . At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Resources:

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

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding:** The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](#). **Provide a statement of when you plan to have the policy updated and compliant with the final rule.** The [Wellness Policy Builder](#) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy.

Food Safety

- There were no issues reported on-site. The SFA is following their Food Safety Manual which has all of the required information.
- A sharing table flow chart was left and discussed on-site. The SFA currently does not have a sharing table.

Professional Standards

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

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

Professional Standards: New Food Service Director Hiring Requirements

- The [hiring standards for SFA directors](#) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, 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, substitute, volunteer, etc.), professional standards position (director, manager or staff).

Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action Needed: Professional Standards

- ❑ **Finding:** The tracking tool the SFA is using does not have all of the required information on it.

Corrective Action Required: Begin using the [DPI Professional Standards Tracking Tool](#) and send a copy of the completed tool to the Consultant.

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 be 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 onsite:
 - General Mills Mini Bagels
 - Heinz Yellow Mustard
 - Members' Mark herbs and spices
 - Dresher Brand Green Beans
 - Bush's Baked Beans
 - Dei Fratelli tomato products
 - Unipro frozen vegetables

- Masters Gallery Select shredded cheddar cheese

Findings and Corrective Action: Buy American

- **Finding:** Buy American non-compliant foods.

The following product was identified in the SFA's storage area as non-domestic and not documented:

- Garlic powder (China)

Corrective Action: No further action required, fixed onsite.

Reporting and Recordkeeping

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All documents and records pertaining to the School Nutrition Programs must be kept on file for three years plus the current school year. Anything from the 14-15 SY and prior may be shredded.

Summer Food Service Program (SFSP) Outreach

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

- The SFA notifies families of the Summer Food Service Program and information to find open sites during the summer.

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program

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

- The 3K milk break is operating the Special Milk Program perfectly. The teachers have gallons of milk they keep in the classroom refrigerator. They are only counting the number of 8oz increments of milk they are serving. Point of sale is done after the students receive the milk. They are only getting white milk.
- The SFA is operating the Special Milk Program correctly. All students are receiving milk free of charge and are being claimed in the paid category.
- The November 2018 claim for reimbursement was submitted correctly as well.

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 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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).



With School Nutrition Programs!