

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

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**School Food Authority:** St. Aloysius Grade School

**Agency Code:** 567350

**Review Date(s):** November 28-29, 2018

**School(s) Reviewed:** St. Aloysius Grade School

**Date of Exit Conference:** November 29, 2018

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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, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage ([dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training)).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Aloysius Grade School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for 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.

The DPI review team appreciates the eagerness of the staff at St. Aloysius Grade School for their willingness to make changes to meet school nutrition program regulations. Staff generously put their efforts toward the improvement of the health of their students. Staff genuinely want what is best for their students and are working to reduce food waste. They are also dedicated to maintaining students' positive attitudes toward health foods.

The DPI review team is confident that St. Aloysius Grade School will continue to improve their knowledge and operation of child nutrition programs.

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## REVIEW AREAS

Potential future program operations:

- The SFA may benefit from having a [Joint Agreement](https://dpi.wi.gov/school-nutrition/procurement/joint) with a neighboring school district (<https://dpi.wi.gov/school-nutrition/procurement/joint>). A Joint Agreement is established when a school (purchasing school) contracts with another school (selling school) solely for the purpose of providing meals. For more information on Joint Agreements, please contact Alex Zitske at [alex.zitske@dpi.wi.gov](mailto:alex.zitske@dpi.wi.gov) or (608) 267-9288.
- Another option for the SFA is to have an **alternate agreement** with a neighboring school district. The SFA would no longer be its own site; instead, it would be considered a serving site within the neighboring school district.
- Small Victories trainings are designed for creating success with smaller schools in mind. For more information, please visit the [Training webpage](https://dpi.wi.gov/school-nutrition/training) or contact Loriann Knapton ([loriann.knapton@dpi.wi.gov](mailto:loriann.knapton@dpi.wi.gov) or (608) 266-1046) (<https://dpi.wi.gov/school-nutrition/training>).

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## 1. MEAL ACCESS AND REIMBURSEMENT

### Certification and Benefit Issuance

#### Commendations:

Thank you for completing all of the requirements for certification and benefit issuance (BI). These include the public release, appropriate notification of benefits letters, the sharing information form sent to households, as well as the application packet sent to households with all required components. Also, Direct Certification (DC) was run within the appropriate timeframes.

#### Technical Assistance:

- Please make notes on the BI list if extension are made to other members of the household based on a DC run or approved application.

#### Compliance Reminders:

- All SFAs are required to distribute a Public Release before the start of the school year. The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need)
  - 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.
- The Income Eligibility Guidelines (IEGs) cannot be sent home to households. As applications are taken at face value, any distrust is to be avoided between the SFA and households.
- DC is to be run at a minimum of three times per school year: at or prior to the beginning of the school year, three months after the initial run, and six months after the initial run.

Findings and Corrective Action Needed: Certification and Benefit Issuance

**❑ Finding #1:** The free eligibility of a student was reported as of 10/22/18, whereas, his or her eligibility for free meals was not until 11/5/2018. **Fiscal action will be calculated.**

**Corrective Action Needed:** Submit a statement explaining how this will be prevented in the future. Also, submit a revised BI list with the appropriate date change to the consultant assigned to your review.

**Verification**

**Commendations:**

Staff did a great job approving applications and completing the verification process in the correct timeframes. The proper officials completed their assigned portion of the verification process. The Verification Collection Report was also completed prior to the February 1 deadline. Fabulous work!

**Compliance Reminders:**

- As a reminder, gross income must be reported on applications and for verification instead of net incomes.
- If benefits increased for students after as a result of verification, the SFA must change the benefit on the BI list within 3 calendar days. If benefits decreased for students after as a result of verification, the SFA must change the benefit on the BI list within 10 calendar days.

**Resources:**

- Consider utilizing the [Verification Tracker Form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) to keep track of the verification process each school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).

## Meal Counting and Claiming

### **Commendations:**

The counting procedures during lunch service are completed correctly. Recorded counts and point of service are accurate. Great work!

### **Technical Assistance:**

- U. S. Department of Agriculture (USDA) regulations require SFAs to complete edit checks for each of its schools participating in the National School Lunch Program **prior** to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made. Edit checks must be completed monthly.

#### Findings and Corrective Action Needed: Meal Counting and Claiming

**Finding #2:** The edit checks have not been completed.

**Corrective Action Needed:** Submit a statement explaining how edit checks will be completed going forward.

### **Resources:**

- [Edit Check form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming)
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## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **MEAL PATTERN AND NUTRITIONAL QUALITY**

#### **Commendations**

Thank you to the school nutrition professionals and dedicated volunteers at St. Aloysius Grade School. We thoroughly appreciate your time and cooperation during the Administrative Review (AR). Great efforts are made to provide students with menu items cooked from scratch. All of the staff were very welcoming and helpful while we were on-site.

Thank you, also, to the Principal 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. Aloysius!

#### **Comments/Technical Assistance/Compliance Reminders**

*Because schools agree to comply with the regulations set forth by United States Department of Agriculture (USDA) when they choose to participate in the USDA School Meals Programs, willful noncompliance of regulations can result in the loss of federal funding.*

## **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). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts).

## **Crediting Documentation: Storing and Maintaining Updated Crediting Documentation**

- Food used in the Child Nutrition Programs must have proper crediting documentation available. Sources of this information are the USDA Food Buying Guide (FBG), Child Nutrition (CN) labels, and product formulation statements (PFS). CN labels and PFS are required for processed products that are not listed in the FBG, such as Mini Corn Dogs or Chicken Stix. 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. The School Nutrition Team (SNT) at DPI recommends maintaining and organizing this information in a manner that is easy to reference and updated, such as a binder or file folders divided into categories.
- It is common practice at St. Aloysius Grade School to alter processed products to suit the individual tastes of their student population and the quantity needs of the food service program (e.g. adding ground beef, peppers and onions, or taco mixes to CN labeled Taco Meat or adding cheese sauce and noodles to CN labeled Macaroni and Cheese). Any alterations to a CN labeled product or a product with a PFS, either by changing the weight or volume of the product, will change the crediting provided on the CN label or PFS. The product will no longer credit the same towards the meal pattern in the same amounts as the original form.
- More information about crediting documentation can be found on the [Meal Pattern Components](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern).

## **Crediting Grains**

- Grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) of the FBG (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf).
- If a product is not on Exhibit A, obtain a PFS from the manufacturer that lists the grams of creditable grain in the product.
- Additionally, a standardized recipe may also be used to credit grain products. More information can be found on the [Grain Resource](https://foodbuyingguide.fns.usda.gov/FoodComponents/ResourceGrains) page of the FBG under the "Worksheet for Calculating Grains Contribution Using Grams of Creditable Grains" (https://foodbuyingguide.fns.usda.gov/FoodComponents/ResourceGrains).

## **Crediting Items Using the USDA Food Buying Guide and In-house Yield Study**

- At times, it may be necessary to calculate the crediting for certain fruits and vegetables that do not evenly fill an appropriate portioning utensil, such as grapes or baby carrots. The USDA FBG contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods) and should be used to credit foods that do not fill well into portioning

utensils. For example, the weight of ¼ cup of carrots can be determined from the FBG. Simply weigh this amount on a scale and determine the number of carrots. Use this as a reference for ¼ cup.

- Grapes were served during the onsite review, but were neither measured nor counted when placed in individual serving cups. When measuring grapes, an individual plastic cup may or may not credit as ¼ cup fruit, depending on the size and quantity of the fruit used. The FBG tells us that 1 pound (16 oz) of grapes, without stems, provides 11.66- ¼ cups of fruit. If we divide 11.66 by 4, this gives us the total number of cups, so 1 pound (or 16 oz. by weight) equals 2.915 cups. From this, the weight of a portion can be determined. For this example, ¼ cup will be used as the portion.

<p><i>What we know:</i> In 16 oz. of grapes, there are 2.915 cups of edible grapes</p>	$\frac{16 \text{ oz. grapes (by weight)}}{2.915 \text{ cups edible grapes}} = \frac{X \text{ oz. grapes (by weight)}}{0.25 \text{ cups edible grapes}}$	<p><i>What we need:</i> How many oz. of grapes it takes to make one ¼ cup serving</p>
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Cross multiply 16 oz x 0.25 cup = 4, then divide by 2.915 cups = 1.37 oz. This means that ¼ cup of grapes weighs 1.37 oz. Based on this information, weigh grapes to determine how many equal 1.37 oz. Use this number as a reference for ¼ cup, or determine the best portion utensil that fits 1.37 oz.

- Additionally, if products received are a significantly different size than usual and are not found in the FBG, conduct an in-house yield study. An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG. In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the next AR.
- TA given onsite regarding crediting grapes when unable to use the FBG: the grapes served on day of onsite review were not portioned prior to being placed in individual plastic service cups. As such, it was not possible to determine how these credit toward the NSLP. Foodservice staff performed an in-house yield to verify that 1 plastic cup held ¼ cup fruit.
- Use the following resources for more information:
  - [USDA's Food Buying Guide](https://foodbuyingguide.fns.usda.gov/) (https://foodbuyingguide.fns.usda.gov/).
  - Specific and verifiable In-house Yield [procedures](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf), are available on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy)

### Standardized Recipes

- Recipes should be standardized in each kitchen to reflect the products and practices that are used in that kitchen, especially if substitutions are made. Standardized recipes are required for all menu items that have more than one ingredient, unless both ingredients are listed on the production record separately and served separately on the service line (e.g., chicken patty and bun). Standardized recipes produce consistent quality and yield every time, which is crucial for crediting recipes and menu planning to meet the daily and weekly meal pattern requirements. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your food service operation.

- While some recipes were available at St. Aloysius Grade School, these recipes were not standardized to the food service operation and are frequently not followed. During onsite observation, recipes were altered and substitutions were made on a daily basis. The bread made day-of observation did not follow the recipe provided in review documentation, and substitutions were noted to the recipe that was in use. Recipes must be followed exactly to ensure proper crediting, calories, etc.
- For steps on how to standardize a recipe: [Recipe Standardization Steps](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/recipe-standardization-steps.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/recipe-standardization-steps.pdf)

### **Portioning**

- Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e., the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches children good eating habits by demonstrating and providing appropriate portion sizes of each food group at a meal. Proper portion control ensures a reimbursable meal is served, so students receive the planned quantity of the food component (e.g., two ounce equivalents of grain) or nutrients. Food costs are controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase. Note, portion sizes that are too large can sometimes discourage younger children from eating.
- Portion sizes must be full, level scoops in standardized measuring utensils. Utilize appropriate portion tools, such as spoodles or measuring cups, when preparing and serving food. If a kitchen tool does not measure, such as a slotted spoon or spatula, it is not an appropriate portioning tool and should not be used when portioning components or menu items.
- The kitchen at St. Aloysius Grade School uses serving utensils that are not appropriate, standardized measurement tools. These include slotted spoons, gravy ladles, casual silverware (intended for household use), and large industrial spoons. It is strongly recommended to discontinue use of these tools and replace them with standardized measuring tools, such as foodservice spoodles or scoops. This will allow staff to measure and portion foods appropriately for Child Nutrition Programs.

### **Menu planning and Meal Pattern Compliance: Meeting daily and weekly meal pattern requirements.**

- The USDA lunch meal pattern establishes daily and weekly requirements for each component by age/grade group. For example, K-5 students must be offered  $\frac{3}{4}$  cup vegetable daily. Students must be offered a variety of vegetable subgroups each week such as Dark Green, Red/Orange, Beans and Peas (Legumes), Starchy, and Other. Consider using Menu Planning Worksheets to ensure all available NSLP components meet daily and weekly minimum requirements.
- Menu planning worksheets and other useful resources are located on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage, under the Menu Planning Worksheets heading (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools).

### **Production Records:**

- Production records are intended to be useful tools to record information prior to production, during production, and following production. Accurate production records aid the menu planner with forecasting, ordering, future menu planning, and reducing both food waste and food costs.
- Production records should list the foods to be prepared for service prior to meal preparation. They should also be filled in throughout meal preparation and service to reflect real-time



processes, any necessary adjustments, and communicate preparation information to other staff members.

- Continue working with all staff members to record planned usage, actual usage, and leftovers for any food offered as part of a reimbursable meal. While there is no required production record template, there are some examples, including multiple age/grade groups that may be used on our [Production Records webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements (“Must Haves and Nice to Haves” list) can also be found at that link.

#### **Whole Grain-Rich:**

- Foods that meet the whole grain-rich (WGR) criteria contain at least 50 percent whole grain(s). The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. The following grain products found in storage were not WGR: Pasta LaBella lasagna noodles, Food Club egg noodles, and spaghetti noodles. Use USDA’s [Whole Grain Resource](https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) to identify whole grain-rich products (<https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).
- If the SFA continues to use these products in the future, it will be necessary to mix the non-WGR product with a 100% Whole-Grain product at a minimum ratio of 50% whole-grain to 50% non-WGR. Please note that employing this method requires the use of 100% whole-grain to offset the non-WGR products.

#### **Dietary Specifications:**

- **Weight vs. Volume Measurements:** Meat/meat alternate (M/MA) is credited by weight, not by fluid ounces. Spoodles and measuring cups measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fluid ounce spoodle or a one-half cup measuring cup for an intended 4 ounce (by weight) serving of ground/diced/shredded meat/meat alternate. To ensure that students receive adequate amounts of M/MA, weigh the M/MA, then determine which scoop will hold that weight.
- **Full sodium or full-fat foods:** Currently, various high-sodium and full-fat condiments are used in standardized recipes and common food offerings (e.g. cheese sauce, butter, sour cream, and canned soup). While these foods do not credit towards the meal pattern, they must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). It may be difficult to stay within the dietary specification limits if these “extras” are consistently offered. Occasional use of such foods is allowable and can be a nice incentive for participation for menu items with historically low sales; however, frequent use of high-sodium, full-sodium, and full-fat foods is strongly discouraged and does not align with the intention of Child Nutrition Programs to help students develop healthy eating habits. TA was provided onsite to purchase low-sodium or low-fat options.
- **Non-creditable foods:** Extra, non-creditable foods such as chips, dip, cheese sauce, butter, and desserts are frequently offered on the menu. These foods do not credit towards the meal pattern, but must be included in the dietary specifications. Additionally, the frequent addition of dessert-type foods (puddings, crisps, marshmallows, etc.) to fruit does not foster acceptance of other creditable forms of fruit, including fresh, canned, frozen, or dried.
- **Grain-based Desserts:** No more than 2.0 ounce equivalents (oz eq) of grain-based desserts can be offered per week at lunch. Grain-based desserts must be whole grain-rich to count towards the grain component. If a grain-based dessert is not WGR, it cannot count towards the grain component, but will contribute to the dietary specifications. [Exhibit A](#) of the FBG provides more information on the serving limits of grain-based desserts at breakfast and



lunch (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). Any grain item listed on Exhibit A marked with a superscript 3 or 4 will denote a grain-based dessert.

- **Condiment Signage:** Condiments are placed on the serving line among reimbursable meal components and are served frequently without portioning control. Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Please monitor your school's condiment usage and communicate appropriate portion sizes to students. This can be done by individually portioning condiments, utilizing signage in front of the condiments conveying appropriate portion size such as, "One scoop, please," and limiting the amount of condiments served.

#### **Offer Versus Serve (OVS):**

- There is some confusion over the difference between OVS and the planned menu among kitchen staff. The planned menu must be in compliance with all meal pattern requirements, both daily and weekly. Therefore, the printed menu, recipes, portion sizes on production records, etc., should reflect the menu and portion sizes as planned.
- OVS occurs only during meal service and gives the student the ability to accept or decline meal components. At lunch, a student must select at least three full and different food components, one of which is  $\frac{1}{2}$  cup fruit and/or vegetable to make a reimbursable meal.
- The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) and the [Offer Versus Serve Webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) may be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf> and <https://dpi.wi.gov/school-nutrition/training/webcasts>).

#### **School Breakfast Program:**

- St. Aloysius Grade School does not participate in the School Breakfast Program (SBP); however, this may be an option in the coming school year if the SFA participates in a Joint Agreement with another area school as planned. Participation in the program is encouraged, as ensuring students have access to breakfast is beneficial for their health and academic success. Specifically, students who eat breakfast at school, closer to class and test taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. Providing students with breakfast in the classroom is associated with lower tardy rates and fewer disciplinary referrals.
- The [breakfast resources webpage](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>) contains a wealth of information about the different breakfast service and financial models. For questions on breakfast models or starting a program, contact the School Breakfast Program Specialists (DPISBP@dpi.wi.gov).

#### **Signage:**

- Adequate signage helps to ensure that students accurately select reimbursable meals. Signage was available in the meal service area; however, it is recommended to place signage directly on the salad bar to convey appropriate portions to students. This will help students select reimbursable meals and ease the burden of Point of Sale staff when determining whether a meal contains sufficient quantities and components.
- Portion sizes of at least  $\frac{1}{8}$  cup of the fruit and vegetables on the salad bar should be communicated to students with signage. [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) can be found on our [Signage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) webpage, under the heading Additional Signage Resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>; <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

## 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 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 #3: Unacceptable or Missing Crediting Documentation.** Processed foods that are not listed in the FBG must be accompanied by a PFS or CN label to sufficiently document meal component crediting.

**Corrective Action Needed: Finding #3** Please provide crediting documentation information for the following by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the following products:

- Mini Corn Dogs (Served 10/15, Distributor Information Sheet provided, however CN label or PFS needed)
- Chicken Stixx (Served 10/16, CN label or PFS needed)\* **Corrected onsite. No further action required.**
- Hot dog (Served 10/18, CN label or PFS needed) \* **Corrected onsite. No further action required.**

### **Finding #4: Missing or inaccurate Standardized Recipes.**

Recipes are frequently not followed nor are all of the recipes on file. Many of the recipes provided for the week of review were inaccurate.

When asking the school nutrition professional about the recipes and practices in place during the week of review and for the day of onsite review, the school nutrition professional reported not using recipes for any food items other than some baked goods. This includes recipes that were provided as part of the AR documentation. It was further explained that the recipes provided were approximations of current practices compiled solely for the purposes of the upcoming AR and some of these recipes are not actually in use.

Standardized Recipes were unavailable for the following:

- Peanut Butter and Jelly Sandwich (daily alternate)
- Taco Salad (served 10/17) - contains a CN labeled food that is altered and cannot be credited without a standardized recipe; school nutrition professional reports that this recipe varies. Sometimes multiple CN labeled products are combined (USDA pepper/onion mix and Pork Taco Meat) and sometimes the school nutrition professional adds ground beef to the Pork Taco Meat to extend the recipe.
- Hot dog on a bun (served 10/18)
- Macaroni and Cheese (served 10/19) - contains a CN labeled food that is altered and cannot be credited without a standardized recipe; the recipe provide at time of onsite review does not reflect the ingredients listed on production records for week of review.

Standardized Recipes provided for the week of review were incorrect and therefore were either not acceptable for crediting food toward the NSLP or caused foods to credit differently than planned:

- Cran-apple salad (served 10/16) - planned serving of 0.5 cup only provides 0.25 fruit (apple, the quantity of cranberry jelly is not sufficient to credit) based on FBG information, which is recorded as 0.5 cup apple and 0.5 cup cranberry on production records
- Apple crisp (served 10/19) - recipe lists crediting as 0.75 cup apple in 0.5 cup serving, which contains a crumble-type topping; additionally, accurate crediting cannot be determined based on information in the recipe

Standardized Recipes provided for the week of review were found onsite to be inaccurate representations and not reflective of the cooking methods and procedures currently in use:

- Cinnamon Bread (served 10/15/18)\*
- Italian Bread (served 10/16/18)\*
- Honey Wheat Bread (served 10/17/18)\*

\*While onsite, reviewers weighed several slices of baked bread, which averaged 1.3 oz. each. Using Exhibit A, these slices credit as 1.25 oz. eq. grains. Menu certification workbooks will be updated to reflect this measurement. While the inaccurate bread recipes did not cause a grain shortage at this time, recipes need to be standardized to current practices and followed every time food is made.

**Corrective Action Needed: Finding #4** - Submit updated, standardized recipes for the menu items listed above.

**Note:** Technical Assistance on this finding was provided during the School Year 2014-2015 AR. The following was written in that report: *“Standardized recipes are kept on file, but could use some updating. Make sure that each standardized recipe clearly states how many servings it makes.”*

**Finding #5: Insufficient portion information.** M/MA and grain components are credited by weight, measured in oz eq. The Taco Meat, Fritos (corn chips), and Mac-and-Cheese were recorded and served in 0.5 cup portions during week of review (10/17/18; 10/19/18), which is a volume measure. However, crediting documentation must show how this volume credits by providing the weight to volume conversion. Some products offer a weight-to-volume conversion, such as the USDA Pork Taco Meat Filling, which provides acceptable portion information to credit towards the meal pattern (e.g. #10 scoop credits 2.0 oz eq M/MA). However, when an original recipe is altered (as explained in **Finding #4**), the weight-to-volume conversion may no longer be accurate.

The fruit, vegetable, and milk components credit by volume and measure in cups (or fractions of cups). During the week of review, one-quarter of a baked potato (10/15/18) was portioned by serving part of an entire potato rather than measuring the volume of the potato. The FBG may be used to credit some potatoes by weight in addition to volume; however there must be a FBG entry that accurately reflects the potatoes being used. There is no FBG entry that accurately reflects the potatoes used on 10/15/18.

**Corrective Action Needed: Finding #5** Please provide the following:

- The volume measure for ¼ baked potato.
- The weight of 0.5 cups of Fritos.
- To resolve the volume-weight crediting issues with the Taco Salad and Mac-and-Cheese, **please see Finding #4**. An accurate standardized recipes submitted as Corrective Action for Finding #2 will be accepted as part of Corrective Action for Finding #3.

**Finding # 6: Insufficient Daily Fruit Quantities.** K-5 students must be offered 0.5 cups of fruit daily. There were daily fruit shortages during the week of review at lunch on Tuesday and Friday, as outlined below:

- Tuesday: 0.5 cups of Cran-apple salad was served, which only provided 0.25 cups of fruit.
- Friday: 0.5 cups of Apple crisp, which includes a crumble-style topping was served. Crediting cannot be determined based on information provided in the recipe. Less than 0.5 cups of fruit was served considering the crumble topping accounted for part of the 0.5 cup volume of the planned portion size.

**Corrective Action Needed: Finding #6** - Please refer to the corrective action under **Finding #11**

**Repeat violations of a daily fruit shortage during subsequent Administrative Reviews may result in Fiscal Action.**

**Finding #7: Insufficient Weekly Quantity of Fruit** - K-5 students must be offered 2.5 cups of fruit weekly. Because recipes are inaccurate or not used, as explained in **Findings #4 and #6**, there was a weekly fruit shortage. Only 2.0 to 2.25 cups of creditable fruit were served for the week of review, which is outlined below:

- Monday: 0.5 cup pear halves
- Tuesday: 0.25 cup apple
- Wednesday: 0.75 cup mixed fruits
- Thursday: 0.5 cup pear halves
- Friday: 0-0.25 cup applesauce + canned apple slices

**Corrective Action Needed: Finding #7** - Please refer to the corrective action under **Finding #11**.

**Please note that repeat violations of a weekly fruit shortage during subsequent Administrative Reviews may result in Fiscal Action.**

**Finding #8: Insufficient Daily Vegetable Quantities** - K-5 students must be offered 0.75 cups of vegetables, daily. Due to insufficient portion information, as explained in **Finding #5**, inaccurate standardized recipes, as explained in **Finding #4**, and inadequate planned portions, there were daily vegetable shortages at lunch on Monday, Tuesday, and Wednesday during the review week, as outlined below:

- Monday: 0.5 cups of green beans and non-creditable amount of baked potato (see **Finding #5**) was served
- Tuesday: 0.5 cups of broccoli was served
- Wednesday: indeterminable and therefore not creditable amounts of peppers/onions\* and Red/Orange\*\* vegetable (as part of the taco meat) were served

\* During onsite review, the SA tried to determine the creditable portions for components in the Taco Salad (served Wednesday, 10/17/18 and day of onsite review) as no standardized recipe was available (see **Finding #4**). The school nutrition professional clarified that the 0.75 cups of peppers/onions listed on production records was an approximation of what they used to season an entire batch of taco meat intended for approximately 40 students. This means that 0.75 cup peppers/onions is not what students were offered. The school nutrition professional did note that students are sometimes offered peppers/onions on top of the Taco Salad. It was not clear what quantity of vegetables students were offered on Wednesday during week of review. This could not be clarified by production records (see **Finding #13**) or in-person discussion.

\*\* The bulk of the taco meat served as part of the taco salad is a CN labeled product that contains a creditable  $\frac{1}{8}$  cup Red/Orange vegetable. Alterations are made to this product in the kitchen and the actual portion served is unknown (see **Findings #4 and #5**). While some amount of a Red/Orange vegetable was served, the creditable amount cannot be determined making this a shortage rather than a missing component.

**Corrective Action Needed: Finding #8** - Please refer to the corrective action under **Finding #11**.

**Repeat violations of a daily vegetable shortage during subsequent Administrative Reviews may result in Fiscal Action.**

**Finding #9: Insufficient Weekly Quantity of Vegetable** - K-5 students must be offered 3.75 cups of vegetables, weekly. Due to the multiple daily vegetable shortages outlined in **Finding #8**, there was a weekly vegetable shortage. Only 3.0 cups of creditable vegetables were served for the week of review, which is outlined below:

- Monday: 0.5 cups of green beans and non-creditable amount of baked potato
- Tuesday: 0.5 cups of broccoli
- Wednesday: 0.5 cups of corn and non-creditable amount of vegetables served (see **Finding #8** for more information)
- Thursday: 0.5 cups of baked beans +and 0.25 cups of carrots
- Friday: 0.75 cups of mixed vegetables (0.25 cup servings of carrots, cauliflower, and peppers)

**Corrective Action Needed: Finding #9** - Please refer to the corrective action under **Finding #11**.

**Repeat violations of a weekly vegetable shortage during subsequent Administrative Reviews may result in Fiscal Action**

**Finding #10: Insufficient Weekly Vegetable Subgroup (Red/Orange)** - K-5 students must be offered 0.75 cups of Red/Orange vegetables weekly. Due to inaccurate standardized recipe and production records (see **Findings #4 and # PR**) only 0.5 cups of Red/Orange vegetables were able to be credited toward the NSLP meal pattern. The quantities of creditable vegetables served for the week of review, are as follows:

- Monday: 0.5 cups of green beans and non-creditable amount of baked potato
- Tuesday: 0.5 cups of broccoli
- Wednesday: 0.5 cups of corn and non-creditable amount of vegetables served (see **Finding #8** for more information)
- Thursday: 0.5 cups of baked beans and 0.25 cups of carrots
- Friday: 0.75 cups of mixed vegetables (0.25 cup servings of carrots, cauliflower, and peppers\*)

\* Peppers used on 10/19/18 were credited as “other vegetable.” Production records do not list the color of the bell pepper and the school nutrition professional was not able to provide the information.

**Corrective Action Needed: Finding #10** - Please refer to the corrective action under **Finding #11**.

**Repeat violations of a weekly vegetable subgroup shortage during subsequent Administrative Reviews may result in Fiscal Action.**

**Note:** Technical Assistance and Corrective Action on this finding was provided during the School Year 2014-2015 AR. The following was written in that report: *“The week of review did not meet the required weekly amount of dark green and red/orange vegetables. ¼ cup of dark green vegetables were offered which is short of the ½ cup requirement, and ½ cup red/orange vegetables were offered which is short the ¾ cup requirement. A vegetable subgroup table was provided as a reminder of which vegetables fall into which subgroups.”*

**Finding #11: Insufficient Daily Meat/Meat Alternate** - K-5 students must be offered 1.0 oz eq. of meat/meat alternate (M/MA) daily. Due to insufficient portion information, as explained in **Finding #5**, and inaccurate standardized recipes, as explained in **Finding #4**, there was a daily M/MA shortage on Friday during the week of review. Crediting could not be determined for the 0.5 cup of Mac-and-Cheese that was served.

Currently, the school nutrition professional mixes 2 additional pounds of macaroni and 2 packets of non-creditable cheese sauce into State Processed Product C720. Without alterations, C720 credits as 2.0 oz. eq. M/MA and 1 oz eq grain per 6 oz (by weight) portion. Adding macaroni and non-creditable cheese sauce product decreases the amount of creditable M/MA available per serving. The total yield for this recipe is unknown, and crediting cannot be determined.

**Corrective Action Needed for Findings #6-11 :** Please submit a menu planning worksheet for K-5 Lunch for the week of review (October 15-19, 2018), showing that all quantities, both daily and weekly, will be met for all components.

- Please fill out a Menu Planning Worksheet for K-5 Lunch for the week of review (October 15-19, 2018): [K-5 Lunch Menu Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-5.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-5.doc)
- Please refer to the [Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) for daily and weekly requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf).

**Repeat violations of a daily M/MA shortage during subsequent Administrative Reviews may result in Fiscal Action.**

**Finding #12: Non Whole Grain-Rich Foods** - Non whole grain-rich (WGR) foods (Fritos corn chips) were served during the week of review and on the day of review with the Taco Salad. Technical Assistance and Corrective Action on this finding were provided during the School Year 2014-2015 AR. The following was written in that report: *“Most of the grain items offered during the week of review and day of observation were not whole grain-rich. Starting this school year, all grains must be whole grain-rich, which means that at least 50% of the grain in the food is whole grain. Foods do not need to be 100% whole grain. A non-whole grain-rich grain (for example, one whose first ingredient is “enriched wheat”) does not count towards the grain requirement of the meal and is counted as an “extra” food, meaning that it only contributes calories to the weekly average. You can identify whole grain-rich products by looking for the word “whole” on the ingredient label; the first ingredient should say “whole wheat” or “whole corn.”*”

**Corrective Action Needed: Finding #12** - Discontinue use of non-whole grain-rich foods. Submit a label and planned portion size for the Fritos replacement product that is whole grain-rich.

**Finding #13: Inaccurate and Incomplete Production Records.** Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. These records are meant to be real-time tools to be utilized by the school nutrition professionals.

During onsite review, a spiral notebook was used instead of production records during meal prep and service. Food usage is recorded in this notebook both after preparation and after service. The information from the spiral notebook and memory is then transcribed onto the SFA's production record template at a later time. The school nutrition professional reported that these production records are sometimes filled out at the end of the school week, but may not be filled in for several weeks at a time. This is problematic, as information may not be accurately recorded when it is recalled by memory after several weeks. Production records are unavailable for meal service to convey critical information (such as planned portion size) to all school nutrition professionals.

The SA verified that production records were on file for the month of review.

Additionally, the production record template currently in use is not being filled out properly and is lacking accurate key components, including:

- Planned/actual number of servings prepared
- Planned/actual quantity prepared in purchase units
- Amount leftover (in servings or purchase units)
- Planned serving size and usage for condiments and any extra menu items

**Corrective Action: Finding #13** - Provide one week of completed lunch production records on an updated production record template. Send production records that you are confident are accurately and completely filled in.

**Finding #14: Offer Versus Serve** - Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. Additionally, a school nutrition professional reported that because the school nutrition professional feels that young students will not want full components and/or the full serving size as planned, the school nutrition professional does not consistently offer the planned quantities. This is consistent with onsite observation where a large spoon (from a household serving set), which was reported as a common serving utensil, would have been used to serve corn, rather than a portion tool adequate to serve the 0.5 cup portion size. While this was corrected onsite prior to service, it is evident in the production records provided for review week that this is a common occurrence. For example, on 10/18 baked beans were served; the serving size was listed as 0.5 cup on production records. Only one #10 can was prepared. The FBG tells us that one #10 can of baked beans will yield about 11-¾ cups heated beans with sauce, which is 23.5 0.5-cup servings. 41 student meals and 2 adult meals were served that day. While the ability to accept or deny components is a basic tenement of OVS, preparing only 23.5 servings means that the school nutrition professional was either planning for approximately 45% of the student population to not take a full component of the baked beans or they planned to serve smaller portions than the planned portion size.

**Corrective Action Needed: Finding #14** - Conduct a staff OVS training and submit a dated sign-in sheet.

## SMART SNACKS

### Comments/Technical Assistance (TA): Smart Snacks



## Fundraisers

- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; SFAs have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements. More information on [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) can be found on our webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- St. Aloysius Grade School uses the exempt fundraiser tracking tool to track upcoming fundraisers, but required information was missing. TA was provided onsite to clarify information on the tracking tool.
- St. Aloysius Grade School plans to sponsor an Easter fundraiser for the Knights of Columbus. While it is strongly encouraged that funds raised directly benefit the school, DPI recognizes the school's desire for community involvement. Fundraisers for non-school organizations will be permitted if they are sponsored by the school.

## BUY AMERICAN

### Comments/Technical Assistance (TA): Buy American

- 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.
- There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:
  1. Date
  2. Name of product
  3. Country of origin
  4. Reason
    - a) Cost analysis
    - b) Seasonality- record the months that the domestic product is not available
    - c) Availability
    - d) Substitution- record the reason the distributor substituted the product e. Distribution- record the reason the distributor carries the non-domestic product
    - e) Other- explain
- You may record additional information if you find it beneficial.
- 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](https://dpi.wi.gov/school-nutrition/procurement/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:
  - Heinz Mustard
  - Musselman's canned apples
  - Michigan Made beans
  - Sysco-brand frozen corn and cut broccoli

### **Findings and Corrective Action: Buy American**

**Buy American Finding #15: No Buy American tracking procedure was in place at time of review.** The following products were identified in the SFA's storage area as non-domestic and not documented:

- Mandarin oranges, from China
- Pineapple, from the Philippines

**Buy American Corrective Action #15:** Complete and submit a Buy American Non-compliant Product List for tracking non-domestic products that includes all necessary information. A sample [Buy American Noncompliant List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx): (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).

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## **3. RESOURCE MANAGEMENT**

### **Non-profit School Food Service Account**

#### **Commendations:**

Staff are very knowledgeable on the requirements for maintaining a non-profit status and maintaining the foodservice account. Revenues and expenditures are accurately reported.

#### **Technical Assistance:**

- Revenues and expenditures of non-program foods (e.g. second meals, extra milks, adult meals, etc.) are to be reported on the Annual Financial Report (AFR). This information is tracked appropriately and accurately and it needs to be transferred to the AFR.
- For the AFR, the ending fund balance of the previous SY must match the beginning fund balance of the current SY. The ending fund balance is as of June 30, and the beginning fund balance is as of July 1.

<p><u>Findings and Corrective Action Needed: Non-profit School Food Service Account</u></p>
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**Finding #16:** Operating funds transfers are made throughout the school year as needed, but are not reported on the AFR.

**Corrective Action Needed:** Create an action plan to prevent this from occurring in the future. Submit this action plan to the consultant assigned to your review.

**Finding #17:** The ending fund balance on the AFR did not match the ending fund balance on the foodservice account balance sheets.

**Corrective Action Needed:** Create an action plan to prevent this from occurring in the future. Specifically, please detail the numbers that should have been reported on the 17-18 AFR. Submit this action plan to the consultant assigned to your review.

**Potential Further Corrective Action (if necessary):** Please re-submit the corrected 17-18 AFR to Jacque Jordee. She may be contacted via email at [jaqueline.jordee@dpi.wi.gov](mailto:jaqueline.jordee@dpi.wi.gov), or by phone at (608) 267-9134.

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### **Paid Lunch Equity (PLE)**

A comprehensive review of the PLE area was completed.

#### **Commendations:**

The PLE tool was completed correctly, although not required, as the SFA completed the PLE exemption survey and reported a positive account balance as of January 31, 2018.

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### **Revenue from Non-program Foods**

As the SFA does not sell non-program foods beyond extra milks and adult meals, the non-program foods revenue tool was not required.

#### **Technical Assistance:**

- All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Non-program food costs and revenues must be separated from program food costs and revenues.

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

#### Commendations:

No overt identification was not observed on-site. The SFA made conscious efforts to provide household letters and application forms to families in the appropriate languages. Great work!

#### Technical Assistance:

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements.
- School food service staff may make food substitutions, at their discretion, to accommodate 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.
- Civil Rights Training is to be completed for all staff working with the programs. Please ensure that all staff involved in the meal programs complete the Civil Rights training **annually** as well as sign-off on the participation form.

#### Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #18:** The non-discrimination statement on the menus is outdated.

**Corrective Action Needed:** Please provide an updated menu to the consultant assigned to your review. The correct, updated non-discrimination statement is as follows:

*This institution is an equal opportunity provider.*

#### Resources:

- Please find the Civil Rights training PowerPoint and Attendance sheet on the [Civil Rights webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

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### Local Wellness Policy (LWP)

#### Commendations:

The SFAs LWP was wonderfully in-depth and detailed. The policy is also revised annually, as required. Great work!

#### Compliance Reminders:

- The required areas of the LWP are as follows:

- Nutrition education
- Nutrition promotion
- Physical activity
- 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.
- 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
- 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.

Findings and Corrective Action Needed: Local Wellness Policy

**Finding #19:** Smart Snacks and Triennial Assessment language was not included in the SFAs LWP.

**Corrective Action Needed:** Please submit a statement explaining how and when this language will be included to the consultant assigned to your review.

**Resources:**

- The Local Wellness Policy checklist and Local Wellness Policy Builder are available on the [LWP webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy).

**Professional Standards**

**Commendations:**

The foodservice director has completed all annual training requirements and they are tracked appropriately. Great work!

**Technical Assistance:**

- Professional Standards training tracking is required for all foodservice employees. Volunteers and other staff working with the programs require job-specific training. For more information, please reference the [Professional Standards Training Requirement sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf).
- Annual training hour requirements are as follows:
  - Food Service Director: 12 hours
  - Food Service Manager: 10 hours
  - Full-time Food Service Staff: 6 hours

- Part-time Food Service Staff: 4 hours

Findings and Corrective Action Needed: Professional Standards

**Finding #20:** Trainings were not completed nor were they tracked for the foodservice manager and staff.

**Corrective Action Needed:** Please submit an action plan to the consultant assigned to you review detailing how the required trainings will be completed and tracked.

**Resources:**

- [Professional Standards “In a Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf)

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**Food Safety and Storage**

**Commendations:**

Thank you for having the most recent food safety inspection report and the “And Justice For All” poster displayed in a publicly visible area of the program serving sites. The Food Safety plan was site-specific and contained all required elements. Findings from the most recent Food Safety Inspection report were noticeably rectified. Food safety was conducted in the kitchen intentionally and for the wellbeing of all students. Wonderful job!

**Technical Assistance:**

- Please be mindful of hand washing before handling food products. This was noted in the most recent food safety inspection, and minor issues were observed on site.

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**Reporting and Recordkeeping**

**Commendations:**

All records are maintained on-file for the required three years plus the current school year. Thank you!

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**Summer Food Service Program (SFSP) Outreach**

**Commendations:**

SFSP outreach has been completed. Thank you!

**Compliance Reminders:**

- Before the end of the academic school year, SFAs are required to send information to households regarding Summer Food Service Programs in their area.
- 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. Aloysius Grade School, USDA requires all SFAs to inform families of where their students can

receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

**Resources:**

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

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## 5. OTHER FEDERAL PROGRAMS REVIEWS

### Special Milk Program (SMP)

**Commendations:**

The teacher and students enjoyed the program and staff are very knowledgeable of program requirements. All records are maintained for the required three years plus the current school year. The SFA operated SMP as non-pricing thus reducing the cost for participating students. Great job!

**Compliance Reminders:**

- Milk for the SMP must be claimed in 8-ounce portion sizes. More than one 8-ounce portion may be claimed per student per day.

**Resources:**

- [SY 2018-19 Reimbursement Rates](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)
- [AIDS Register](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) for reimbursement per program (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

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Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. 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 student success.

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate webpage](https://dpi.wi.gov/statesupt/every-child-graduate) (https://dpi.wi.gov/statesupt/every-child-graduate).





*With School Nutrition Programs!*