

# USDA Child Nutrition Programs Administrative Review Summary Report

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**School Food Authority:** Green Bay Area Catholic Education    **Agency Code:** 59659

**School(s) Reviewed:** St. Thomas More & St. Bernard

**Review Date(s):** 5/8/18-5/10/18

**Date of Exit Conference:** 5/10/18

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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. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and 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).
- The US Department of Agriculture 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Green Bay Area Catholic Education for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Commendations/Comments/Technical Assistance/Compliance Reminders

- Direct Certification was run during the required timeframes and runs were available for review.
- Applications were approved within 10 days of receiving.
- The food service director took detailed notes explaining all of the follow up needed before approving the applications.

#### Limited English Proficiency (LEP)

- All program materials were accessible in English and Spanish. The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (https://www.fns.usda.gov/school-meals/translated-applications).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

#### Findings and Corrective Action Needed: Certification and Benefit Issuance

**Finding # 1:** Out of 250 applications selected for review, only one application was found to be determined incorrectly.

**Corrective Action Needed:** Please notify the household with the adverse action letter, letting them know that their benefit will be changed due to an Administrative Review.

#### Verification

##### Commendations/Comments/Technical Assistance/Compliance Reminders

- Verification Collection Report was completed before November 15<sup>th</sup>.
- Four applications were verified. SFA manually selected applications for verification based off of the Alternate 1. SFA used the proper equation to complete verification, however, they counted 103 applications but recorded 99 applications on the VCR. Therefore, the SFA verified 4 applications instead of 3.
- When reviewing documents selected for verification, the household information provided should match the information on the documentation. If the information does not match the application, the verifying official should follow up with the household and/or the proper liaison to confirm that the information on the application is true. Documentation from the liaison should be kept on file, stating that they can vouch for the household.

## Findings and Corrective Action Needed: Verification

❑ **Finding #2:** Although the process was correct for verification, there were some inconsistencies with the information used for verification.

**Corrective Action Needed:** Please watch the [verification webcast](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html) and submit the confirmation e-mail once the class is completed ([https://media.dpi.wi.gov/school-nutrition/verification/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html)).

## Meal Counting and Claiming

### Commendations/Comments/Technical Assistance/Compliance Reminders

- Claims were validated on-site. SFA was claiming accurately.
- SFA collected meal tickets and then staff scan the cards into the software system after service. POS was properly conducted St. Thomas More School.

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

❑ **Finding #3:** During meal observation at St. Bernard, the point of service was before student's received all of their components, which caused several meals to be not be reimbursable. Reviewers discussed with FSD a couple of options for assuring that all components can be counted toward a reimbursable meal.

**Corrective Action Needed:** Please submit a statement as to how the POS will be corrected at St. Bernard School.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to the staff at Green Bay Area Catholic Education, Inc. for their warm welcome and cooperation throughout the administrative review. Reviewers took note of and greatly appreciated your conscientiousness with following the meal pattern. Furthermore, we greatly appreciated the food service director's attention to detail and impressive organization of documents. Keep up the great work!

### Comments/Technical Assistance/Compliance Reminders

#### Crediting Documentation

Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. As a reminder, a Child Nutrition (CN) label or Product Formulation Statement (PFS) is required for any combination food or Meat/Meat Alternate (M/MA) or other processed food not found in the USDA *Food Buying Guide* (FBG) for School Nutrition Programs. Product spec sheets are not acceptable forms of documentation.

Crediting documentation should be updated at least twice per year and as new products are purchased or substituted. It is important that CN labels are taken directly from the box. They can be kept in original format or photocopied as a clear, legible photocopy with the entire label visible. When CN

labels are not available for products, those products must have a current, accurate PFS detailing product composition and crediting information in order to be served.

This requirement is outlined in the vended meals agreement template, part B.3.d. :“The Vendor Agrees to maintain full and accurate records that document providing the SFA with daily production/transport sheets indicating how menu items contribute to meal pattern requirements and supporting documentation for contribution.”

### Menu planning worksheets

Menu planning worksheets are very helpful tools for ensuring meal pattern requirements are met at lunch (particularly vegetable subgroup requirements). It was great to see that the food vendor for St. Thomas More is using a menu planning worksheet to verify that the meals served meet meal pattern. However, it was noted that they are using an outdated form. Please begin using the updated [K-8 School](#) worksheet. They can also be found electronically on the [Menu Planning](#) webpage, under the Menu Planning Tools heading ([dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning)).

In addition, many of the food items listed on the menu planning worksheet were incorrectly credited. This did not create any daily or weekly food component shortages, but for accuracy in menu planning be sure to pay close attention to how the foods are being credited and use that information on the menu planning worksheet.

### Whole Grain-Rich

All grains offered and credited in school meal programs are required to be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as whole grain-rich. Grains that are not whole grain-rich cannot be credited toward the grain component.

The documentation provided for the tortilla chips for the week of review indicated that the chips are not whole grain-rich. “Yellow corn” was the first ingredient, and because it does not say “whole yellow corn” it cannot be considered whole grain. These chips must be discontinued and a whole grain-rich alternate used instead.

USDA has a very thorough [Whole Grain Resource](#) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

### Production Records

Production records are required to document that food served to students meets meal pattern requirements. Production records need to include the milk types available and actual usage (or milk recipe). A milk recipe is documentation of average milk usage by meal and grade group. When a milk recipe is on file, total milk usage must still be recorded on production records. Milk recipes must be updated twice per year or when you notice that students’ preferences have changed. You can find instructions and a milk recipe template on our [Meal Pattern Components](#) webpage, under the milk heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk>).

In addition, extra menu items also need to be documented on your production records, as they are included with the reimbursable meal. Condiments need to have the planned portion size (eg, 2 packets or 1 pc cup) and actual usage. Technical assistance was provided to update production records to fix the following issues:

### St. Bernard

- Include the serving site name
- Include each salad bar offering on your production records with planned serving sizes. Currently the production records say Salad bar 1/4c and then the salad bar offerings are listed on the temperature sheet.

### St. Thomas More

- Meal pattern used (K-8)
- Milk types (by type or milk recipe)
- Condiments included in the meal, including planned portion sizes and actual usage
- Number of adult meals
- Meal pattern crediting - this could be on the Vendor's production sheet, or on a separate sheet. It needs to be documented somewhere so that staff know how the foods credit towards the meal pattern so they know how to serve the foods based on Offer vs. Serve.

### Vegetable subgroups

The mixed vegetables planned for St. Bernard's on Monday of the week of review contained carrots, corn, green beans and peas. This mixture was being credited towards the Other vegetable subgroup, however, because the vegetable blend contains starchy vegetables (corn and peas) it can only be credited towards the Additional vegetable subgroup. Please update your crediting of this vegetable mixture.

### Recipes

Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements. St. Thomas More has vended meals and the following recipe is not standardized:

- Macaroni & Cheese - 5 oz (½ cup)
  - The instructions indicate that the cook should "season to taste." The recipe should have exact instructions for how to make the food and the person preparing the recipes should not deviate from those instructions. This guarantees a consistent product, as well as the assurance that the meal meets the meal pattern. Please remove that statement from the recipe.

Visit our [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional information (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) or [contact a Public Health Nutritionist](https://dpi.wi.gov/school-nutrition/directory) for assistance (https://dpi.wi.gov/school-nutrition/directory).

### Signage

It is required to post signage visible to the students that indicates the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable. St. Bernard school did have a sign indicating the menu for the day, but it did not say what students could select under Offer versus serve (OVS). The lunch signage should list the five components and inform students that under OVS, they must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination of fruit and vegetable. Please add this statement to your current signage, print editable signage from the DPI [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) web page or request signage via the resource order form found on [Team Nutrition's](https://dpi.wi.gov/team-nutrition) web page (found at the bottom of the page) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage; https://dpi.wi.gov/team-nutrition)

### Salad Bar

The menu planner must plan a specific portion size for each of the fruits and vegetables offered on the salad bar that he or she intends students to take. If the fruits or vegetables on the salad bar are used to meet the weekly requirements, which is the case at St. Bernard, portion sizes of at least 1/8 cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is taken. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as ½ of the volume served. Please add signage to your salad bar.

### On site Meal Observation

St. Bernard: Ten non-reimbursable meals were observed during on site meal observation.

After discussion with the food service director, it was noted that usually the main line contains the minimum requirements for a reimbursable meal (including a ½ cup vegetable). However, on the day of observation only one hash brown patty was served and this patty only credits as ¼ cup vegetable. Staff were not made aware of this change and therefore some meals did not contain the required minimum amount of ½ cup fruit or vegetables on their tray. After the error was identified, staff were alerted to this change so that they could watch trays more carefully during subsequent meal service times. Staff did require students, during the following meal service times, with less than a ½ cup fruit or vegetable on their tray to visit the salad bar to take additional vegetables. However, there was no one monitoring the salad bar station to ensure that those students did in fact take enough to meet the ½ cup requirement. Of the students who were sent to get more vegetables, none selected enough to meet the requirement (one student just selected 2 baby carrots, and another just a pinch of salad). Reviewers believe that because the salad bar was off to the side of the main service line, and the Point of Service (POS) was a bit unclear, the set-up of the meal service lines could be adjusted for better flow and better monitoring of reimbursable meals.

St. Thomas More: No issues with meal service at this site. Staff have a good understanding of Offer vs. Serve and all meals observed were reimbursable.

### 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, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

The pre-K students at both St. Bernard and St. Thomas More come down for lunch at the same time and same place as the other grade groups. Therefore, the co-mingling flexibility from USDA is being used, and it is acceptable for pre-K students to be served the K-8 meal pattern. Thank you to the food service director for staying up-to-date with these new CACFP requirements and flexibilities.

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>).

## Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding #1:** Signage at St. Bernard did not explain what constitutes a reimbursable lunch to students, nor did it contain the required statement to select a least ½ cup fruit or vegetable.

**Corrective Action Needed:** Please update your signage to include the required statement, “Build a complete meal by selecting foods from at least 3 groups, including a ½ cup of fruit, vegetable, or a fruit/vegetable combination” and submit a copy or picture as corrective action.

❑ **Finding #2:** Tortilla chips used at St. Thomas More during the week of review are not whole grain-rich.

**Corrective Action Needed:** Discontinue the use of the tortilla chips. If you choose to find another tortilla chip, submit crediting documentation for the new product. This could be a Product Formulation Statement (PFS) obtained directly from the manufacturer, or a picture or photocopy of the product packaging and include the nutrition facts panel and ingredient list.

❑ **Finding #3:** The mac and cheese recipe says in the instructions to “season to taste.” This statement is not standardized and should be removed from recipe instructions.

**Corrective Action Needed:** Remove the statement “season to taste” and submit a copy of the updated recipe as corrective action. *Corrected onsite, no further corrective action required. Thank you!*

❑ **Finding #4:** Production records for St. Thomas More were missing the following key pieces of information:

- Meal pattern used (K-8)
- Milk types (by type or milk recipe)
- Condiments included in the meal, including planned portion sizes and actual usage
- Number of adult meals
- Meal pattern crediting - this could be on the vendor’s production sheet, or on a separate sheet. Crediting documentation must be provided to staff so that they know how to serve foods based on Offer vs. Serve.

**Corrective Action Needed:** Submit one week of completed production records, including the information listed above.

❑ **Finding #5:** The menu planning worksheet for St. Thomas More was incomplete and did not contain accurate crediting for some of the foods served during the week of review.

**Corrective Action Needed:** Obtain the latest [menu planning worksheet](#) and update to include accurate crediting for all food items served for the week of review, April 16-20, 2018, and submit as corrective action.

❑ **Finding #6:** Ten non-reimbursable meals observed at St. Bernard due to a misunderstanding among staff of hash brown crediting. In addition, the meal service line had an unclear POS, which made it difficult for staff to accurately watch for reimbursable meals.

**Corrective Action Needed:** Submit a written statement on how errors will be corrected and avoided in the future. Fiscal action will be taken for the ten non-reimbursable meals observed.

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

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

- Great job at managing the Nonprofit Food Service Account.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage ([dpi.wi.gov/nutrition/online-services](http://dpi.wi.gov/nutrition/online-services)).

#### Annual Financial Report (AFR)

- GRACE is part self operated and part vended. The FSD broke out the expenses and revenues for each of these on the 2016-2017 AFR appropriately.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- 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 "Ala Carte", report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
  - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

#### 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 snapshot 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) (<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) <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
- Funds in student meal accounts are considered a liability until a meal is purchased. When 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 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>).
- SFA has a detailed unpaid meal charge policy on file.
  - SFA mentions that they will not refund checks under \$5, but USDA requires SFAs to.

### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

☐ **Finding # 1:** SFA has a detailed unpaid meal charge policy on file, but it mentioned that the SFA will not refund checks under \$5. USDA requires SFAs to refund all money left in a student’s account.

**Corrective Action Needed:** Please submit a statement of understanding that SFA’s must refund families even if it is below \$5 and a timeline to update the meal charge policy.

### **Paid Lunch Equity**

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

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

### **Revenue from Nonprogram Foods**

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

- SFA only sold adult meals and extra milks.
- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).
- [Nonprogram Foods In a “Nutshell”](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

### **Indirect Costs**

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

- Indirect costs were not charged to the food service account.

## **4. GENERAL PROGRAM COMPLIANCE**

### **Civil Rights**

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

- Civil Rights trainings were documented and on file.
- SFA completed the Civil Rights Self Evaluation form and had a process for filing complaints.

### **Special Dietary Needs Reminders**

- 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>).

### **On-site Monitoring**

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

- Food Service Director completed in depth assessments of each school using the On-Site monitoring forms before the due date.

### **Local Wellness Policy**

#### **Commendations/Comments/Technical Assistance/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.
- SFA met the minimum requirements and had a thorough wellness policy in place.

### **Smart Snacks**

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

At the time of the on-site review there were no competitive foods or beverages sold at either of the school sites reviewed. 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>).

## **Professional Standards**

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

- SFAs was documenting all required training information and maintaining a central tracker with the name of each 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).

### **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 #1:** Most of the staff completed the required training hours for the current school year, but some of the managers did not.

**Corrective Action Needed:** Please provide a training plan for meeting the required training hours for the managers.

## **Water**

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

- Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

## Food Safety and Buy American

### Commendations/Comments/Technical Assistance/Compliance Reminders

#### Food Safety Inspections

- Each school in the SFA had two food safety inspections for the year.
- Each of the reviewed schools had temperatures logs for the whole school year.

#### Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling.
- Each school reviewed had a comprehensive and site specific plan.

#### Time as Public Health Control

- When using “Time as a Public Health Control:”
  - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
  - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
  - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.
  - Reviewer mentioned that SFA should have an SOP on file to explain that all food is discarded after service for St. Benard’s School.

#### Buy American Provision

The USDA requires that a School Food Authority (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.

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

SFAs must monitor contractor performance to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating that the product, “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 in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the 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.

- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the Food Service Director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the Introduction to the Procurement Policy and Procedures Handbook
- Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

More information on this new requirement, and a template you can use to [track noncompliant products](#), can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

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

☐ **Finding #2:** The SFA does not have a noncompliant list for tracking non-compliant products from the food vendor. The following products were noted during the onsite review:

- Canned sliced ripe olives - Morocco
- Canned sliced pineapple - Indonesia
- Refrigerated tomatoes - Mexico

**Corrective Action Needed:** Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A [template form](#) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

### **Reporting and Recordkeeping**

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

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

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

#### **Summer Meals**

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at GRACE, 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

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Fresh Fruit and Vegetable Program (FFVP)**

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

- SFA's offsite claim validation was perfect. SFA is new to the program this year but the FSD is very detail-oriented and is doing a great job.
- Teachers were provided a lesson plan for each fruit or vegetable offered and then engaged the class in a discussion about the item being served.

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 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).

