

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Holy Rosary School, Medford

Agency Code: 60-7129

School(s) Reviewed: Holy Rosary School

Review Date(s): Thursday, March 23 – Friday, March 24, 2017

Date of Exit Conference: March 24, 2017

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. We will be in Wausau July 11-13, 2017. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Holy Rosary School for the courtesies extended to me during the onsite review. Thank you for being available when answering questions and providing additional information during the offsite communication and onsite visit. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the offsite questions and requests, as well as pulling records for the onsite portion of the review.

The Authorized Representative and food service lead have taken classes in the past and plan to learn more this summer. Please track those trainings for professional standards continuing education.

The food service staff create a special bulletin board in the serving line with that month's birthdays. March had shamrocks; it looked very nice. They prepare a decorated table during the monthly birthday meal with treats. A salad bar is offered each day with vegetable toppings, two fruits and other extra items. The staff seems to problem-solve well and provide a great meal. Thank you for caring about the students and their lunch.

All students were kind and compassionate, as well as appreciative of a great meal being served. Classroom teachers mark off students after they have selected a reimbursable meal, then the office enters the meal into the software system, "Option C", to be claimed monthly for reimbursement.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- The business manager is the determining official and attended the summer DPI class to understand the rules better. He has a great overall understanding of the meal application determining process.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits for which they have been determined eligibility.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.
- Once applications are determined, the authorized representative maintains confidentiality by limiting access to that information.
- The meal counting and claim was conducted perfectly.

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- Fifteen eligibility determinations were reviewed and no errors were identified.

Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application. Please note the date determination took place and the signature of the Determining Official.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, you should not convert it to annual, but using the Income Eligibility Guidelines (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility->

[guidelines-1617.doc](#)) you would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).

- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss.

Zero Income

- Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies that there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

Household Size Box

- As a reminder, for the household income size box:
 - If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.
 - If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional office, any application that does not have this box completed is considered an incomplete application.

Incomplete Applications

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

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- LEAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian.
- The FNS website offers the application materials in 49 languages
<http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.
- The nonprofit food service account may be used to pay for translation services for food service purposes if there is a need to translate materials in a language that is not currently available.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Eligibility Letters

- Please use the approval letter templates for students found on the Direct Certification runs, or the approval/denial letter for paper applicants. There are separate letter templates to use in the verification process.

Verification

- When an application are chosen for verification, the person designated as the Confirming Official must review this application prior to contacting the family to ensure the initial determination is correct. There is a place for the Confirming Official to sign and date on the back of the application.
- The Verifying Official needs to sign and date the application when the verification process is completed.
- The application which was selected for the verification process in school year 2016-17 was chosen as an error-prone application, but could have been selected by random selection. This would help limit the same families picked each year. Keep in mind that for school year 2017-18, Holy Rosary School will need to select an error-prone application (if applicable) since the one application selected this current year did not reply, even after a reminder attempt.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility status decreases, the change cannot take place before 10 calendar days and a notice of adverse action must be sent in writing with the appeal rights procedures.

Meal Counting and Claiming

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance. Please be certain that all meal components are available to the student before the teacher marks the classroom sheet in the binder.
- When entering the claim, it is necessary to use the edit check report to identify your reimbursable meals.
- Meals must be offered to all students each day school is in session a full day, so DPI has posted a Field Trip resource page on our website to help schools offer a meal to students found under NSLP, then meal planning. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/field-trip-meals-templates.doc>
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to

take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

Findings and Corrective Action Needed

Verification

- ❑ **Finding #1:** The verification process was completed after the due date and there were areas that were not handled completely. Please review the entire verification process and consider taking the summer class on the free and reduced meal benefit and verification process class. DPI also has some webcasts on this subject: <http://media.dpi.wi.gov/school-nutrition/verification-process/story.html> and <https://media.dpi.wi.gov/school-nutrition/submitting-the-verification-collection-report/story.html>. The verification process begins with establishing the sample pool, selecting an application according to the correct method, asking the confirming official to check and sign the application, notify the household with an appropriate letter, review documents from family or reach out to notify them again, report results to the household in reference to meal benefit status retention or change and then the verifying official signs the back of the application.

This is the packet of verification forms: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>. This link is for the Notification letter:

[https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-must-check-reviewreview 1617.docx](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-must-check-reviewreview%201617.docx). This link is for the results letter:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-have-checked-1617.docx>.

Corrective Action Needed: Please submit a plan to address training to complete the verification process completely.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Comments/Technical Assistance/Compliance Reminders

- Make sure to review the training webcasts at <http://dpi.wi.gov/school-nutrition/training/webcasts>. There are short webcasts available that provide more information on each meal pattern component and on additional topics such as production records, product formulation statements, and Offer versus Serve (OVS). Also be sure to join us on the second Tuesday of every month at 2:00 p.m. for the *What's New with School Nutrition* webinar. More information can be found at <http://dpi.wi.gov/school-nutrition/training/whats-new>.
- The printed menu should list all components that are included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu with a statement that says that a variety of milk is offered daily as part of the reimbursable meal.
- You may choose to use either the **Preschool Traditional Food-Based Meal Pattern** or the **Healthy, Hunger-Free Kids Act Meal Pattern (HHFKA)** when serving meals to children ages 1-5 in the National School Lunch Program (NSLP). Note that these options will be replaced by the **updated CACFP meal pattern requirements and the NSLP and SBP infant and preschool meal patterns** when the final rule is implemented October 1, 2017. More information can be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and->

[preschool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf). Since you are currently offering all students K3-6 the same menu items in the same portion sizes, refer to the K-8 meal pattern at <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf> for menu planning requirements. A paper copy was given onsite.

- Consider using an optional Menu Planning Worksheet to help make sure menus meet meal pattern requirements. The menu planning worksheet helps you to see if you've planned all required components in at least their daily minimum amounts. It also helps to make sure you are meeting the weekly minimum requirements; you simply add up the quantities across each row and compare that to the weekly minimum listed for that age/grade group. A K-8 menu planning worksheet can be found at <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheets-lunch-grades-k8.doc>. A paper copy was left onsite.
- One of the best ways to make sure you are meeting weekly vegetable subgroups is to use the menu planning worksheet linked above. We discussed that it has been difficult to offer vegetables from the bean/pea/legume subgroup. Remember that the weekly requirement for the bean/pea/legume subgroup is ½ cup. Options include baked beans (which go well with entrees like hamburgers) and refried beans (which go well with entrees like tacos). Black beans and garbanzo beans (as well as other beans) can be offered cold on the salad bar. Quantity recipes using beans (including soups, stews, salads, and dips) can be found at https://whatscooking.fns.usda.gov/search/quantity/im_field_meal_components_credited/vegetable-beans-peas-180. Remember that green peas are a starchy vegetable and are not considered part of the bean/pea/legume group. Green beans are also not in the bean/pea/legume group; instead, they are considered an “other” vegetable.
- Production records should be a useful tool for the menu planner and kitchen staff. As a reminder, all food items offered with the reimbursable meal must be recorded on production records, including condiments and any items offered on the salad bar. A list of “must haves” for production records can be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-must-have.pdf>. A copy was left onsite along with three different salad/garden bar production record templates to consider. The templates are optional but provide more recording space if there is not enough on the main production records. These can be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>.
- Items offered on the salad bar including shredded cheese, cottage cheese, and croutons add calories, saturated fat, and sodium to school meals. Consider reducing or eliminating these items to help ensure compliance with dietary specifications. Many schools have successfully transitioned from a traditional salad bar to a “garden bar,” which offers students a choice of fruits and vegetables without all of the extras. The beginning of a new school year is a great time to make changes like this.
- Items that are not processed prior to purchase, such as raw meats, beans, eggs, fruits, vegetables, and milk, can be credited using the USDA Food Buying Guide (FBG). It is important to note that the FBG has been updated to reflect changes made with the new meal pattern. The print edition that was sent to schools has not been updated and is currently out of date. For the most accurate information, view or print the FBG sections at <http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>. Foods that do not have a standard of identity (with the exception of fresh fruits and vegetables) are not listed in the FBG and require further documentation such as a Child

Nutrition (CN) label or a product formulation statement (PFS) clearly detailing the ingredients and their creditable quantities in order to be served in child nutrition programs.

- A 125 count apple credits as 1 cup of fruit per the Food Buying Guide. The production records lists it as ½ cup so this should be updated to 1 cup.
- Food manufacturers are continually reformulating 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. It is strongly recommended to maintain and organize this information in a manner that is easy to reference and update, such as a binder or file folders divided into categories. These records should be reviewed and updated at least annually and as new products are purchased or substituted.
- Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates were left onsite and can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.
- The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined a sodium restriction using three targets to allow for a gradual implementation. The first target was implemented July 1, 2014. The second sodium target will take effect beginning July 1, 2017. We have a number of resources pertaining to sodium posted on the NSLP menu planning webpage at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>. The direct link to a table outlining the restrictions can be found at http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cnr_sodium.pdf. More information on the second sodium target can also be found in the USDA guidance memo SP 15-2017 at <https://www.fns.usda.gov/sites/default/files/cn/SP%2015-2017os.pdf>. Schools will be offered some flexibility with the target as described in the memo. In preparation for the second sodium target, consider looking into lower sodium options for your soup base, sauces, and condiments. Reducing the number of “extra” items offered with the reimbursable meal will also help to reduce the sodium content of meals.
- **Signage must be posted that indicates how to create a reimbursable lunch. Examples were left onsite. Free posters and other materials can be ordered by completing the online form at https://docs.google.com/forms/d/1rIGjKHSxkmtYtYsl4GuRIXL3NK3tEoZ-8JT-G9RKbgI/viewform?edit_requested=true.**
- All grain products crediting toward the lunch meal pattern must be whole grain-rich, meaning that at least 50% of the grains in the product are whole grains. The USDA has a Whole Grain Resource that provides tools and tips for identifying whole grain-rich products, available at <http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>. It was observed onsite that the saltine crackers in the storeroom are not whole grain rich. These could still be offered

with meals, but they would be considered an “extra” and would not credit toward the grain component. It is recommended to look for a whole grain rich alternative once the current stock is used up.

- It was observed onsite that a tortilla chip product in the storeroom lists “corn masa flour” as the first ingredient. In making traditional corn masa dough, the corn may be manufactured using wet milling procedures (corn treated with lime), where fractions of the kernel are washed away. In some instances, the processed corn has a nutrient profile similar to whole grain corn. When this corn ingredient is used in making corn masa dough for products such as tortilla chips, taco shells, and tamales, it may be acceptable as a whole-grain ingredient. These corn products, using corn treated with lime, may be used in meeting the whole grain rich criteria provided that the manufacturer meets the requirements for inclusion of the Food and Drug Administration (FDA) whole grain health claim and includes the claim on the product carton. The health claim states, "Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat and cholesterol, may reduce the risk of heart disease and some cancers." If this statement is not present, you will need to request a Product Formulation Statement from the manufacturer that shows that this product is whole grain rich. If the statement is not present and a Product Formulation Statement is not available, the product should not be used to credit toward the grain component. It could be served as an “extra” instead but remember that “extras” can still contribute calories, saturated fat, and sodium to the dietary specifications of meals. If unable to credit the tortilla chips toward the grains component, it is recommended to identify an alternative product to use that lists “whole corn” as the first ingredient.

Commendations from the consultant

- The attractive serving area is well-maintained. The open kitchen is clean and organized. The head cook works hard to learn the school nutrition programs and operate a nice kitchen.

Comments/Technical Assistance/Compliance Reminders from the consultant

- The condiment cart seemed to pose an issue for students to place the tray down while squirting on condiments. You may want to consider a different table set up to ease the task.
- Other groups use the kitchen facility, but seem to be considerate of the items stored there and needed for the federal meal program. Remember to keep control of your food and equipment items for the National School Lunch Program and address any food safety or security issues.
- A colorful plastic meal signage poster was left onsite and needs to be completed each day with all food and beverage items allowed to credit per the meal pattern. This helps students select a complete reimbursable meal while still adhering to the Offer vs. Serve concept.

3. RESOURCE MANAGEMENT

Commendations

- The business manager works well with the school nutrition program rules and obtaining training to understand new USDA rules. He is knowledgeable about the financial picture of the food service fund maintenance.
- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirement with a maximum yearly increase of \$0.10 as required by regulation. At the present time, this SFA is not required to raise the lunch price but needs to consider the overall financial picture when determining prices.

- This SFA is not required to complete the annual Nonprogram Food Revenue tool at this time since they only sell adult meals and milks. Please follow proper pricing for these items.

Comments/Technical Assistance/Compliance Reminders

Nonprofit School Food Service Account

- The SFA’s Child Nutrition program report provides a compilation of meals claimed, the reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch, breakfast or other programs. The Aids Register tracks all program deposits made to the SFA’s account and the amount deducted from the reimbursement to pay for shipping, handling and processing costs of USDA Foods. These may be found on our Online Services webpage: <http://dpi.wi.gov/nutrition/online-services>.
- SFAs must limit the net cash resources in order to not exceed three months average expenditures. The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.

Annual Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance on June 30 can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- When tracking revenues and expenditures, please keep in mind:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “A la Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.
- When developing the Unpaid Meal Charge policy, keep in mind that bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.
- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges, by July 1, 2017. For a snap-shot on what the policy must include, see the Unpaid Meal Charges “In a Nutshell” at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>. For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>, including:
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Revenue from Non-program Foods

- **Non-program Foods Revenue Rule SP-20-2016**
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
 - Non-program Foods “In a Nutshell” <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
 - Non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), and Catered Meals.
 - All non-program food costs including food, labor, equipment, purchased services, and other 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.
 - SFAs that sell **only non-program milk** and **adult meals** as non-program foods are exempt from completing the USDA Non-program Food Revenue tool <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>.
 - Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) may be used to determine 2017-18 SY

prices since rates aren't released until July 1 of each year.

Indirect Costs

- DPI does not allow the annual assigned indirect cost rate to be applied to the foodservice account. In Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
 - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

4. GENERAL PROGRAM COMPLIANCE

Commendations

- The lunch serving area had the most recent food safety inspection and the new “And Justice for All” posters on the bulletin board for public viewing.
- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. The civil rights training had been attended by the food service staff and documentation was available for review.
- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually. Thank you for having it filed appropriately.
- Holy Rosary School doesn't sell food or beverage items outside of the meal program, so they are not affected by the Smart Snacks rule at this time.
- Water is available at no charge to students during the lunch meal service in the cafeteria.
- All pieces of cooling equipment have the internal temperature taken and recorded daily on a temperature log. Thank you for keeping this documentation on file.
- All food service employees have a signed Employee Reporting Agreement on file. Please include any substitute or new workers and update the form each school year. Nice job!

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

Nondiscrimination Statement

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

Special Dietary Needs

- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to a students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the DPI School Nutrition Team website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.

Processes for complaints

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance. The form to assist in filing these complaints can be found on the DPI SNT website at https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf.

Local Wellness Policy Summary for Administrative Review

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

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

- Holy Rosary School has begun revising their original Local Wellness Policy, but need to include several items, as indicated on the checklist, to be compliant with the requirements by June 30, 2017.

Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

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

A summary of the requirements can be found at:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/LWP%20Summary%20-%20Final%20Rule.pdf>. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Smart Snacks in Schools

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that is effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
 - Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management. Directors hired before July 1, 2015 do not need to meet the hiring standards, but do need to follow the continuing education hours.
 - 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.).
- ☐ **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Directors	Managers	Other Staff	Part Time Staff
		(20 hrs or more/week)	(less than 20 hrs/week)
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

Food Safety, Storage and Buy American

Food Safety Inspections

- Every school operating USDA School Child Nutrition programs, must have two food safety inspections during each school year, which include an onsite Food Safety Inspection and one which is a review of the site’s Food Safety Plan.

Food Safety Plans

- The Food Safety Plan was available for review. Please review the white binder and update any Process 1-2-3 foods and Standard operating Procedures (SOP), plus include the names of food service staff and volunteer servers.
- The USDA FNS Office of Food Safety is excited to share a new educational resource for school nutrition professionals. *A Flash of Food Safety* is an educational video series designed to help busy school nutrition professionals understand and practically apply safe food practices. The videos, available in English and Spanish, address five food safety topics: *Handwashing: Why to Wash Your Hands*, *Handwashing: How to Wash Your Hands*, *Calibrating a Thermometer: Ice Water Method*, *Calibrating a Thermometer: Boiling Water Method*, and *Active Cooling with a Chill Stick*.

Each “flash” video is 2-4 minutes long and can be accessed online via YouTube. They are easy to view from a desktop, laptop, tablet or smart phone – perfect for onsite training! Individuals can earn 15 minutes (1/4 hour) of continuing education for [Professional Standards](#) when they watch all five videos in the series. A certificate of completion is available through the USDA FNS Office of Food Safety website. To view *A Flash of Food Safety*, please visit www.fns.usda.gov/ofs/food-safety-flashes

Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)). Several groups use the food storage facilities; please be mindful of food safety and security.

Time as Public Health Control

- When using “Time as a Public Health (Temperature) Control”:
 - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
 - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
 - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees 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 Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS foods must be discarded.

Must be kept above 135 on hot line with mechanical heat	Must be kept under 41 degrees with mechanical refrigeration
Animal protein – eggs, meat, chicken, fish, shellfish, etc	Milk and cheese, including house made dressing made with milk
Tofu and soy products –texturized vegetable protein, hot edamame	Hard boiled eggs
Baked potatoes	Tofu, edamame, soy
Heat-treated plant food, such as cooked rice, beans, vegetables	Sliced melons, cut leafy greens, cut tomatoes
Anything with cheese	Untreated garlic-and-oil mixtures
	Sprouts

Buy American

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

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

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>.

Reporting and Recordkeeping

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

Summer Food Service (SFSP) Outreach

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Holy Rosary School, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. This may be included in a newsletter sent home to families or put up posters <https://dpi.wi.gov/sites/default/files/imce/community-nutrition/doc/Summer%20Food%20Summer%20Fun%20Postcard.docx> at the school. SFAs can inform families of summer meals via the following methods:
 - Promotion of the summer meals locator <https://batchgeo.com/map/53a36c0a01f300544f13fea4c2f341a8> on the DPI Summer Meals website <https://dpi.wi.gov/community-nutrition/sfsp>
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
 - Promotion of the USDA Summer Food website <http://www.fns.usda.gov/summerfoodrocks>

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
Phone: 608.266.7124
e-mail: amy.kolano@dpi.wi.gov

- ❑ **Finding #2:** Although the civil rights training <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx> had been attended by the food service staff, it is necessary

for the determining official, confirming official and teachers who mark off students taking meals to also participate in this training.

Corrective Action Needed: Please complete this task and include the signed attendance record https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cr_trn_log.doc from participants, along with a plan to complete this in the future.

- ❑ **Finding #3:** Per the Professional Standards in Schools rule, SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, full-time or part-time staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Corrective Action Needed: Please submit a plan to track continuing education for all food service staff (regular, substitute and volunteer), school nutrition director/determining official and confirming official.

- ❑ **Finding #4:** The Buy American provision is required for food products which are purchased by the SFA. There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard in circumstances when use of domestic products is truly not practicable. These template may assist with tracking noncompliance products <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>.

Corrective Action Needed: Please contact your food supplier to see if domestic products are available at a reasonable price for these items found and any others you may notice: California Blend frozen vegetable blend (Mexico), canned pineapple (Thailand), fresh carrots (Canada), romaine lettuce (Mexico), etc. If you are not able to find a domestic product, please use this noncompliance product template <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>. Submit a plan of action and results for these products.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

