

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

School Food Authority: St. Mathew's Lutheran School

Agency Code: 62-7738

School(s) Reviewed: St. Mathew's Lutheran School

Review Date(s): 3/13/18

Date of Exit Conference: 3/15/18

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](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.US Department of Agriculture.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.US Department of Agriculture.gov/healthierschoolday).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Mathew's Lutheran 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. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

Applications

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- 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.

Public Release

- SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- Finding #1:** The Public Release was not submitted to a local newspaper or distributed to local grassroot organizations (public libraries, food pantry, churches, etc.) and unemployment offices.
Corrective Action Needed: Please submit a statement of the process to use for school year 2018-19 to include the appropriate places/agencies when distributing the Public Release.
- Finding #2:** The online contract does not have correct hearing official listed.
Corrective Action Needed: Please update your online contract with the correct hearing official and notify DPI when this is complete, so the change may be approved.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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.
- The Verification process must be complete by November 15 each year.

Findings and Corrective Action Needed: Verification

- Finding #1:** The Verification Collection Report was not entered into the system correctly.
Corrective Action Needed: Please submit a statement that going forward, the Verification webcast will be viewed and the VCR instruction manual followed for correct submission.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- All claims must be submitted within 60 calendar days of the end of the claiming month.

Findings and Corrective Action Needed: Counting and Claiming

- ❑ **Finding #1:** Claims for October and November 2017 were not submitted within the required 60 day submission timeframe.

Corrective Action Needed: Please submit a statement that going forward all claims will be submitted within 60 days of the end of the claiming month.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Comments/Technical Assistance/Compliance Reminders

Thank you to the St. Matthew's Lutheran School Food Service Director, Nutrition Staff and all of the volunteers at St. Matthew's Lutheran for the time and commitment that everyone has devoted to operating a successful school nutrition program. Ensuring all of your students have access to healthy meals. Everyone's openness and willingness to ask questions and learn is wonderful. We also witnessed great interaction between the onsite serving staff and students.

Training

- Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics including:
- [USDA food recipes](https://www.youtube.com/watch?v=8tp4WCWcryg&list=UUNnBe12n6q4QT39Fz2y7BPg) (https://www.youtube.com/watch?v=8tp4WCWcryg&list=UUNnBe12n6q4QT39Fz2y7BPg)
- [Offer Versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#cyc) (https://dpi.wi.gov/school-nutrition/training/webcasts#cyc)
- DPI's [Webcast Page](https://dpi.wi.gov/schoolnutrition/training/webcasts) (https://dpi.wi.gov/schoolnutrition/training/webcasts)
- The U.S. Department of Agriculture encourages schools to utilize [Smarter Lunchroom](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp_ch6.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp_ch6.pdf) techniques to encourage students to make healthy food choices. Smarter Lunchrooms use research-based principles that lead children to make healthy choices but still offer a full spectrum of choice. All Smarter Lunchroom techniques are low- or no-cost, sustainable, and focus on improving the lunchroom environment to promote healthful eating behaviors. [Smarter Lunchrooms Strategies](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies).

Standardized Recipe

- Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient (even if it is water) should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service kitchen. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update recipes with current ingredients in stock.
- Standardized recipe are needed for menu planning to ensure that the portions offered are actually what is intended. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice 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's *What's Cooking?* Quantity recipes, especially when substitutions are made.

- Continue to use the resources on our website regarding [recipe standardization](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained.

Offer Versus Serve (OVS)

- OVS is not required for grade K-8 students, although it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, grade K-8 students must be served $\frac{3}{4}$ cup vegetable and $\frac{1}{2}$ cup fruit to create a reimbursable meal. If OVS is implemented, then students can choose three of the five components offered, including $\frac{1}{2}$ cup fruit, vegetable, or combination to create a reimbursable meal.
- The volunteer serving lunch on the day of review was somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. Although all students observed at lunch took a reimbursable meal, it is important for everyone serving lunch to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs) is available on our NSLP requirement website under the offer versus serve (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>). An [Offer Versus Serve webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#cyc) is also available to be viewed from any computer at any time (<https://dpi.wi.gov/school-nutrition/training/webcasts#cyc>).

Meal Pattern Documentation under a Joint Agreement

- Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted.
- This requirement is outlined in the joint agreement template, #12: "The seller shall comply with all other requirements of their DPI agreement/application as it produces and makes available meals to the Purchaser, including providing the Purchaser with daily production/transport sheets indicating how menu items contribute to meal pattern requirements and *supporting documentation for contribution*."
- More information about crediting documentation can be found on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Volunteers in the Kitchen

- Volunteers are a wonderful resource for a small food service operation. Educating your volunteers is very important. Everyone who interacts with your students during the lunch service must follow the NSLP regulations. Adding food items to the program is not permitted. Offer hungry students more fruits and vegetables, if quantity is an issue, please ask your joint provider for more.
- [Meal pattern Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>). **Post this in the Kitchen.** K-8 lunch calorie range is 600-650. Students must be offered, if this is the meal service option you choose, at least $\frac{3}{4}$ cup vegetables and $\frac{1}{2}$ cup fruit daily.

Offer the students more fruit and vegetables if they indicate that they are still hungry. Technical Assistance was given on site regarding this issue.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding #1:** Standardized Recipes are required for all menu items that contain more than one ingredient, and need to be standardized to the kitchen the item is being prepared in with the ingredients used on site.
Corrective Action Needed: Please submit a standardized recipe for each of the following:
 1. Mashed Potatoes
 2. Chicken and Gravy
 3. Meatballs and gravy
- ❑ **Finding #2:** Offer versus Serve was not properly implemented.
Corrective Action Needed: Please decide which meal service is best for your program and include a statement of your intentions going forward to either use the serve method of lunch service or if you are going to use the offer method. Submit a written statement describing what the FSD will do to ensure everyone is properly educated and how this is to be implemented. If you'd like to discuss, please contact the PHN on your review.
- ❑ **Finding #3:** No crediting documentation or food labels were located on site.
Corrective Action Needed: Please work with the FSD to maintain a complete set of documents of the foods served at St. Matthew's Lutheran school. Please explain how this will be accomplished in a brief statement.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- 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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found on our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<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

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** Annual Financial Report does not have any revenues or expenses allocated to nonprogram foods and the SFA sells adult meals and cold lunch milk.
Corrective Action Needed: Please provide a statement going forward that all nonprogram food expenses and revenues will be broken out from NSLP and allocated to the nonprogram foods line on the annual financial report. We have a resource on our [Financial Management](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) webpage to aid you in this calculation (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- ❑ **Finding #2:** The school has no written unpaid meal charge policy, which was required to be in place and distributed to families by July 1, 2017.
Corrective Action Needed: Develop a timeline for a written unpaid meal charge policy and distribution to households.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, **“This institution is an equal opportunity provider.”** Both statements should be in the same size font as the other text in the document.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- 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.
- All SFAs must have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Medical statements must include
 - A description of the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, and
 - An explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to 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>).
- Food Service should have copies of all medical statements for students within their school to provide correct meal substitutions.

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** Civil Rights training was not conducted for all staff and volunteers at St. Matthew's Lutheran School for the 17-18 school year.
Corrective Action Required: Please have all employees and volunteers view the [Civil Rights PowerPoint](#) on our website and submit the sign-in sheet as corrective action (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>).
- ❑ **Finding #2:** The school does not have a policy in place for handling discrimination complaints in the Child Nutrition Programs.
Corrective Action Required: Please develop and submit a policy for handling discrimination complaints in the Child Nutrition Programs.

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 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.
- At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
 - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
 - Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
 - Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
 - Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
 - Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
 - Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
 - Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).
- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team

Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

- **SFA is required to review and update Local Wellness Policy (1002)**
Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. Your SFA has not reviewed nor updated your policy within the past 2 years. Additionally, your SFA does not have documentation indicating when and how the plan is/will be reviewed and updated.
- **SFA is required to complete an assessment of the Local Wellness Policy (1005)**
Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](#) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy webpage](#) (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your schools report is available at the [Wisconsin Health Atlas webpage](#) (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.
- **SFA required to inform the public of the results of the most recent assessment (1006)**
Technical Assistance for 1006, if do have a policy: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include a plan to improve upon the results of the assessment.

Findings and Corrective Action Needed: Wellness Policy

- ❑ **Finding #1: SFA LWP meets some but not all requirements as stipulated above (1000).**
Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule. The LWP needs updated language regarding nutrition promotion and guidelines for all foods made available (sold and non-sold) on campus during school day. Additionally, LWP requires a plan for measuring implementation. Please include:
 - The updated new language
 - The official responsible for oversight of the LWP to ensure school compliance with the wellness policy

- How the public is notified and who is involved on the committee
- Triennial Assessment information
- Other School Based Strategies for Wellness

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information 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>).
- At the time of the on-site review, St. Matthew's Lutheran School was not selling and did not sell competitive foods or beverages. 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 and non-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 under Tracking Tools (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program "director". A program "director" is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.

- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
 - SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, 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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>).

Annual Training Requirements for All Staff

Directors: 12 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

Findings and Corrective Action: Professional Standards

- ❑ **Finding #1:** The new food service director did not meet new director hiring standards.
Corrective Action Needed: Please apply for an exception from the Assistant Director of School Nutrition Team karrie.isaacson@dpi.wi.gov and complete the designated training plan.
- ❑ **Finding #2:** Training is not being monitored on a tracking tool.
Corrective Action Needed: Include all current training hours for each food service employee and volunteer onto the DPI tracking tool and submit as part of corrective action.

Food Safety and Storage

Commendations/Comments/Technical Assistance/Compliance Reminders

Employee Reporting Agreements

- All food service employees and volunteers must have annual food safety training and a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).

Food Safety Inspections

- The most recent food safety inspection must be posted in a publically visible location.

Food Safety Plans

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

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.

Kitchen Sanitation and security

- 7CFR 210.13 (d) Storage, which states, “the school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.”
- Wisconsin Food Code requires the use of hair restraints in all food preparation areas.
- Because of the above sanitation and security regulations, it would be a best practice to restrain students from entering the kitchen during food preparation and serving times.

Findings and Corrective Action: Food Safety

- Finding #1:** No “employee reporting agreement” are on file for all food service staff and volunteers.
Corrective Action Needed: Please have all food service employees and volunteers fill out an employee reporting agreement and submit copies as corrective action.
- Finding #2:** The most recent Food safety inspection was not posted out in cafeteria in public view.
Corrective Action Needed: Please post most recent inspection in public view and send picture of placement as corrective action.
- Finding #3:** Since St. Mathew’s Lutheran School does not prepare any food on site or reheat any product, all products in the school would be considered Process 1 items.
Corrective Action Needed: Please update your food safety plan to include only site specific Standard Operating Procedures.

- ❑ **Finding #4:** Since all TCS foods are held outside of mechanical refrigeration or heat, the use of Time as a Public Health Control must be used. Standard operating procedure (SOPs) for Time as a Public Health Control is not included in the food safety plan.

Corrective Action Needed: Add and adapt site-specific Time as a Public Health Control, SOP to the food safety plan and submit an updated SOP as attachment via email.

Buy American

Comments/Technical Assistance/Compliance Reminders

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- 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 as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- 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 the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be 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 manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. 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* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

- 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, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- **If the SFA receives any nondomestic products, these products must be recorded on a Noncompliant Product List. 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>).**

Findings and Corrective Action Needed: Buy American

- ❑ **Finding #1:** Since St. Mathew’s Lutheran School is joint agreement with De Soto School District, De Soto tracks the non-domestic products which are received, but this information is not shared with St. Mathew, and each SFA must retain its own noncompliant list.
 - Corrective Action Needed:** Please contact De Soto School District and have them share copies of their noncompliant lists with St. Mathew to be retained on site.
 - **Label does not identify country of origin:** In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the TA notes above for sample certification language. This will be treated as TA for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

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 St. Mathew’s Lutheran School, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. De Soto public school offers summer meals.
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

Findings and Corrective Action: SBP and SFSP Outreach

- ❑ **Finding #1:** Summer food service outreach was not provided to students.
 - Corrective Action Needed:** Please provide a statement that you will notify students of the ability to receive free summer meals at De Soto public school.

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.