

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

School Food Authority: Our Redeemer Lutheran School Agency Code: 64-7237

School(s) Reviewed: Our Redeemer Lutheran School

Review Date(s): 12/13/17

Date of Exit Conference: 12/13/17

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 Our Redeemer Lutheran School 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

Commendations/Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- Direct Certification had been run in the appropriate timeframes.

Verification

- Verification Collection Report was complete and submitted by November 15.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

2. MEAL PATTERN AND NUTRITIONAL QUALITY

COMMENDATIONS/COMMENTS/TECHNICAL ASSISTANCE/COMPLIANCE REMINDERS

Thank you to all of the staff at Our Redeemer Lutheran School for their warm welcome, timeliness, and cooperation during this Administrative Review (AR). Thank you to the school nutrition professionals for providing information prior to coming on-site. The efforts to offer food items that were low-sodium, reduced-fat, light, and fat-free were noted. The nutrition professionals were positive, enthusiastic, inquisitive, and worked well with the students. We enjoyed our time at Our Redeemer Lutheran School.

Meal Pattern Responsibility with a Joint Agreement

- Although you are purchasing meals through a joint agreement, it is ultimately the School Food Authority's (SFA) responsibility to ensure all meal pattern requirements are met. Information on meal pattern requirements is found on the [NSLP Meal Requirements and Nutrition Assessment](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) page of our website (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Crediting Documentation

- Any processed product that is not listed in the [USDA Food Buying Guide for School Meal Programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (<http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>) requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern.
 - A complete **CN** label includes the following: CN logo, product name, ingredient statement and inspection legend. It is important to save actual CN labels from product packaging that includes these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.
 - A complete **PFS** must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company

letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). Remember to update records when new products are purchased or when product formulations change throughout the school year. More information about crediting documentation can be found on the [Meal Pattern Components](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>).

- Current nutrition facts labels, CN labels, and/or manufacturer's PFS clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available on-site where meals are served, even if meals are prepared off-site. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted. Labels were not available on-site.
 - 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."*

Production Records

- Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Production records are intended to be useful tools to record information prior to production, during production, and following production. Currently, there is missing information on the production records being used including recipe and food item reference numbers, planned portion sizes, planned number of portions, and planned portion size of and actual usage of condiments and salad bar options.
- Be specific on production records about the identity, brand, and description of the items served. Planned portion sizes must be included on production records to document the component was planned and served. The production record should reflect if substitutions are made, if any. Fruit sizes (e.g. case count) should also be recorded. It is helpful to include not just portion size, but also crediting, on the production records.
- Planned portion sizes are required for every meal component. Even in self-service, such as the fruit, salad bar, and condiments, the menu planner must plan a specific portion size for what they intend for students to select. While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements ("Must haves and Nice to haves" list) can also be found at that link.

Standardized Recipes

- Standardized recipes are required for all menu items that have more than one ingredient. The walking tacos do not have a standardized recipe. The "tacos" or "soft shell taco" recipe cannot be interchangeable with the walking taco recipe, since these are two separate menu items with different ingredients.
- Additionally, recipes should be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen. Adjusting standardized recipes can change crediting, which may result in a daily and/or weekly shortage of a food component. For example, when observing production at the high school for the walking tacos, the recipe was written out on a sheet of paper without all of the essential information of a standardized recipe. Guidance on standardized recipes can be found on the [Recipe Resources and Tools](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Portioning Utensils

- Planned, controlled portion sizes are essential for compliance with meal pattern requirements and dietary specifications. Portion control teaches students good eating habits by demonstrating and providing appropriate portion sizes of foods. The salad bar offered shredded cheese, sour cream, olives, salsa, and pickles in addition to the reimbursable meal. These food items should be portion controlled using appropriate utensils for their nutrition label serving size if not contributing toward the meal pattern. Tongs are not appropriate portion control utensils. For example, salsa and sour cream should use the appropriate spoodle for the serving size on the nutrition facts label. To figure out the appropriate serving utensil for shredded cheese, weigh out one serving and find a spoodle in which this serving size fits best.

Extras (Non-Creditable Food Items)

- Extra, non-creditable items such as cheese and condiments were offered in addition to the reimbursable meal. These foods are not being credited toward the meal pattern as it is after the point of service (POS), but must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra, non-creditable items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extras are frequently served. These foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal.
- Peanut butter was offered before the POS. According to production records, peanut butter is not being credited toward the meal pattern and is an extra. Peanut butter must be taken into account when determining the dietary specifications for the meal (calories, saturated fat, trans fat, and sodium), even though it does not contribute toward the meal pattern requirements. Peanut butter can be a significant source of calories, saturated fat, and sodium.
- Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Condiment usage is not monitored nor are portion sizes communicated to students. Please monitor your school's condiment usage and communicate appropriate portion sizes to students through signage. This can be done with a photo of what one tablespoon of Ranch dressing looks like or using signage such as "One pump, please!" on self-serve pump bottles.
- The Weekly Nutrient Calculator can be used to analyze calories, saturated fat, and sodium values weighted over the week. When analyzing nutrients, remember that the values must be weighted according to popularity (how the menu planner plans for each item to be selected). This tool can quickly show both high and low menu items, as well as high or low days on the menu, making it quick to determine which days could be mixed and matched throughout the month. This tool can be found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>) under 'Menu Planning Tools.' The 5-day version should be used for your site.

Fruit and Vegetable Crediting

- According to the USDA [Food Buying Guide \(FBG\) for School Meal Programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (<http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>), one clementine or "Cutie" credits as $\frac{3}{8}$ cup fruit. Therefore, if a student only selects one clementine, this is $\frac{3}{8}$ cup. Two clementines need to be selected in order to obtain a full $\frac{1}{2}$ cup portion. Consider including signage on the service line indicating that two clementines credit as $\frac{1}{2}$ cup fruit.
- According to the FBG, a 1.6 ounce bag of baby carrots credits as $\frac{1}{4}$ cup red/orange vegetable. Two 1.6 ounce bags of baby carrots must be selected in order to obtain a full $\frac{1}{2}$ cup portion. Consider including signage on the service line indicating that two 1.6 ounce bags of baby carrots credit as a $\frac{1}{2}$ cup vegetable.
- Portion sizes served must be full, level scoops in standardized measuring utensils. For example, grapes at the school were portioned into 4 fluid ounce cups but were left on the stem. A full $\frac{1}{2}$ cup of grapes must be included in the portion to be the required $\frac{1}{2}$ cup fruit selected under Offer Versus Serve (OVS) if they do not select any other fruits or vegetables.

- It is important to know how fresh fruits and vegetables credit towards the meal pattern. Some commonly used fresh fruits credit as follows:

- Apple = 1 cup fruit
- Orange = ½ cup fruit (or 5/8 cup)
- Banana = ½ cup fruit
- Dried fruit credits as 2x the volume served, so ¼ cup raisins = ½ cup fruit

However, some fruits and vegetables may be difficult to measure using a spoodle or other measuring utensil. In these cases, it can be helpful to use the FBG. Below is an example:

- The Food Buying Guide tells us that 1 pound of grapes with stems provides 10.5- ¼ cups of fruit. If we divide 10.5 by 4, this give us the total number of cups, so 1 pound (or 16 oz) = 2.625 cups. From this, you can determine the weight of 1 serving, we'll use ½ cup for this example.

$$\begin{array}{r} 16 \text{ oz} \\ \hline 2.625 \text{ cups} \end{array} = \begin{array}{r} X \text{ oz} \\ \hline .5 \text{ cup} \end{array}$$

Cross multiply, so 16 oz x 0.5 cups = 8, then divide by 2.625 = 3.05 oz. This means that ½ cup of grapes would weigh 3.05 oz

Offer Versus Serve (OVS)

- Food service staff and cashiers were somewhat unclear about whether OVS was being implemented for lunch. Although all students observed at lunch took a reimbursable meal, it is important for staff to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) is available on our website (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf). The [Offer Versus Serve Guidance manual](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) is available on our website (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf). DPI SNT's [Training webpage](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) also has a webcast available, which outlines the OVS requirements for breakfast and lunch (https://dpi.wi.gov/school-nutrition/training/webcasts#ovs).

Findings and Corrective Action Needed: Meal Pattern

- ❑ **Finding #1:** Production records were incomplete and missing information, such as recipe and food item reference numbers, planned portion sizes for fruits and vegetables, planned number of portions, and planned portion size of and actual usage of condiments and salad bar options.
Corrective Action Needed: Submit one week of production records for lunch, which include the information listed above.
- ❑ **Finding #2:** Offer versus Serve training should be done with food service staff and point of service staff at Our Redeemer Lutheran School to ensure that reimbursable meals are offered and served. During meal observation it was noted that there was confusion among staff as to whether Offer versus Serve was being implemented for lunch or not. There is an [Offer versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) webcast on DPI's website that can be used for training (https://dpi.wi.gov/school-nutrition/training/webcasts#ovs).
Corrective Action Needed: Please submit a signed training roster confirming that staff at Our Redeemer Lutheran School completed Offer versus Serve training.
- ❑ **Finding #3:** Documentation provided for the week of review demonstrated a weekly grain shortage due to the required minimum amount of grains, 8.00 ounce equivalents (oz. eq.), not being met. The minimum grains for each day for the week of review are as follows:
 - Monday- Sausage pizza and hamburger 2.00 oz. eq.

- Tuesday- Soft shell tacos 1.25 oz. eq.
- Wednesday- Chicken nuggets 1.00 oz. eq.
- Thursday- Mini corn dogs and grilled cheese 2.00 oz. eq.
- Friday- PBJ & yogurt 1.00 oz. eq.

For additional information on meal pattern requirements, please visit the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Corrective Action Needed: Please submit a written statement explaining how you will meet the 8.00 ounce equivalent grain requirement for the week of review and your plan for ensuring the minimum grain requirement is met for future service weeks. Please include respective serving sizes and labels, if applicable.

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, and this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.
- 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.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a serving 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 “Ala 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

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

Joint Agreements

- Invoices for SFAs in joint agreements with another SFA should reflect the credit received for their commodity entitlement value. This may be done by decreasing the per meal cost by the per meal commodity value or credit to the monthly invoice.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, all revenues and expenses were put into NSLP, no revenues or expenses were recorded in nonprogram foods.

Corrective Action Needed: Please resubmit your 16-17 Annual Financial Report with the nonprogram food revenues and expenses broken out from National School Lunch and notify DPI when this is complete so the update may be verified.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- 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.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

- ❑ **Finding #1:** The Nonprogram Foods Revenue Tool had not been completed for the current school year, but tool was completed on site. The tool showed that the nonprogram food revenue ratio was not being met.

Corrective Action Needed: Please submit a plan as to how you will meet the nonprogram foods ratio by increasing nonprogram food revenue or contributing nonfederal funds.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) 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.

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 should 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 Complain Form](#) 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.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. Meal prices for paid, reduced, or free student meals visible on the computer screen that can be seen by students constitutes overt identification.

Findings and Corrective Action Needed: Civil Rights

- **Finding #1:** The shortened statement on the menu is not the correct statement.
Corrective Action Required: Please submit the January with the correct shortened statement, “This institution is an equal opportunity provider”.
- **Finding #2:** The notice of direct certification benefit letter does not contain the long nondiscrimination statement.
Corrective Action Required: Please submit an updated letter to include the current USDA long discrimination statement.
- **Finding #3:** Meal prices for paid student meals of \$3.10 and free student meals of \$00.00 are visible on the computer screen that can be seen by students, which constitutes overt identification.
Corrective Action Required: Please cover the price so it is not visible or contact your software provider to correct the issue.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

- Excellent Wellness Policy! Thank you for your attention to detail!

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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 became 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 [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage at (<http://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.
- All exempt and non-exempt fundraisers **must be documented**. Using DPI-provided tracking tools is a great way to ensure schools are meeting Smart Snacks regulations. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Findings and Corrective Action Needed: Smart Snacks

- **Finding #1:** There is a pop machine in the lunch room that is turned on during the school day and it is noncompliant.

Corrective Action Required: Please turn machine off between hours of 12:00 AM and one half hour after the end of school day, or stock it with grade appropriate compliant products which may sold any time throughout the day.

Professional Standards: New Food Service Director Hiring Requirements

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](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

Directors: 12 hours

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 and complete the designated training plan.
- **Finding #2:** Training is not being monitored on a tracking tool for food service staff.
Corrective Action Needed: Include all current training hours for each food service employee on a tracking tool and submit as corrective action.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

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>).

Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

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.

Findings and Corrective Action: Food Safety

- **Finding #1:** No employee reporting agreements on file at the SFA.
Corrective Action Needed: Please have all food service employees sign a reporting agreement and maintain on site.
- **Finding #2:** This SFA utilizes Time as a Public Health Control because it does not hold its TCS foods under mechanical refrigeration or mechanical heating, and no SOP is included in the food safety plan. With the use of this plan, all TCS foods must be discarded at the end of service no matter the length of time held outside of temperature control.
Corrective Action Needed: Please develop a SOPs for Time as a Public Health Control to reflect site-specific procedures. Submit updated process or [SOP](#) (<http://nfsmi.org/ResourceOverview.aspx?ID=75>) Open website then open up the complete manual in word format and find the Time as a Public Health Control SOP on page 63-64.

Buy American

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- 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](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

- 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>).

Findings and Corrective Action Needed: Buy American

- ❑ **Finding #1:** The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List, or SFA equivalent form, or did not have proper labeling to identify the country of origin:

- Canned Pears - Chile
- Canned Mandarin Oranges – China
- Canned Pineapple – Malaysia
- Canned Olives - Spain
- Cherry Tomatoes - Mexico

Corrective Action: The identified noncompliant food item(s) qualify to be on the non-compliant product list, but the SFA did not have a noncompliant list/process in place for tracking. The SFA began using a Noncompliant Product List for tracking nondomestic products today. Provide the completed list as corrective action. A [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

- **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 Our Redeemer Lutheran USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. Delavan-Darien 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:** No summer food service outreach was provided to students.

Corrective Action Needed: Please provide a statement that Our Redeemer Lutheran will notify students of the ability to receive free summer meals at Delavan-Darien 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.

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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!