

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

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**School Food Authority: St. Andrews School**

**Agency Code: 64-7364**

**School(s) Reviewed: St. Andrews School**

**Review Date(s): 12/14/17**

**Date of Exit Conference: 12/14/17**

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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. Andrews 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**

**Certification and Benefit Issuance**

## Commendations/Comments/Technical Assistance/Compliance Reminders

- Of those students eligible for free/reduced price meals in November, all were approved correctly  
Kudos for a job well done!

### **Free and Reduced Price Meal Applications**

- Since this school has a new determining official, it is highly recommended that the free and reduced webcasts be viewed on our [free and reduced](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications) web page (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>).
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- The benefit's issuance document should have the date that the student became eligible for benefits not the day the application was submitted.

### **Household Size Box**

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of non-duplicated names on the application for the application to be considered complete.

### **Incomplete Applications**

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

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

- Finding #1:** The applications had income annualized.  
**Corrective Action Needed:** Please provide a statement of understanding that going forward, all applications will not be converted to yearly unless more than one frequency of income is reported.
- Finding #2:** The Benefit's Issuance document did not have the actual approval date of the application listed.  
**Corrective Action Needed:** Please submit a statement of understanding that the BI list will contain the date the student was approved for benefits not the date the application was submitted.
- Finding #3:** The household size box on 1 application did not match the number of household names reported on the application.  
**Corrective Action Needed:** Please provide a statement of understanding that going forward, all applications will be checked to make sure names on application match household size box.

## Verification

## Commendations/Comments/Technical Assistance/Compliance Reminders

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- Only applications on file as of October 1 are subject to the verification pool.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

**Findings and Corrective Action Needed: Verification**

- ❑ **Finding #1:** No confirmation review was conducted on the applications that was chosen for verification.  
**Corrective Action Needed:** Please submit a statement of understanding to do a confirmation review for Verification going forward. Information on the [verification process](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) can be found on our website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).
- ❑ **Finding #2:** Only those applications selected for verification need to be signed by the verifying official.  
**Corrective Action Needed:** Please submit a statement of understanding to do a confirmation review for Verification going forward. Information on the [verification process](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) can be found on our website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).
- ❑ **Finding #3:** The application that was verified was not submitted as of October 1, 2017.  
**Corrective Action Needed:** Please submit a statement of understanding that only applications on file as of October 1, will be subject to verification.
- ❑ **Finding #4:** Section 5 on the VCR was completed incorrectly.  
**Corrective Action Needed:** Please watch the VCR webcast <https://dpi.wi.gov/school-nutrition/training/webcasts#verif> and please correct the 2017 Verification Collection Report (VCR) with correct information for section 5.

**Meal Counting and Claiming**

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

- 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 every school day (<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 St. Andrews 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 provide nutritious meals was very much recognized. From pre-portioning ketchup for chicken nuggets to cutting up cherry tomatoes so the students would be more likely to take them, we thank you for your time and dedication to your students. The nutrition professionals were positive, innovative, and worked well with the students. We enjoyed our time at St. Andrews 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 can be found on the [NSLP Meal Requirements and Nutrition Assessment](#) page of our website ([dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning](http://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 \(FBG\) for 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 manufacturer's 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](#) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>).
- Current nutrition facts labels, CN labels, and/or 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. CN labels and PFSs 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 and planned portion sizes for additional fruits, vegetables, salad bar, and condiments.
- 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**

- Since St. Andrews School is a joint receiving meals from another school district, St. Andrews School should work with the school district to receive updated standardized recipes with all of the required information. Because transport sheets are not used, the standardized recipes should include all of the information about the more than one ingredient meal items for the day. For example, a standardized recipe for the walking tacos should be on-site that includes the portion size and scoop number to be used for serving taco meat, the portion size of corn tortilla chips, and the portion sizes for extras such as shredded cheese, sour cream, lettuce, and salsa. Additionally, the crediting information for all of the walking tacos should be included on the standardized recipe. Therefore, St. Andrews School will know how this menu item credits towards the meal pattern.
- Standardized recipes are required for all menu items that have more than one ingredient. For example, the hamburger needs a standardized recipe because it has two ingredients, a beef patty and a bun. 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 the food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).
- 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.

### **Extras (Non-Creditable Food Items)**

- Extra, non-creditable items, such as cheese, bacon bits, chow mein noodles, cottage 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 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.
- 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. This can be done with a photo of what the serving size of ranch dressing looks like or putting out portion cups so students can squeeze dressing into the portion cups. Therefore, the intended serving size will be communicated to students and this would be the serving size accounted for in dietary specifications.
- 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.

**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, croutons, olives, bacon bits, chow mein noodles, cottage cheese, 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, cottage cheese 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.

**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 3/8 cup fruit. Therefore, if a student only takes one clementine, this is 3/8 cup. Two clementines need to be selected in order to obtain a full 1/2 cup portion. Consider including signage on the service line indicating that two clementines credit as 1/2 cup fruit.
- According to the FBG, a 1.6 ounce bag of baby carrots credits as 1/4 cup red/orange vegetable. Two 1.6 ounce bags of baby carrots must be selected in order to obtain a full 1/2 cup portion. Consider including signage on the service line indicating that two 1.6 ounce bags of baby carrots credit as a 1/2 cup vegetable.
- Portion sizes served must be full, level scoops in standardized measuring utensils. For example, grapes at the school are portioned into 4 fluid ounce cups. A full 1/2 cup of grapes must be included in the portion to be the required 1/2 cup fruit selected under Offer Versus Serve (OVS) if they do not select any other fruits or vegetables. 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 using grapes:
  - The Food Buying Guide tells us that 1 pound of grapes, without stems, provides 11.66- 1/4 cups of fruit. If we divide 11.66 by 4, this give us the total number of cups, so 1 pound (or 16 oz) = 2.915 cups. From this, you can determine the weight of 1 serving, we'll use 1/2 cup for this example.

$$\begin{array}{r} 16 \text{ oz} \\ \hline 2.915 \text{ cups} \end{array} = \begin{array}{r} X \text{ oz} \\ \hline .5 \text{ cup} \end{array}$$

Cross multiply, so 16 oz x 0.5 cups = 8, then divide by 2.915 = 2.75 oz. This means that 1/2 cup of grapes would weigh 2.75 oz

**Offer Versus Serve (OVS)**

- Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. Two non-reimbursable meals were observed during lunch. Another student was required to take milk before leaving the line when they already had a reimbursable meal of chicken nuggets, granola bar, and fruit. 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](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf)).

DPI SNT's [Training webpage](#) also has a webcast available, which outlines the OVS requirements for breakfast and lunch (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).

- For fruit and vegetables, such as the bagged carrots and clementines, that do not credit as the full ½ cup portion, consider creating a “cheat sheet” for the POS staff with crediting information.

### Training

- Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [training webpage](#) often for current and upcoming opportunities ([dpi.wi.gov/school-nutrition/training](https://dpi.wi.gov/school-nutrition/training)). Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website ([dpi.wi.gov/school-nutrition/directory](https://dpi.wi.gov/school-nutrition/directory)).
- DPI conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. Courses such as Meal Pattern: The Whole Enchilada and Offer versus Serve are recommended for lead workers and menu planners from each site. Information, including dates and locations, will be posted on the DPI training webpage.

### Findings and Corrective Action Needed: Meal Pattern

- ❑ **Finding #1:** Production records were incomplete and missing information, including recipe and food item reference numbers and planned portion sizes for additional fruits, vegetables, salad bar, and condiments.

**Corrective Action Needed:** Submit one week of production records for lunch, which include the information listed above.

- ❑ **Finding #2:** Two non-reimbursable meals were observed during lunch. The first non-reimbursable meal was chicken nuggets, granola bar, milk, and bagged carrots. The bagged carrots only credit as ¼ cup vegetable, therefore the ½ cup fruit and/or vegetable requirement was not met. Technical assistance was provided to POS staff during meal service and prior to the next meal service time. The second non-reimbursable meal was chicken nuggets, granola bar, and milk. The student went through the POS without a ½ cup fruit and/or vegetable, thus not meeting the ½ cup fruit and/or vegetable requirement. Another student was required to take milk before leaving the line when they already had a reimbursable meal of chicken nuggets, granola bar, and fruit. Offer versus Serve training should be completed with food service staff and point of service staff at St. Andrews School to ensure that reimbursable meals are offered and served. There is an [Offer versus Serve](#) 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 St. Andrews School completed Offer versus Serve training.

- ***Fiscal action will be assessed on these two non-reimbursable meals.***

- ❑ **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](#) 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](https://dpi.wi.gov/school-nutrition/national-SP23-2017-Unpaid-Meal-Charges-guidance-Q-A) may be found our [Financial Management](https://dpi.wi.gov/school-nutrition/national-Financial-Management) webpage ([https://dpi.wi.gov/school-nutrition/national-](https://dpi.wi.gov/school-nutrition/national-Financial-Management)



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.

### **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:** 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 provide a statement that the 17-18 Annual Financial Report will have nonprogram food revenues and expenses broken out from National School Lunch.
- ❑ **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**

- 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.

## **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](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:** The shortened statement on the menu is not the correct statement.

**Corrective Action Required:** Please submit the January menu with the correct shortened statement, “This institution is an equal opportunity provider”. Corrected on site, no further action required.

## 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 (1000)**

- 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](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) 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) (<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) (<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/) (<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
- 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 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>).

## Professional Standards:

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

- The Professional Standards regulations in 7 CFR 210.30 2015, 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.

### 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:** Training is not being monitored on a tracking tool for food service director or determining official.

**Corrective Action Needed:** Include all current training hours for each employee that performs food service activities 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](http://www.fns.usda.gov/ofs/food-safety-flashes)). The [Office of Food Safety](#) website ([www.fns.usda.gov/ofs/food-safety](http://www.fns.usda.gov/ofs/food-safety)) includes food safety resources.

### Food Safety Plans

- Food Safety inspections must be posted in a publically visible location.
- 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>)

### 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:** Food Safety inspection not posted in publically visible location.

**Corrective Action Needed:** Please move the food safety inspection outside of the doors into the cafeteria and take a picture of its location and submit as corrective action.

- **Finding #2:** No list of process 1, 2, or 3 items within your food safety plan.

**Corrective Action Needed:** Please submit a listing of all Process 1, 2, and 3 products used in the SFA.

- **Finding #3:** This SFA utilizes Time as a Public Health Control because it does not hold its cold TCS foods under mechanical refrigeration. 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 review the standard operating procedure for Time as a Temperature Control and submit required documentation that is used for Time as a Public Health Control.

### 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 Peached - Greece
- Canned Mandarin Oranges – China
- Canned Pineapple – Malaysia
- Canned Olives – Spain
- Frozen Broccoli – Mexico
- Grape 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 St. Andrews School, 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 you 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!*