

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

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**School Food Authority: St. Francis De Sales School**

**Agency Code: 64-7441**

**School(s) Reviewed: St. Francis De Sales School**

**Review Date(s): 1/25-26/18**

**Date of Exit Conference: 1/26/18**

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state 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](http://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](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at St. Francis De Sales for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. **All had extremely positive attitudes and were very receptive to recommendations and guidance!** In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

**REVIEW AREAS**

**1. MEAL ACCESS AND REIMBURSEMENT**

**Certification and Benefit Issuance**

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

**Free and Reduced Price Meal Applications**

- Applications must be signed and dated by the determining official at the time of approval.

- The application determination and income amount should be recorded on the back of the application with the determining official signature.
- An individual student's eligibility remains in effect for 30 school days into the new school year or until a new eligibility determination is made.
- 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).
- Households who are denied benefits must receive written notification of the denial. The notification must advise the household of:
  - Reason for denial of benefits;
  - Right to appeal;
  - Instructions on how to appeal; and
  - Ability to reapply for free and reduced price benefits at any time during the school year.

### **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.

### **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 names on the application for the application to be considered complete.

### **Direct Certification**

- SFAs are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- Households receiving direct certification benefits must be notified in writing of their benefit with the ability to deny the benefit.
- Free school meal benefits must be extended to all children who are members of a household in which one person in that household is receiving FoodShare, W-2 Cash Benefits, or FDPIR benefits.

### **Other Source Categorical**

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

### **Public Release**

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

## Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are be required to conduct a second review of applications in the following school year.
- St. Francis De Sales had a 25 percent certification error rate and will be required to conduct a second review of applications in the following school year. More information on this requirement is found in the Eligibility Manual. You will also receive a SNT memo in summer with more information.

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

- ❑ **Finding #1:** Applications were not signed or dated by the determining official, and no income or benefit determination was recorded on the application.  
**Corrective Action Needed:** Please watch the 3 free and reduced application webcasts located on our website: [Getting Started with Free and Reduced Price Meal Eligibility](#), [Processing Applications in Direct Certification](#), and [Special Situations in Free and Reduced](#). (https://media.dpi.wi.gov/school-nutrition/getting-started-free\_reduced-price-meal-eligibility/story.html, https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story\_html5.html, https://media.dpi.wi.gov/school-nutrition/special-situations-in-free-reduced/story.html). Provide a statement of understanding that going forward, all applications will contain all required approval information on the back of the application.
- ❑ **Finding #2:** 4 students from three household were given free benefits without application or direct certification documentation.  
**Corrective Action Needed:** Please notify these households of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be assessed for these errors for the review period (December) and month of on-site review (January).
- ❑ **Finding #3:** One student was approved as free eligible via income application but should have been denied as the income is over the threshold for free or reduced price meals.  
**Corrective Action Needed:** Please notify this households of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be assessed for these errors for the review period (December) and month of on-site review (January).
- ❑ **Finding #4:** Direct Certification (DC) had only been run once for the 17-18 school year on December 6, 2017, but should have been run at the start of school.  
**Corrective Action Needed:** Please provide a statement of understanding that DC must be ran before or close to the beginning of each new school year.
- ❑ **Finding #5:** Households of those directly certified (DC) to receive benefits were not notified in writing of the benefit and their ability to decline benefits.  
**Corrective Action Needed:** Please provide a statement of understanding that DC eligible households will be notified in writing with the ability to decline benefits.
- ❑ **Finding #6:** Households who are denied benefits are notified by phone.  
**Corrective Action Needed:** Please provide a statement of understanding that all denied applicants will be notified in writing of the denial with appeal rights.
- ❑ **Finding #7:** The Public Release was not submitted to a local newspaper or distributed to local grassroots organizations (public libraries, food pantry, churches, etc.) and unemployment offices.  
**Corrective Action Needed:** Please submit a statement of the process to use for school year 2018-19 to include the appropriate places/agencies when distributing the Public Release.

## 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.
- 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:** Verification was conducted incorrectly because the categorically eligible applications were not included in the sample pool.  
**Corrective Action Needed:** Please watch the [verification webcast](#) and resubmit the Verification Collection Report ([https://media.dpi.wi.gov/school-nutrition/verification/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html)). Information on the [verification process](#) can be found on our website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).
- ❑ **Finding #2:** No Confirmation Review was conducted on the application selected for Verification, and the Verifying official did not sign the verified application.  
**Corrective Action Needed:** Please submit a statement of understanding to do a confirmation review for Verification going forward. Information on the [verification process](#) can be found on our website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).

## Meal Counting and Claiming

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

- Per your online contract, checking off the students at the beginning of the line before they receive their meal, is considered an alternate point of service (POS). When this type of POS is utilized, there must be an adult at the end of the line who is able to determine if a reimbursable meal is taken.
- Reimbursable meals must be offered to all students each day school is in session a full day.
- DPI has created [Field Trip meal resources](#) to help schools offer student meals every school day <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals for claim submission.

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

- ❑ **Finding #1:** SFA utilizes an “alternate” point of service with the adult at the beginning of the line checking off students and student volunteers serve the meals. Because the beginning of the line is very close to the end of the line, the students who have selected a reimbursable meal are visible to the person checking off names and the students receive pre-packed meals, thus fiscal recalculation is not required.

**Corrective Action Needed:** Please move point of service to the end of the line after a reimbursable is selected. Please update your online contract, on Schedule A, with this change in point of service, and let me know when this is complete.

- ❑ **Finding #2:** Pizza Hut pizza is sold to students once a month instead of the reimbursable meal which is not allowed per USDA regulation because a reimbursable meal must be offered every day that school is in session.

**Corrective Action Needed:** If the pizza served during meal service was Smart Snack compliant, it could be sold during lunch time, but reimbursable meals would still need to be offered.

- ❑ **Finding #3:** Edit checks are not completed monthly and used in claim submission.

**Corrective Action Needed:** Please submit the completed edit check for the month of January that is used for claim submission. If your software does not provide monthly edit checks, a [manual edit check form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc) is located on our website at (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc>).

- ❑ **Finding #4:** Claims have not been submitted for the 17-18 school year.

**Corrective Action Needed:** Please submit completed claim excel templates for September thru November claims, via email attachment to Jacque Jordee at [Jacqueline.jordee@dpi.wi.gov](mailto:Jacqueline.jordee@dpi.wi.gov). 608-267-9134.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

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

- Sincere thanks to the staff at St. Francis De Sales School District. We appreciate your time and efforts spent participating in the on-site review. You all make a positive difference in the lives of your students, and we appreciate that!

#### **Meal Pattern Responsibility with a Joint Agreement**

- Although you are purchasing meals through a joint agreement, it is ultimately your responsibility, as the School Food Authority's (SFA), to ensure all meal pattern requirements are met. This includes an understanding of the requirements of the meal pattern and keeping on file, at your site, any documentation (e.g., crediting documentation and recipes) needed to ensure that meals delivered are compliant with the meal requirements.
- Information on meal pattern requirements can be found on the [NSLP Meal Requirements and Nutrition Assessment](http://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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning)).

#### **Crediting**

- Acceptable crediting documentation was not available for the products listed below. Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting. Work with your vendor, Lake Geneva-Genoa to gather crediting information for your site for these products. 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>).
  - Grecian Delight Roasted Red Pepper Hummus. This product is not on their K12 approved list and therefore a PFS was not available. PFS provided by FSD did not match with the product they are offering. It is important that the product offered to students matches the product label on file at the school.
- Coleslaw. No PFS is available from the manufacturer. Therefore reviewer unable to determine crediting for the meal pattern. Discontinue use or offer as an extra. Note: if offered as an extra, the product still needs to be considered in the meal pattern dietary specifications.

- 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).
- 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. Documentation can be stored as hard copies or electronically. 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 at St. Francis De Sales School.
  - 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.”*
  - Please work with Lake Geneva-Genoa School District to obtain required documentation and keep these files on site.
- 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

### **Crediting Using the Food Buying Guide**

- Items that are not processed prior to purchase, such as raw meats, beans, eggs, fruits, vegetables, and milk, can be credited using the USDA [Food Buying Guide](#) (FBG). The FBG contains yield and crediting information for foods with standards of identity, such as those listed above. Foods that do not have standards of identity are not listed in the FBG and require further documentation.
- For more information on how to use the FBG, please see DPI SNT's [Food Buying Guide PDF](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/small-victories-food-buying-guide-presentation.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/small-victories-food-buying-guide-presentation.pdf).

### **Meal Pattern/Menu Planning Worksheets**

- Menus must be planned to meet meal pattern requirements. Menu planning worksheets are very helpful tools for ensuring meal pattern requirements are met at lunch (particularly vegetable subgroup requirements). Use the [K-8 School](#) (Lunch) template, which contains all the basic information needed to plan compliant menus for the selected age/grade group. You may also access them electronically on the [Menu Planning](#) webpage, under the Menu Planning Tools heading. [Instructions](#) for how to complete the worksheet are also found on the same webpage. (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

### **Standardized Recipes**

- A few recipes used during the review week were lacking pieces of information necessary for standardized recipes. Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly meal pattern requirements. Technical assistance was given to include age/grade groups, recipe instructions, pans used, weight and/or volume



measurements, equipment used, and serving utensils for proper portioning of the menu item. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen.

- In addition, the Tomato Soup and Mashed Potatoes did not have standardized recipes. Kitchen staff use the instructions on the product label. This is unacceptable as the standardized recipe must be tailored to the food service operation.
- Guidance on what a standardized recipe should include can be found on our [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>) or [contact a Public Health Nutritionist](https://dpi.wi.gov/school-nutrition/directory) for assistance (<https://dpi.wi.gov/school-nutrition/directory>).
- Update the following standardized recipes:
  - Turkey & Gravy (12/13) - cooked chicken is added, but not listed in the ingredients. Additionally, there are no instructions for how to prepare the dish. Update the standardized recipe with this information.
  - Ham and Cheese (12/14) - the crediting and gram weight are incorrect for the bun.
  - Toasted Cheese (12/15) - two different recipes were sent prior to the on-site review. However, upon discussion with the Food Service Director, they are only using one of the recipes. Discard the recipe that is not being used, and update the recipe for the Toasted Cheese sandwich with the missing pieces of information as mentioned above.
- Create standardized recipe for:
  - Mashed Potatoes (12/13)
  - Tomato Soup (12/15)

### Signage

- The National School Lunch Program regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at lunch. It is required to post signage visible to the students that indicates the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination of fruit and vegetable.
- Signage was not posted at lunch to show students what constitutes a reimbursable meal. Technical Assistance was given, and a lunch menu and a DPI “Build a Healthy Lunch” poster was printed and posted at the beginning of the service line.
- If you wish to print larger signs or edit another one of our templates, visit our [Signage Resources](#) webpage. You may also order signage from the School Nutrition Team by visiting the [Team Nutrition](#) webpage and complete the Resource Order Form ([dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage); [dpi.wi.gov/team-nutrition](https://dpi.wi.gov/team-nutrition)).

### Transport Sheets

- Transport sheets are intended to be useful tools to record required information to document that food meeting the meal pattern was served appropriately. There was some missing information on the transport sheets provided prior to the on-site review. For lunch, transport sheets need the following information:
  - Age/grade group, milk amounts, meals ordered and served for both students and adults (it was not clear what the numbers on the transport sheets represented), and temperatures when carts are loaded at production kitchen, on arrival to satellite kitchen and at meal service (some transport sheets provided for the week of review did contain the temperature information and some did not).
- It is not required that you use a specific transport sheet template, but it is recommended that you use the DPI [Transport sheet template](#), which contains space to enter all of the required information. These templates are found on our [Production Records](#) webpage

(<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

### **CACFP**

- 4k students at St. Francis De Sales School come down to the cafeteria at the same time and place as the 5th graders. Due to this, these students are considered comingled and therefore the school has the flexibility to continue to offer the K-8 meal pattern.
- If in the future, this were to change, and the 4k students do not get their lunch at the same time and place as other grades groups, then these students would need to follow the updated Child and Adult Care Food Program (CACFP) meal pattern that was implemented on October 1, 2017. This replaces the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

### **Training**

- It is recommended that anyone involved with the school meals program attend DPI training classes. Classes are offered in the summer and selected other times throughout the year. Numerous webcast training sessions are also available online. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the USDA requirements for the federal nutrition programs including verification, free/reduced applications, menu planning, production records, and record keeping requirements. Information on summer classes will be sent to School Food Authorities in late spring and is also available on the [DPI training](https://dpi.wi.gov/school-nutrition/training) webpage ([dpi.wi.gov/school-nutrition/training](https://dpi.wi.gov/school-nutrition/training)).

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

*Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.*

❑ **Finding #1:** Thursday 12/14 of the week of review, the coleslaw was unable to be credited. No PFS was available. This is considered a daily vegetable shortage because the only other vegetable offered were the sweet potato fries (only offered 1/2 cup to students). 3/4 cup is the daily minimum. This is not a repeat finding for this administrative review, however, repeat violations during subsequent Administrative Reviews will result in fiscal action.

**Corrective Action Needed:** Work with your vendor, Lake Geneva-Genoa UHS, to correct this daily vegetable shortage. A different coleslaw product with a valid PFS may be used, discontinue the use of the product or you may count as an extra and not count the product towards the meal pattern. Work with Lake Geneva-Genoa to write a statement that details your plan and submit a valid PFS if you choose to continue to offer coleslaw. Indicate how you will ensure that students are offered 3/4 cup vegetable daily.

❑ **Finding #2:** Inadequate crediting documentation for the Hummus resulted in insufficient weekly subgroup quantity offered. Considered insufficient quantity and not missing vegetable subgroup because Hummus was offered to students, but unable to credit to do inadequate crediting



documentation. This is not a repeat finding for this administrative review, however, repeat violations during subsequent Administrative Reviews will result in fiscal action.

**Corrective Action Needed:** Work with your vendor, Lake Geneva-Genoa UHS, to correct this insufficient weekly subgroup quantity. Work with Lake Geneva-Genoa to choose a different hummus product with a valid PFS to determine crediting, or discontinue the use of the product or you may count as an extra and not count the product towards the meal pattern. Work with Lake Geneva-Genoa to create a statement that details your plan and submit a valid PFS if you choose to continue to offer hummus. In addition, complete and submit a menu planning worksheet for the week of review (information on menu planning worksheets detailed above).

❑ **Finding #3:** The following standardized recipes were missing pieces of critical information, including: age/grade groups, recipe instructions, pans used, weight and/or volume measurements, equipment used, and serving utensils for proper portioning of the menu item. Work with your vendor, Lake Geneva-Genoa UHS, to correct these standardized recipes. Submit copies to the Public Health Nutritionist and keep copies on file at your site.

**Corrective Action Needed:**

- Update and submit the following standardized recipes:
  - Turkey & Gravy (12/13)
  - Ham and Cheese (12/14)
  - Toasted Cheese (12/15)
- Create and submit standardized recipes for:
  - Mashed Potatoes (12/13)
  - Tomato Soup (12/15)

❑ **Finding #4:** Signage was not posted at lunch to show students what constitutes a reimbursable meal.

**Corrective Action Needed:** Hang signage in the cafeteria explaining what a reimbursable meal is. *Corrected on-site. No further action required. Thank you!*

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

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

##### Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- 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 or the general fund 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.
  - 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 for 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/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>, <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

#### **Unpaid Meal Charge Policy**

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

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

- Finding #1:** Annual Financial Report does not have any revenues or expenses allocated to nonprogram foods and the SFA sells adult meals and cold lunch milk.  
**Corrective Action Needed:** Please provide a statement going forward that all [nonprogram food expenses and revenues](#) will be broken out from NSLP and allocated to the nonprogram foods line on the annual financial report (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).
- 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.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.

#### **4. GENERAL PROGRAM COMPLIANCE**

##### **Civil Rights**

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

##### **Civil Rights Training**

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

### Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

### 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

- 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)).
- 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.

### 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>).
- 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>).

### Findings and Corrective Action Needed:

- Finding #1:** Civil Rights training was not complete for all persons administering the food service program.  
**Corrective Action Required:** Please provide civil rights training for all employees administering child nutrition programs.
- Finding #2:** Civil Rights self-compliance form was not complete by October 31.  
**Corrective Action Required:** Please complete the [Civil Rights self-compliance form](#) and submit as corrective action (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).
- Finding #3:** The USDA Nondiscrimination Statement on the school materials and the menu are not the current USDA statements.  
**Corrective Action Required:** Please update all materials with the current USDA statement and submit the February menu with the correct shortened statement printed on it.

### Local Wellness Policy

## Commendations/Comments/Technical Assistance/Compliance Reminders

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.
- At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

### **Content of the Wellness Policy**

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

policy/toolkit).

### **Findings and Corrective Action Needed: Wellness Policy**

- **Finding #1: Your SFAs Local Wellness Policy does not contain language for all the minimum required elements stipulated above.**

**Corrective Action Required:** Language must be added related to identifying an official (or officials) responsible for oversight of the local wellness policy and specific measurable goals for the policy. Please provide a timeline for updating your policy to become compliant with the final rule. The [Local Wellness Policy Checklist](#) can assist with sample language

## **SMART SNACKS**

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

#### **Fundraisers**

- At St. Francis De Sales School, each class has a bake sale one day each month. No other food sales during the school day are available to students. The bake sale food items do not meet Smart Snacks standards and there was no documentation onsite for exempt fundraisers. The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization (or class) 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 fundraisers must be documented.
- Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no class has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. Templates, such as the [Exempt Fundraiser Tracking Tool](#), are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- If the school chooses to sell Smart Snacks compliant products, these foods or beverages may be sold at any time and in any location. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the [Smart Snacks calculator](#). You can our [Smart Snacks in a Nutshell](#) summary sheet and additional information on our [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

### **Findings and Corrective Action Needed: Smart Snacks**

- **Finding #1:** Each class has a bake sale for one day each month in the cafeteria. These food items do not meet Smart Snacks standards, nor is there any documentation for exempt fundraisers.

**Corrective Action Needed:** Submit a written statement with the following information:

- Who will be responsible for keeping track of exempt fundraisers?
- What tracking tool will you use? You may create your own, or use our [Exempt Fundraiser Tracking Tool](#) on our website.

- Where the fundraiser will be held. They may **not** be held in the cafeteria at the same time as meal service.

## Professional Standards

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

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

### **Professional Standards: Training Requirements**

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).

### **Annual Training Requirements for All Staff**

Directors: 12 hours

Managers: 10 hours

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

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

### Findings and Corrective Action: Professional Standards

- **Finding #1:** Training is not being monitored on a tracking tool for all employees responsible for administration of the food service program.  
**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

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

### **Time Temperature Control for Safety**

Milk and dairy products

Shell eggs

Meat (beef, pork, and lamb)

Poultry

Fish

Shellfish and crustaceans

Baked potatoes

Heat-treated plant food, such as cooked rice, beans, and vegetables

Tofu or other soy protein

Sprouts and seed sprouts

Sliced melons

Cut tomatoes

Cut leafy greens

Untreated garlic-and-oil mixtures

### **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 inspections were unavailable for review, thus the most recent was not posted in a publically visible location.

**Corrective Action Needed:** Please contact the sanitarian for copies of the food safety inspections and post the most recent food safety inspection outside of the doors into the cafeteria and take a picture of its location and submit as corrective action.

- **Finding #2:** This SFA utilizes Time as a Public Health Control because it does not hold its TCS foods under mechanical refrigeration or heat. 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 and submit a SOP for Time as a Public Health Control. The Institute of Child Nutrition has a template available for [time as a public health control](http://nfsmi.org/ResourceOverview.aspx?ID=75) (<http://nfsmi.org/ResourceOverview.aspx?ID=75>).
- **Finding #3:** Missing “employee reporting agreement” for all food handlers.
  - Corrective Action Needed:** Please have all food handlers sign an employee reporting agreement and submit copies as corrective action.

### 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-management-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-management-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>).
- If the SFA receives any nondomestic products, these products must be recorded on a [Noncompliant Product List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx). A template form is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).
- **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.

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



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