

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

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

**Agency Code:** 65-7443

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

**Review Date(s):** March 18-19, 2019

**Date of Exit Conference:** 3/19/19

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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. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, 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, or 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).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at St. Francis de Sales School for the courtesies extended to us during the on-site review and being available to answer questions and provide additional information. Everyone was very friendly, helpful, and receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions in SNACS as well as pulling records for the on-site portion of the review. The Administration Assistant's attention to detail and passion to make sure the program regulations are understood is evident by the great work you are doing within the program.

Thank you to the Administrative Assistant, Principal, and Food Service Manager for taking time out of the day to answer questions. The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet School Nutrition Program regulations.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The total number of eligibility determinations reviewed was 29. Of those determinations, there were 0 errors.

##### Carryover

Carryover of meal benefits from the prior school year is allowable until the 30<sup>th</sup> operating day in the school year unless a Free and Reduced Meal Application has been submitted (approved or denied) or the student was coded on Direct Certification for any code except an N code. In those cases, carryover stops when a new meal determination has been made.

##### Public Release

- All SFAs are required to distribute a Public Release before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available.
- SFAs must annually distribute the Public Release to *three* of the following places:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need such as laundromats, social service agencies, libraries, grocery stores, WIC offices, food pantries, senior centers, physician offices/clinics, Community Action Program Agencies)
  - 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. You may request the public release to be published as a public service.

##### Transferring Students

- When a child transfers in to the school midyear, the Determining Official (DO) can request documentation to support the child's benefit status from the former school or the household can provide it.
- Appropriate documentation would be a copy of the approved application or a copy of the Direct Certification output match file which shows the DC code he/she matched to.
- If you receive a copy of the approved application determined at the prior school, the Determining Official must re-determine the application, sign, and date it. A notification of eligibility letter must go out to the household notifying the benefit and start date of eligibility.
- The start date of eligibility is the date the DO re-determined the application.

##### Disclosure and Sharing Free/Reduced Eligibility Information

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.

- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, tuition, etc. Consent must be obtained each school year. Find the Sharing Information with Other Programs template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and kept on file. A template Disclosure of Free and Reduced Price Information form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).
- The household can “self-disclose” by bringing in a copy of their free/reduced approval notice or direct certification approval letter to the designated official operating the outside program. This option removes food service from these types of requests and is preferred. DPI recommends limiting the number of staff members responsible for collecting this data (e.g., one school secretary who has been trained on confidentiality, rather than each athletic coach).

### Verification

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- There was 1 application selected for Verification. It was selected correctly and verified correctly.
- The Verification process may begin October 1 and must be completed by November 15, annually.

### Meal Counting and Claiming

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- No errors were found on the monthly claim for reimbursement for the NSLP.
- When following the K-8 meal pattern, all students should be charged the same price since each student is allowed to take the same amount of food.

### Visiting Students

- School age students visiting for lunch, may take a reimbursable meal, be charged the student lunch price, and be claimed in the paid category. Keep documentation to support they took a reimbursable meal.
- If you prefer to charge the visiting student for the meal and not claim them, they do not have to take a reimbursable meal, but must be charged the adult meal price or at least charged enough to cover all costs for their items.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations and Appreciations

Thank you to all staff at St. Francis de Sales School for providing documentation prior to the onsite Administrative Review (AR). Thank you to the food service director for fixing documentation prior to coming onsite and for being open to technical assistance and willing to learn. The food service director shows a strong desire to understand and follow regulations, which is acknowledged and appreciated. Many fresh fruit and vegetable options are available daily and students were well behaved. Thank you for serving healthy meals to the students of St. Francis de Sales School!

## **Technical Assistance and Program Requirement Reminders**

### **Training**

The 2019 School Nutrition Skills Development Courses (SNSDC) dates and locations are:

- Appleton (Fox Valley Technical College): July 16-18, 2019
- Milwaukee (Alverno College): July 23-25, 2019
- Rice Lake (Wisconsin Indianhead Technical College): July 30-August 1, 2019
- Middleton (Kromrey Middle School): August 6-8, 2019
- Wausau (Northcentral Technical College): August 13-15, 2019

Registration and class schedules will be posted to the website in early May. Please visit the [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage for more information (<https://dpi.wi.gov/school-nutrition/training#up>).

### **Child and Adult Care Food Program (CACFP)**

#### ***Offer versus Serve (OVS) (CACFP)***

Children who are not yet in kindergarten must be served the CACFP meal pattern if not co-mingled with other students. Therefore, the Pre-K students at St. Francis de Sales School must follow the CACFP meal pattern. Offer Versus Serve (OVS) is not an appropriate service style for these students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing preferences. These students must be served all the required components in at least the minimum amounts. For more information, please visit 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>).

#### ***Grain-based desserts (CACFP)***

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include cookies, sweet piecrusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. The Rice Krispie and Oatmeal Bar served during the week of review are not creditable in the CACFP meal pattern for Pre-K students.

### **School Breakfast Program (SBP)**

Consider participating in the SBP, which will enable the SFA to help students start their school day with good nutrition and provide reimbursement for doing so. Breakfast can be a simple, grab n' go set up with minimal prep and service times. More information is available on the [School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program) webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>).

### **Standardizes Recipes**

Technical assistance was provided onsite for the recipe standardization process. Recipe standardization ensures that each meal is planned to meet the daily and weekly meal pattern requirements. Continue to work towards recipe standardization and use all resources available to you. Great job to the food service director for fixing week of review recipes before the onsite review. Visit the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional tools (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

### **Alternate Protein Product (APP) Requirements**

In accordance with USDA's "[Alternate Protein Product Requirements.](#)" a CN label or product formulation statement (PFS) should have APP documentation attached that shows how the APP meets the regulation (<https://fns-prod.azureedge.net/sites/default/files/APPrequirements.pdf>). This includes:

1. Providing a statement that the APP meets the requirements found in Appendix A of 7 CFR 210, 220, 225, and 226.
2. Showing that the product has been processed so that some portion of the non-protein constituents has been removed.
3. Providing the Protein Digestibility Corrected Amino Acid Score (PDCAAS). The PDCAAS is required to be greater than 80% of casein and indicating how the PDCAAS was determined.
4. Showing that the protein level is at least 18% by weight when fully hydrated or formulated.
5. Providing the protein level of an APP on an "as-is" basis for the as purchased product. Protein is often provided on a moisture free basis (mfb) which is not the information FNS requires.

The Chicken Patty crediting documentation showed APP in the product, but did not have the attached APP documentation. Work with your distributor or the manufacturer to obtain this information. [APP Sample Documentation](#) is available on the [CN Labeling Food Manufacturers/Industry webpage](#) under Helpful Links (<https://www.fns.usda.gov/sites/default/files/APPsampledoc.pdf>, <https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>).

### **Crediting**

The [USDA Food Buying Guide for Child Nutrition Programs](#) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the FBG.

Most fruits and vegetables credit by volume served (e.g., ½ cup peaches, drained will credit ½ cup fruit) and the FBG will note if the crediting is different based on volume served (e.g., one medium banana credits ½ cup fruit). Most meat/meat alternates and grains credit by weight (i.e., 2.0 ounces of cooked, plain chicken breast credit 2.0 oz eq meat/meat alternate; 1.0 ounce brown rice credits 1.0 oz eq grain). If the product is not listed in the FBG, additional crediting documentation is required.

### **Whole Grain-Rich**

Foods that meet the whole grain-rich (WGR) criteria for the USDA School Meals Programs contain at least 50 percent whole grain. Grains that are not whole grain-rich cannot be credited toward the grain component. The following grain product are not WGR: Rice Krispies in the Rice Krispie Bar. The first ingredient in the Rice Krispie is corn and not whole corn. USDA has a [Whole Grain Resource](#) that provides tools and tips for identifying whole grain-rich products (<https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

### **Menu Planning Worksheets**

Menu planning worksheets are helpful tools to ensure meal pattern requirements are met at both breakfast and lunch. These can be found on the [NSLP Menu Planning](#) webpage, under the Menu Planning Tools heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools>).

## Meal Patterns

The incorrect meal patterns were followed during the week of review. Production records stated PK-4 and 5-8, which are not meal patterns under the NSLP. In addition to following the CACFP meal pattern for Pre-K students, the other meal patterns that must be followed include K-5 and 6-8, or K-8. It is recommended to follow Pre-K (CACFP meal pattern) and K-8 so that only two menus are planned for the week instead of three. This will reduce menu planning and recordkeeping burdens. The [lunch meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) and [CACFP meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) can help you menu plan (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>; [https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP\\_childmealpattern.pdf](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf)).

## Production Record

Production records are intended to be useful tools to record information prior to production, during production, and following production. During the week of review, planned/actual number of servings prepared, planned/actual quantity prepared (in purchase units), serving sizes for condiments, and serving sizes for menu items were not always filled out. Production record templates for breakfast and lunch can be found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Ranges for a serving size (e.g. ½ Chicken Patty on a Bun or whole Chicken Patty on a bun) are allowable on production records. However, the menu planner must understand the crediting of each serving size, and must ensure the daily minimum requirement for the full planned portion is still met. Students must be allowed to select the full portion if they want. It is recommended to ensure half portions still meet the full minimum quantity for a component to reduce OVS confusion at the POS. For example, a whole Chicken Patty on a Bun may credit 2.0 oz eq M/MA and 3.0 oz eq grain. This meets the daily minimum for a K-8 student and a 9-12 student. If cutting in half, the crediting is now 1.0 oz eq M/MA and 1.5 oz eq grain. This meets the daily minimums for a K-8 student, but does not meet the daily minimums for a 9-12 student.

## Sodium

Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, olives, and processed food items. Use of these products should be closely monitored and limited to meet sodium requirements. The taco seasoning used during the week of review contained 9,465.9 mg sodium per 3.5 ounces. The total recommended daily amount of sodium for a child is no more than 2,300 mg. Great job to the food service director for already procuring a new, low-sodium taco seasoning.

## Trans Fat

Foods and ingredients used to prepare school meals must contain zero grams of trans fat per serving (less than 0.5 grams per serving) according to each product's nutrition facts label or manufacturer's specifications. If it is likely that a product's trans fat is naturally occurring (for example, in some meat and dairy products), the SFA must request documentation from the manufacturer that reports the source of the trans fat prior to using the product. If a label does not specify the trans fat content of a product, the SFA must request additional information prior to serving the product. All products containing synthetic trans fats must be discontinued immediately.

## Exhibit A

[Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1.0 oz eq for each specific group (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). Exhibit A groups all grain

products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:

- Group A: these products are hard and crunchy, dry and lightweight. Per ounce, they contain a good deal of grain.
- Group B: whether serving bagels, pizza crusts or tortillas, 1.0 ounce of these products all credit 1.0 oz eq grain.
- Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1.0 ounce of pancake does not credit as 1.0 oz eq like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz eq grain.

Exhibit A can be used to credit any of the products that appear in the table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

### **In-house Yield**

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the SFAs next AR. An in-house yield study may be warranted if your food service operation consistently gets higher or lower yields from a product than what is specified in the FBG. Additionally, an in-house yield study may be used for food items or sizes that are not currently listed in the FBG (e.g. 175 count apples). [In-house Yield Study Procedures](#) are available on the [Menu Planning](#) website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

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

- ❑ **Finding #1:** OVS is an unallowable meal service under the CACFP meal pattern.

**Corrective Action Required:** Please submit a statement explaining what will be done to the meal service so that Pre-K students following the CACFP meal pattern will be served one of every menu item planned.

- ❑ **Finding #2:** Trans Fat is an unallowable dietary specification in foods served in school meals. The margarine/butter blend used during the week of review contains 1.6 g Trans Fat.

**Corrective Action Required:** Submit a nutrition facts label for a new margarine/butter blend that contains 0 g trans fat.

- ❑ **Finding #3:** The meal pattern requirements for the lunch week of review were not met. The following shortages occurred:
  - Daily fruit shortage:
    - Monday-Friday, February 25, 2019-March 1, 2019. Only ¼ cup was offered to students daily.
  - Daily vegetable shortage:

- Tuesday, February 26, 2019 only tater tots were offered to students. A full 8 tater tots credits  $\frac{1}{2}$  cup of vegetable, which were offered to 5-8 students. Only 5 or 6 tater tots ( $\frac{1}{4}$  cup and  $\frac{3}{8}$  cup respectively) were offered to PK-4 grade. The  $\frac{1}{4}$  cup meets the requirement for Pre-K, but a full  $\frac{3}{4}$  cup must be offered to grades K-8.
- Daily grain shortage:
  - Friday, March 1, 2019 with the hard shell corn tortillas. Two shells credit 0.5 oz eq grain, which is short the 1.0 oz eq grain minimum for K-8.

**Corrective Action Required:** Submit a statement explaining how the daily fruit shortage, daily vegetable shortage, and daily grain shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation. **The Food Service Director stated onsite that they will start offering  $\frac{1}{2}$  cup fruit daily to students, they will add  $\frac{1}{4}$  cup of mixed veggies to Tuesday’s menu and offer the full 8 tater tots ( $\frac{1}{2}$  c vegetable), and discontinue using the hard shell tacos and only use the soft shell tacos (2 = 2.0 oz eq grain). Corrective action complete onsite, no further action required.**

□ **Finding #4:** Production records are not filled out thoroughly and consistently. Planned number of servings prepared and planned/actual quantity prepared in purchase units must be filled out daily. Production records must also differentiate the appropriate serving sizes per meal pattern (e.g. Pre-K serving sizes and K-8 serving sizes). A sample production record with these separated out was provided to the food service director during the onsite review.

**Corrective Action Required:** Send one week of completed production records with all columns filled out thoroughly and consistently (including planned number of servings for each menu item and planned/actual quantity prepared in purchase units for each menu item). This week of production records should also have separate planned serving sizes for Pre-K and planned serving sizes for K-8. Choose a week that occurs after the completion of this AR, but before the corrective action due date.

### 3. RESOURCE MANAGEMENT

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

##### Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The Annual Financial Report instructions are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- Refer to the webcast explaining the Annual Financial Report ([https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story_html5.html)).
- Any nonprogram foods such as adult meals, extra entrées, or milk sold to students that is not being claimed for reimbursement, must be recorded as a Nonprogram Food revenue on the Annual Financial Report. You also need to calculate the expenditures related to these nonprogram foods so it can be documented on the Annual Financial Report.



- 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” (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc>).
  - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
  - Under “Purchased Services” report any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “nonprogram foods”, report 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, a la carte, and caterings would also be included here.
  - When revenues are recorded from the federal reimbursement payments, 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 an NSLP food expenditure for private schools and a purchased service for public schools.

#### Allowable Costs

- Bad debt from unpaid student lunch accounts 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 our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

#### Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs 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>
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter
  - Sample robo-call script

#### Refunds

- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning unclaimed property that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

## Revenue from Nonprogram Foods

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, Extra Milk (for cold lunch or a second milk at lunch), and Extra Entrées.
- If students that have already purchased a reimbursable meal would like to take extra fruit and vegetables, you do not need to charge them for these. However, if you see an excessive amount of these items being taken, you could potentially be losing money and should charge for extras.
- Giving away extra entrées or sides (not fruit or vegetables) is unallowable.
- If you want to allow the students to take extra entrées, or any extra sides, they must be charged. You can calculate the raw food cost for these items and plug them into the [DPI Nonprogram Food Price Calculator Tool](#) to determine what you should price them out as. The [Menu Raw Food Costing Tool](#) can be used to price out a week's worth of entrées to get the raw food cost. Plug the average raw food cost from this tool into the DPI Nonprogram Food Price Calculator Tool.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- The USDA Nonprogram Revenue Tool (the formula shown below) must be completed annually, at a minimum, to ensure all costs of Nonprogram foods are being covered. Using the Child Nutrition Report from Online Services, you can retrieve this data and complete this calculation to ensure you are covering all costs of nonprogram foods.

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

### Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, at a minimum, SFAs must follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- The SFA is charging an adequate amount for the adult meals.

### Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

### Indirect Costs

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they

pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.

- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
  - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
  - Utility charges - separately metered or current usage study by the local utility company.
  - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
  - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
  - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the SFA's total.

### **Findings and Corrective Action Needed: Resource Management**

- **Finding #1:** Indirect costs are charged to the nonprofit school food service account for janitorial services, trash collection, and utilities. Without a time study, these are unallowable costs to the food service account.

**Corrective Action Required:** Cease charging the nonprofit school food service account for these expenses until a time study is completed for janitorial services, trash bag study is completed for food service out of the entire school, and utilities for the kitchen has been metered. Submit a statement of what the plan moving forward is to ensure only allowable costs are charged to the nonprofit school food service account.

- **Finding #2:** Food made for lunch service is given away for free at other events and this is an unallowable cost to food service. For example, rice krispie bars were made in excess and given away at a school event.

**Corrective Action Required:** If food is going to be made for events, it must be paid for by another fund. The food cost, labor, and any other costs incurred must be covered by another fund and transferred into the nonprofit school food service account. Otherwise, the food made for the events must be sold and the price determined must cover all costs incurred to make the product. Submit a statement of what the plan is moving forward to ensure food service isn't paying for any food outside of the lunch program.

## **4. GENERAL PROGRAM COMPLIANCE**

### **Civil Rights**

#### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

- The And Justice For All poster was posted in a publicly visible location at the review site.

#### **Civil Rights Training**

- All staff involved with the National School Lunch Program have completed the Civil Rights training, annually.

### Civil Rights Self-Compliance Form

- The Civil Rights Self-Evaluation Compliance form was completed by October 31. This was done correctly by the SFA.

### Special Dietary Needs

- If accommodating students with allergies by having a specific table to sit at, it is advised to not label it “peanut free” or “allergen free”. Instead, label it “allergen aware” or “peanut aware” as you may not be able to guarantee the table(s) are free from any allergens at all times of the day. The school is recognized as “peanut free”. Consider referring to the school as “peanut aware” instead.
- The school(s) should have special procedures for 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. SFAs may use the prototype Medical Statement for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement 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>). This flow chart gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on fluid milk substitutes, please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

### Local Wellness Policy

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The SFA has a Local Wellness Policy in place that could use an update to include all of the requirements. Technical assistance was provided on-site. Consider using the Wellness Policy Builder to create a new Local Wellness Policy

(<https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1>).

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 2016-17 with full compliance 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 the SFA 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](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). 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).

### **Resources:**

- 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)).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- 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>).

## Findings and Corrective Action Needed: Local Wellness Policy

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

**Corrective Action Required:** Update the Local Wellness Policy to include everything listed above which is also listed in the Local Wellness Policy Checklist. **Provide a date of when you plan to have the policy updated and compliant with the final rule.** The Wellness Policy Builder can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy.

### Smart Snacks in Schools

N/A - no food or beverages sales with students during the school day.

### Buy American

#### Commendations and Appreciations

Great job having documentation onsite with Buy American information for exempt products.

#### Technical Assistance and Program Requirement Reminders

The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, farmers, and provides healthy choices for children in the USDA School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed by, manufactured by, or packed in, the U.S, but the country of origin is not listed, this product requires additional information from the distributor on where the product is originally from.

More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT Procurement webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### Professional Standards

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

##### Professional Standards: New Food Service Director Hiring Requirements

- The hiring standards for SFA directors are based on the size of the 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, substitute, 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](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- USDA allows a flexibility to complete the total training

### 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
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

### Findings and Corrective Action Needed: Professional Standards

- ❑ **Finding #1:** Trainings are occurring but not being tracked on a spreadsheet.

**Corrective Action Needed:** Use the [DPI tracking tool](#) to track trainings. **Submit a copy of a completed tracking tool.**

### Food Safety and Storage

#### Technical Assistance

- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- Any food that is a TCS food must be kept under refrigeration, on ice, or hot held (depending on the food). If not, it must be discarded after meal service.

#### Time/Temperature Control for Safety (TCS) Food

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

Synthetic ingredients, such as textured soy protein in meat alternatives

### 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:** All staff working directly with the food need to sign off on the Employee Reporting Agreement.

**Corrective Action Required:** Submit signed copies of all staff involved with prepping or handling the food for the lunch program.

- Finding #2:** The Field Trip SOP was not in the Food Safety Manual.

**Corrective Action Required:** Using the DPI Field Trip SOP, edit it to be site specific and add it to your Food Safety Manual ([https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip\\_may2014.docx](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx)). Submit a statement to the consultant when this has been completed. **Corrected on-site. No further action required.**

- Finding #3:** Milk is removed from mechanical refrigeration and held in a milk crate on the line. The milk is not placed on ice or in a milk barrel.

**Corrective Action Required:** Discard any leftover milk in the milk crate, or change the flow of service to allow the students to grab a milk from the milk cooler first. Submit a statement in writing of what your plans are to ensure the milk stays refrigerated or kept cold using ice or ice packs.

### Reporting and Recordkeeping

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- Be sure to keep all documents pertaining to the School Nutrition Programs for 3 years plus the current school year. You may shred anything from the 14-15 SY and prior.



## Summer Food Service Program (SFSP) Outreach

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

St. Francis de Sales School gets provides information about the SFSP to their families. Spooner Area School District operates the SFSP and gives information to St. Francis.

### 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. Francis de Sales School, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

### Resources:

- 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>).
- For more information on Summer Feeding option contact:  
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator  
Phone: 608.266.7124; e-mail: [amy.kolano@dpi.wi.gov](mailto:amy.kolano@dpi.wi.gov)

"The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>)."



*With School Nutrition Programs!*