

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

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**School Food Authority: Peace Lutheran School**

**Agency Code: 667247**

**School Reviewed: (2275) Peace Lutheran School**

**Review Date: 01/10/19**

**Date of Exit Conference: 01/10/19**

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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).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Peace Lutheran School. Staff were available to answer questions and receptive to recommendations and guidance both offsite and onsite. The Authorized Representative and new food service director are knowledgeable and dedicated to the success of the program. The new food service director has years of school nutrition experience, which has already contributed to increased program participation.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

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

- 23 eligibility determinations were reviewed, 1 error was identified. The agency will *not* need to conduct an independent review of applications during the 19-20 SY. Fiscal action will be calculated on this one error.
- Thank you for running direct certification during the required timeframes.

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

✓ **Finding #1:** One certification error (A) as indicated on the SFA-1 form.

**Corrective Action Needed:** Send a letter of adverse action to the household. A decrease in benefits must be provided with 10 *calendar* days to appeal prior to changing the benefit. Submit a copy of the SFA-1 form with the date of correction column completed. Include a copy of the letter sent to the household.

**Completed. No further action required.**

#### Verification

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

#### Error Prone Applications

The *Standard Sampling Method* is defined in the [USDA 2017 Eligibility Manual for School Meals \(EM\)](#) on page 101 as: a method by which the SFA selects three percent (3%) of all applications approved by the SFA for the school year, as of October 1, **selected from error prone applications**. Error prone means applications within \$100 per month or \$1,200 per year of [SY 2018-19 Income Eligibility Guidelines](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1819.pdf>).

**Example:** A household of four persons earns monthly between \$2,620 and \$2,820 (\$100 above or below the free and reduced dividing line of \$2,720); or \$3,770 to \$3,870 (\$100/month below the reduced maximum income number and up to the cut-off amount of \$3,870) would be considered an error prone income application during SY 2018-19.

Table 1 Maximum Monthly Income for Household of Four

FREE	REDUCED
-\$100 \$2720 +\$100	-\$100 \$3870 N/A
\$2620 ↔ \$2820	\$3770 ↔ \$3870

Error prone = Income within this range

Table 2 Maximum Annual Income for Household of Four

FREE	REDUCED
-\$1200 \$32,630 +1200	-\$1200 \$46,435 N/A
\$ 31,430 ↔ \$ 33,830	\$ 45,235 ↔ \$47,635

Error prone = Income within this range

Confirmation Review

The confirming official checks only the selected application(s) for accuracy before verifying official contacts the household(s). The confirming official signs and dates the application or the tracking tool.

VCR

The 18-19 SY VCR was updated to correct Section 3-3 by removing Medicaid *Reduced* (Z) codes.

**Meal Counting and Claiming**

- As a general rule, if kindergartners or pre-kindergartners have access to the National School Lunch Program on a particular day, then for that day they are to be included in both the Enrollment and the Average Daily Attendance (ADA) figures. For more information see [Appendix A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/site-based-claiming-manual-accessible-version.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/site-based-claiming-manual-accessible-version.pdf>) of the Online Claiming Manual.
- All meals claimed for reimbursement must be counted, recorded, consolidated, and reported through a system that *consistently* yields accurate claims. Meals must be claimed at the point of service where it can be determined that the student has all components required for a reimbursable meal. There must also be an accurate point of sale for a la carte, which include extra entrees and cold lunch milk.

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

- Finding #1:** Inaccurate point of sale. Lunches claimed are based on a forecast count and by backing out those that did not take a meal from the forecast. A la carte milks and entrees are counted in the same manner.

**Corrective Action Needed:** Correct the point of sale and retrain staff. Submit a statement explaining the new system along with a training roster of staff that attended.

**2. MEAL PATTERN AND NUTRITIONAL QUALITY**

**Commendations**

Thank you to the staff of Peace Lutheran School for their time, cooperation, and warm welcome during the Administrative Review. A special thanks to the new Kitchen Manager for providing documentation prior to the on-site visit and providing open and honest information regarding the food service operation.

The Kitchen Manager started her position with Peace Lutheran School a couple months before the Administrative Review. She came in with a positive attitude, identified areas of improvement for their National School Lunch Program meal service, and trained staff in order to better the compliance, food safety, and quality of the meals. From training the other school nutrition professionals on batch cooking and taking temperatures to training on Offer versus Serve and other areas to achieve program compliance, the Kitchen Manager has done an exceptional job in her short time at this school.

All of the school nutrition professionals work well together, have great rapport with the students, and do an excellent job of offering the components to students. Harvest of the Month and the Veggie Tales mural, promoting consumption of vegetables, are two highlights of nutrition education in the cafeteria.

There were no meal pattern findings during the week of review or the day of on-site observation. All meals observed were reimbursable. Thank you for your hard work and dedication to your Child Nutrition Program!

### **Technical Assistance**

#### *Production Records*

Lunch production records did not have the number of reimbursable and non-reimbursable (adult) meals planned and served for the week of review. This is one of the [Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) ("Must Haves and Nice to Haves") (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). Please ensure this information is filled in during future service weeks.

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

While all meals observed during lunch service were reimbursable, there were some issues with the point-of-service, as explained in the **Meal Counting and Claiming** section of this report. The Kitchen Manager said she would be more than willing to be the point-of-service, determining if meals are reimbursable and counting a la carte milk and entrees. Please ensure any school nutrition professionals that may take on this role during an absence are trained on OVS. If there is any change to who the point-of-service is, please ensure this/these person(s) are trained.

The Kitchen Manager requested additional OVS training resources. The [Offer Versus Serve Guidance Manual](#) and [Offer Versus Serve webcasts](#) (Offer versus Serve and Offer versus Serve - Meal or No Meal Lesson and Game) can be utilized (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).

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

While there were not any meal pattern errors, it is important to note the following information: Although you are purchasing meals through a joint agreement, it is ultimately Peace Lutheran School's responsibility to ensure all meal pattern requirements are met. Peace Lutheran School should have all required documentation available onsite, such as production records, transport sheets, standardized recipes, crediting documentation, etc. 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."*

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

❑ **Finding #1:** Peace Lutheran School is in a joint agreement with Hartford Joint #1 School District. Hartford Joint #1 School District prepares the meals, using standardized recipes, which are sent to Peace Lutheran School. Sometimes Peace Lutheran School prepares menu options using the recipes provided by Hartford Joint #1 School District.

Standardized recipes are required for all menu items that have more than one ingredient. There were not recipes available for teriyaki chicken bites and brown rice during the week of review. Even though there are instructions listed on the package, this recipe should be standardized to meet each food service operations' needs.

In addition, all standardized recipes must include detailed information about the specific ingredients, products, equipment, and procedures used to prepare the recipes. A standardized recipe produces a consistent quality and yield every time when the exact procedures, equipment, ingredients, and products are used, which is especially crucial for crediting recipes in School Meals Programs. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen.

The following recipes did not accurately reflect the products and procedures that were used in the production kitchen during the week of review: taco meat, beefy nachos, and Mexican street corn salad. There were additional recipes that did not always have the correct product numbers listed. Even though a product may be similar, the crediting of that product may be different, changing the intended crediting of the recipe and can potentially lead to not meeting daily and weekly meal pattern requirements.

**Corrective Action Needed:** Work with Hartford Joint #1 School District to obtain their standardized recipes for teriyaki chicken bites and brown rice and updated standardized recipes for taco meat, beefy nachos, and Mexican street corn salad. Submit these recipes to the Public Health Nutritionist.

### **3. RESOURCE MANAGEMENT**

#### **Nonprofit School Food Service Account**

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

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

The agency is required to separate nonprogram (extra milk, extra entrée, and adult meal) cost from program (NSL) cost and nonprogram revenue from program revenue. Although the agency is not exempt from completing the annual Nonprogram food revenue tool, [this resource](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>) and methodology can be used separate the cost and revenue of your nonprogram food items for the AFR.

###### Internal Controls

2 CFR 200.303 requires SFAs to establish and maintain effective internal control over the Federal funds they receive that provides reasonable assurance that they are in compliance with Federal statutes, regulations and the terms and conditions of the Federal award.

## Unpaid Meal Charges

[SP 46 2016](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) requires all SFAs to have in place a written and clearly communicated system to address meal charges. The policy must consist of a written document explaining how the SFA will handle situations where children eligible for reduced price or paid meals do not have money in their account or on hand to cover the cost of the meal at the time of service.

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

- ❑ **Finding #1:** Revenues and expenses are not separated by program. All revenue and expenses are reported under the NSLP.

**Corrective Action Needed:** Correct the 17-18 SY AFR to pull out the portion of revenue and cost of Nonprogram foods (extra milk, extra entrees, and adult meals) from the NSLP. Submit the paper adjustments to the consultant. Once reviewed, the DPI accountant will enter the corrected report into the online system.

- ❑ **Finding #2:** Inadequate internal controls for cash collection.

**Corrective Action Needed:** Submit a statement outlining how the cash collection process will be modified to ensure there is a separation in duties. For example, the same person should not be counting the cash, making the deposit and entering the deposit into the ledger.

## **Paid Lunch Equity (PLE)**

The agency is in compliance and utilized the 18-19 SY flexibility.

## **Revenue from Nonprogram Foods**

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

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

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

### 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, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) 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>).
- SFAs need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The 18-19 SY reimbursement rates should be used to determine adult prices for the 19-20 SY.

### Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- ❑ **Finding #1:** The Nonprogram Foods Revenue Tool has not been completed for the current school year. This is a requirement since the agency sells extra entrees in addition to adult meals and extra milk.

**Corrective Action Needed:** Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool for Peace Lutheran School using a 5-day reference period ([https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html)).

- ✓ **Finding #2:** The adult meal charge does not meet the minimum requirement. The current charge in the point of sales system is \$3.55. This conflicts with the online contract, which states \$3.65. The minimum requirement is \$3.60.

**Corrective Action Needed:** Increase the adult meal charge to a minimum of \$3.60.

**Corrected. No further action needed.**

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

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

##### Nondiscrimination Statement

When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 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 or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

##### Civil Rights Training

Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. The School Nutrition [PowerPoint](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>) presentation posted on the SNT Civil Rights website should be utilized.

### 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.

### Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) 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)).

### Findings and Corrective Action Needed: Civil Rights

❑ **Finding #1:** The confirming official and a part-time staff member did not complete civil rights training. **Corrective Action Required:** Review the School Nutrition [Civil Rights Training PowerPoint](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>). Sign off on the attendance record and/or submit the date of completion via email to the consultant. Retain records of completion and count the time towards annual Professional Standards training hours.

### Local Wellness Policy

#### Commendations/Comments/Technical Assistance (TA)/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 2016-17 with full compliance of the final rule by June 30, 2017.

### Content of the 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).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, a LWP minimum requirements checklist, and report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

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

❑ **Finding #1:** SFA LWP meets some but not all requirements as stipulated above.

**Corrective Action Required:** Please provide a timeline for updating your policy to become compliant with the final rule. The current policy is missing language related to:

- Public Involvement;
- Foods sold outside of school meal programs;
- Food and Beverage Marketing;
- Completion of a Triennial Assessment;
- And how the agency will update and inform the public on LWP changes

## **Smart Snacks in Schools**

### **Commendations:**

Peace Lutheran School is compliant with all Smart Snacks regulations.

### **Technical Assistance:**

#### *Final Rule*

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](#) webpage, including the [Smart Snacks in a Nutshell](#) handout (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf>).

#### *Fundraisers*

While Peace Lutheran School currently does not hold any food or beverage fundraisers during the school day, please note the following information if Peace Lutheran School would like to: The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. 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>).

The Smart Snacks standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

#### *Smart Snacks Calculator*

Using the [Alliance for a Healthier Generation's Smart Snacks Product Calculator](#) to assess product compliance is recommended (<https://foodplanner.healthiergeneration.org/calculator/>). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

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

No findings for the Smart Snacks section.

## **Professional Standards**

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

#### Training Requirements

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>).

## **Findings and Corrective Action: Professional Standards**

**Finding #1:** The confirming official and one part-time staff member have not met training hours for the current school year.

**Corrective Action Needed:** Provide a plan for meeting annual job-specific training hours. Both positions need training in job specific areas, which may or may not add up to a full 4 hrs. /year. Civil Rights Training must be completed annually and will count towards training hrs.

## **Water**

The agency is in compliance.

## **Food Safety and Storage**

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

#### **Temperatures**

All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

#### **Standard Operating Procedures (SOPs)**

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.

#### **Food Employee Reporting Agreements**

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

### **Findings and Corrective Action Needed: Food Safety**

✓ **Finding #1:** Inadequate record keeping. Missing and incomplete temperature logs for September, 2018-November, 2018. The agency has been maintaining adequate logs since December, 2018.

**Corrective Action Needed:** By signing off on this report, the agency agrees to maintain temperature logs in accordance with outlined SOPs. Temperature logs must be kept for a minimum of six months.

**Finding #2:** Missing Food Employee Reporting Agreements.

**Corrective Action Needed:** Complete all missing agreements. Submit copies of completed agreements as an attachment to assigned DPI Nutrition Program Consultant via email.

**Finding #3:** No annual food safety plan review completed.

**Corrective Action Needed:** Review entire food safety plan and update as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review page as an attachment to assigned DPI Nutrition Program Consultant via email.

## **Buy American**

### **Compliance Reminders:**

The USDA requires that a 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, to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

### **Technical Assistance:**

#### *Buy American Non-Compliant Product Forms/Attestation*

Hartford Joint #1 School District who Peace Lutheran School is in a joint agreement with uses the WI DPI Buy American Non-Compliant Product List template for items with countries of origin that are not the USA. Please work with Hartford Joint #1 School District to get copies of these forms. Keep track of the products that come in and ensure there is a [Buy American Non-Compliant Product List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) or [Buy American Attestation](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>).

#### *Non-Compliant Products Found Onsite*

The following products identified did not have proper labeling to identify the country of origin:

- Central Middle School - Hartford Joint #1 School District (production kitchen for Peace Lutheran School's meals)
  - Uncle Ben's brown rice- distributed by
  - Fortune cookie- distributed by
  - Nacho cheese sauce- packed in the USA
  - Hot sauce- made in the USA
  - Red raspberry vinaigrette- marketed by
  - Brown gravy- MN
  - Lime juice- packed
  - Pretzel roll- manufactured by
  - Raspberry rainbow yogurt- distributed by
- Peace Lutheran School
  - Mayo- made in the USA
  - French dressing- marketed by
  - Tomato soup- distributed by
  - Shredded cheese- distributed by
  - Butter- marketed by

According to USDA Memo SP 38-2017, any product that does not identify the country of origin requires certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products.

#### *Achieving Buy American Compliance*

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51 percent of its agricultural food component, by weight or volume, from the U.S." This can be accepted in an email.
- 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 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 prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are 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 the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (<https://dpi.wi.gov/school-nutrition/procurement/procurement-manual>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

#### **Findings and Corrective Action Needed for Buy American:**

No findings for the Buy American section.

#### **Reporting and Recordkeeping**

Refer to finding number one under food safety.

#### **Summer Food Service Program (SFSP) Outreach**

The agency is in compliance.

"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!*