

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

School Food Authority: St. Frances Cabrini School

Agency Code: 667446

School Reviewed: St. Frances Cabrini School

Review Date: 01/14/19-01/15/19

Date of Exit Conference: 1/15/19

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 St. Frances Cabrini School for making yourselves available to answer questions during the on-site visit and for being receptive to our recommendations. Overall, the program is operating well. Students are offered nutritious meals that are prepared in a clean and tidy space. The eating environment is also pleasant--students seem to have adequate time to socialize and enjoy their meal. Keep up the good work!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

30 eligibility determinations were reviewed, 17 errors were identified. Fiscal action will be applied to these errors. The agency would benefit from attending a summer training on the Free and Reduced application approval and verification process. Alternatively, you can access [SNT webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts#F) (https://dpi.wi.gov/school-nutrition/training/webcasts#F) online.

Independent Review of Applications

St. Frances Cabrini had a 56.67 % certification error rate from SFA-1. LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year. More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA.

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.
- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.
- If an SFA wishes to change the look or format of the [application for Free or Reduced-price school meals](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications) or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid

meal charges. As a reminder, **Wisconsin DPI requires source documentation of the student's previous eligibility.**

Disclosure

- The agency does not need to send out the *Sharing of Information with Other Programs* form with the free and reduced application packet, because currently, there are no local initiatives (e.g., athletic fee waivers, backpack program, etc.) in which parents would need to provide prior consent before their child's free and reduced status is shared. If this changes, parents must provide prior consent before a student's meal eligibility is shared.
- Any individual that is provided with individual student eligibility information for state/federal reporting purposes or local program fee waivers should complete the [Disclosure Agreement for School Staff](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement-school-staff.docx) and retain a copy on file at the district (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement-school-staff.docx).

Direct Certification

- As a reminder, you are required to complete a full enrollment direct certification run a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run .
- It was noted that the 11/9/19 run was not completed correctly. The output file listed B codes, which is an error code that means the birth dates are incorrectly formatted. Other error codes are F- incorrectly formatted or missing first name and L- incorrectly formatted or missing last name. When you see any of these codes, the input file must be corrected and re-run.

Findings and Corrective Action Needed: Certification and Benefit Issuance

✓ **Finding #1:** Certification and benefit issuance errors as indicated on the SFA-1 form.

Corrective Action Needed: Clarify and or obtain missing information to make the applications complete. If there is a decrease in eligibility status, 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.

□ **Finding #2:** High application determination error rate. The agency can benefit from additional training.

Corrective Action Needed: Watch the following webcasts. Submit the final quiz questions or the email confirming completion to the consultant.

- [Overview of Free and Reduced and Verification](https://media.dpi.wi.gov/community-nutrition/determining-eligibility-and-verification-overview/story_html5.html) (https://media.dpi.wi.gov/community-nutrition/determining-eligibility-and-verification-overview/story_html5.html)
- [Filling out the Household Application for Free and Reduced Price School Meals](https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story_html5.html).

Verification

Technical Assistance (TA)/Compliance Reminders

- The role of the confirming official is to check the original determination, but only for the application(s) selected for verification. This must be completed prior to reaching out to the household and requesting supporting income or assistance program records.
- The online contract was updated onsite to correct the positions of those in the verifying and confirming official roles.
- The 18-19 SY VCR was updated on-site to correct Section 3-2 and 5-8.

Findings and Corrective Action Needed: Verification

- ✓ **Finding #1:** Verification errors as indicated on the SFA-2 form. The verifying official did not correctly evaluate records originally submitted by the households. Records submitted are incomplete and ambiguous.

Corrective Action Needed: Follow-up with the households and obtain clarification/missing information necessary to complete verification. If the result of verification is a reduction in status, provide 10 calendar days adverse action to appeal.

Corrected. No further action required.

- **Finding #2:** The SFA over verified applications (2 vs. 1).

Corrective Action Needed: Submit a statement via email acknowledging that the agency will not over verify applications and understands the difference between the annual verification process and any applications “Verified for Cause” (done outside of the normal pool). More information on Verification for Cause can be found in the [Eligibility Manual for School Meals](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

- **Finding #3:** High error rate. The agency can benefit from additional training.

Corrective Action Needed: Watch the below webcast and submit the final quiz questions or email confirming completion to the consultant.

- [Verification](https://dpi.wi.gov/school-nutrition/training/webcasts#verif) (<https://dpi.wi.gov/school-nutrition/training/webcasts#verif>).

Meal Counting and Claiming

Edit Check

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc>

Computing the Attendance Factor (AF)

- 1) Divide the average daily attendance (ADA) for students by the school enrollment to obtain the attendance factor. The attendance factor is a percentage of students in attendance and is not the percentage of students participating in the school lunch program.
- 2) Calculate the “highest number of lunches expected for any day” by eligibility category (F/R/P).
 - a) Multiply the highest number of students in each category by the attendance factor.
- 3) Compare the “highest number of lunches expected for any day” to the daily counts recorded on the participation record for each of the eligibility categories.
- 4) Evaluate any daily lunch counts that exceed the “highest number of lunches expected”.

- 5) Documentation such as daily attendance records or check-off rosters may be used to support daily counts that exceed the “highest number of lunches expected”.
- Online contract updates were made onsite to correct the PLE tool and joint agreement.

Findings and Corrective Action Needed: Meal Counting and Claiming

No findings. The agency is in compliance.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

Thank you to the staff of St. Frances Cabrini School for their welcome, cooperation, and time during the Administrative Review. The Kitchen Manager and school nutrition professional work very well together and with the students. Their team work makes the lunch process from preparation through clean up run smoothly. The kitchen is extremely organized and tidy. In addition, there are many volunteers and teachers that help students get through the line, open lunch items, and clean up the tables to ensure each student has nice place to eat. Great work! There were no meal pattern findings during the week of review. Thank you for your hard work and dedication to your National School Lunch Program!

Technical Assistance:

Offer versus Serve (OVS)

While the Kitchen Manager/point-of-service has had OVS training in the past, an OVS refresher may be beneficial. 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 for training (<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>).

Fruit and Vegetable Signage

Certain types of fruits and vegetables on the fruit and vegetable bar are selected using tongs. If a portioning utensil cannot be used to serve certain fruits and vegetables, such as jicama sticks, signage can be utilized to let students know how many pieces, or jicama sticks in this example, they can select to have the full planned portion size of ¼ cup. Examples of this type of signage and printable signage can be found on DPI SNT’s [Signage](#) webpage under the Salad Bar Signage heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

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 St. Frances Cabrini School’s responsibility to ensure all meal pattern requirements are met. St. Frances Cabrini 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:** St. Frances Cabrini 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 St. Frances Cabrini School. Sometimes St. Frances Cabrini 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 and orange chicken and brown rice on the day of review. Even though there are instructions listed on the package, these 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 recipe for teriyaki chicken bites, orange chicken, 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.

❑ **Finding #2:** Signage was not posted at lunch to show students what makes up a reimbursable meal. Signage must be posted, and visible to students, that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve, they must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination. Signage examples can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Corrective Action Needed: Submit a picture of complete signage posted near the lunch service line.
Corrected onsite. No further action required.

❑ **Finding #3:** One non-reimbursable meal was observed at lunch because the student did not select a full ½ cup of fruit, vegetable, or combination. The student selected a few pieces of lettuce and brought an apple from home. In order for the meal to be reimbursable, the student needs ½ cup of fruit, vegetable, or combination. Foods brought from home cannot count toward the reimbursable meal requirements. Remember, raw leafy greens credit as half the volume served.

Corrective Action Needed: Submit a written statement detailing how this error will be corrected and avoided in the future.

Fiscal action will be assessed on this one non-reimbursable meal.

❑ **Finding #4:** One percent white milk and fat-free white milk were offered during lunch on the day of review. During the first meal service, the last seven students in line did not have access to one percent white milk. The only milk type they could choose was fat-free white. It is required that students are offered a minimum of two types of milk.

Corrective Action Needed: Submit a written statement detailing how this error will be corrected and avoided in the future.

Please note, repeat violations of a milk variety not being offered during subsequent Administrative Reviews may result in fiscal action.

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 and adult meal) cost from program (NSL) cost and nonprogram revenue from program revenue. [The Nonprogram Food Revenue Tool Exceptions methodology](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) can be used separate the cost and revenue of your nonprogram food items for the AFR.

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 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.

Paid Lunch Equity (PLE)

The agency is charging the minimum required student paid lunch price. Reviewer assisted the SFA in correcting the 18-19 SY PLE tool to reflect the correct weighted average price requirement. The corrected tool was uploaded to the 18-19 SY online contract.

Revenue from Nonprogram Foods

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

- Nonprogram foods may 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.

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

No findings. The agency is in compliance.

4. GENERAL PROGRAM COMPLIANCE

Technical Assistance (TA)/Compliance Reminders

Public Release

Next year, make sure you amend the DPI template to list only the programs the SFA operates. The Public Release was distributed stating the SFA participates in the School Breakfast Program and Special Milk Program, which is not the case.

Civil Rights

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) (<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. The SFA has a new Authorized Representative, who must complete Civil Rights training on an annual basis.

Special Dietary Needs

The SFA has a great process in place to ensure parents know how to inform the school of food allergies or intolerances. The SFA then outlines an emergency action plan and shares the plan with those that need to know. In addition, if a household would like to *request a meal modification for the NSLP*, DPI has a Medical

Statement that can be used to capture required information. Consider the following when processing all meal modification requests:

- 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 in order to claim the meal for reimbursement. 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

- 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).

Findings and Corrective Action Needed: Civil Rights

The agency is in compliance.

Local Wellness Policy

Technical Assistance (TA)/Compliance Reminders

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 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:

- 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: Provide a timeline for updating your policy to become compliant with the final rule. The current policy is missing language related to:

- Foods sold outside of school meal programs (Smart Snacks);
- 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

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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) 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

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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

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](https://foodplanner.healthiergeneration.org/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

Professional Standards: Food Service Director Hiring Requirements

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of 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>).

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>).**

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Full Time 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: Professional Standards

Finding #1: The SFA has not established a Food Service Director.

Corrective Action Needed: Submit a statement outlining who will serve as the Food Service Director. This individual must meet minimum hiring standards (if hired after July 1, 2015), which includes 8 hrs. of food safety training. This individual will also need to complete 12 hours of training per year.

*8 hrs. of food safety training can be met through a [food protection manager certification](http://datcp.wi.gov/Documents/cfmcoursedirectory.pdf) (<http://datcp.wi.gov/Documents/cfmcoursedirectory.pdf>) like ServSafe or Prometric. This type of certification was cited as missing on the most recent DATCP food safety inspection.

Finding #2: Staff are not tracking and have not completed the required training hours for the current school year and were unable to provide a training plan.

Corrective Action Needed: Provide a training plan for meeting the required training hours for the determining official/claim preparer, Authorized Representative, food service director and any staff working with the food service program.

Water

The agency is in compliance.

Food Safety and Storage

Technical Assistance/Compliance Reminders

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

Findings and Corrective Action Needed: Food Safety

Finding #1: 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 #2: 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.

Finding #3: Staff are not following *SOP #17 Holding Foods*, which states cold food like milk will be held at or below 41 degrees F and temperatures recorded in a log.

Corrective Action Needed: Re-train staff on SOP#17, or consider a different practice, like time as a public health control. If milk is reused, it must be recorded at or below 41 degrees Fahrenheit. Submit an attendance record showing the staff were re-trained. Work with your local sanitarian to decide on the best SOP for your operation. Either way, your implementation must align with your SOP.

Consider using the SNT SOP for use of insulated milk bags:

[Use of Milk Bags: Monitoring of Temperature Option](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-bag-temperature.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-bag-temperature.docx>)- Schools selecting this option may reuse milk if the temperature log shows that milk has been maintained at 41 degrees Fahrenheit or below when temperature of the bag is monitored. Frozen inserts must be used with milk bags.

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 St. Frances Cabrini 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 St. Frances Cabrini 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
- St. Frances Cabrini School
 - Pancake syrup- marketed by
 - Buttermilk ranch dressing- manufactured 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

The agency is in compliance.

Summer Food Service Program (SFSP) Outreach

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. 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>)

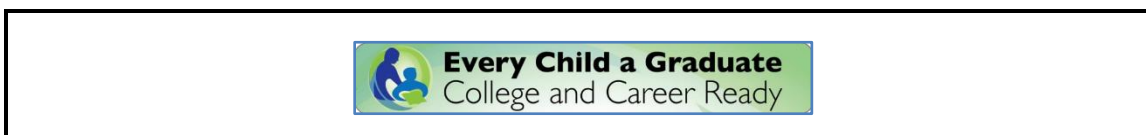
Resources:

- 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

“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!