

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

School Food Authority: St. Kilian School

Agency Code: 667612

School Reviewed: St. Kilian School

Review Date: 01/16/19-1/17/19

Date of Exit Conference: 01/17/19

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. Kilian 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 very 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. Posters in the café promote healthy choices that are consistent with the local wellness policy goals. This site is an ideal model for small schools in the National School Lunch Program. Your positive attitudes and energy are uplifting. Keep up the good work!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Technical Assistance (TA)/Compliance Reminders

12 eligibility determinations were reviewed, 1 error was identified. Fiscal action will be assessed on this error.

Independent Review of Applications (IROA)

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. St. Kilian School had a 8.33% certification error rate from the SFA-1. More information on the IROA is found in the [Eligibility Manual](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-application) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-application>). 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.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual. Using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf), look at the amount of their income under the column indicating the stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- A child or other household member's receipt of benefits from an Assistance Program automatically extends eligibility for free benefits to all children who are members of the household. [7 CFR 245.6(b)(7)] Foster child benefits do not extend to other students in a household.

Direct Certification

The first full run for direct certification should be completed at or near the beginning of the school year. Consider running DC for the full enrollment prior to the first operating day, but after July 1. This will reduce the number of households that need to apply via application and minimize unpaid meal charges for those not yet certified or on carryover benefits.

Findings and Corrective Action Needed: Certification and Benefit Issuance

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

Corrective Action Needed: Send a letter to the household notifying them of the increase in meal benefit. An increase must be made within 3 *calendar* days. Consider reimbursing the household for meals charged at the reduced rate. If reimbursed, the agency may amend prior NSLP claims. Submit a copy of the letter sent to the household and screen shot showing the change was implemented in the point of sale system. **Completed on 1/16/19. No further action required.**

Verification

Technical Assistance (TA)/Compliance Reminders

- The confirming official checks only the selected application(s) for accuracy before the verifying official contacts the household(s). The confirming official signs and dates the application or the tracking tool.
- The agency must complete verification activities no later than November 15 of each school year [7 CFR 245.6a (b) (1)].
- The [Verification Tracker Form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form-1819.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form-1819.docx) can be used to assist the agency in beginning and tracking the verification process. Include a copy of the application with this form.
- The verification process time period runs from around October 1 through November 15, with the Verification Collection Report (VCR) due on or before February 1.

Findings and Corrective Action Needed: Verification

□ **Finding #1:** Verification was not completed by November 15th.

Corrective Action Needed: Submit a statement outlining when the agency will begin the verification process in future years to ensure the process is completed on time.

Meal Counting and Claiming

Edit Check

Regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made. The [daily participation/edit check form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc) is provided for those manually consolidating claims—or without a software edit check function. School agencies are not required to use this particular form but must perform an edit check after completing the calculations shown on the bottom of the form. Those school agencies with computerized meal counting systems or in process of purchasing such a system should ask vendors about the edit check feature.

Findings and Corrective Action Needed: Meal Counting and Claiming

- **Finding #1:** An edit check of daily meal counts is not completed prior to submission of the monthly NSL claim.

Corrective Action Needed: Begin conducting a monthly edit check. Submit the NSLP claim for the month of January along with either the manual edit check form, or an electronic software report. Work with Option C to determine if there is an edit check function that will pull daily meal counts by category. The *Daily Report* in Option C cannot be used until the error in the paid category is corrected.

A non-systemic error was found in the paid count for the review period. Fiscal action will be taken on the difference between the SFA and SA counts.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

Thank you to the staff of St. Kilian School for their time, cooperation, and warm welcome during the Administrative Review. A special thanks to the Principal and School Lunch Coordinator for providing documentation prior to the on-site visit.

The School Lunch Coordinator and school nutrition professional work well together and are friendly and kind to the students. One small, but noteworthy, practice that was observed onsite was the School Lunch Coordinator cutting the toasted cheese sandwiches in half for students so they are easier to consume. The School Lunch Coordinator does an exceptional job with food safety, not only taking and recording temperatures, but in all kitchen practices and record keeping. Additionally, the kitchen was organized and clean.

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 National School Lunch Program!

Technical Assistance:

Production Records

Lunch production records did not have the planned number of reimbursable and non-reimbursable (adult) meals filled in 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)

During lunch service observation, it was noted that there was a teacher that told students, “You need to grab your milk.” A teacher also required a student to select fruit, even though the student already had a reimbursable meal with greater than ½ cup vegetable. If a student does not want to select milk or any other components as part of their reimbursable meal, they do not necessarily have to. In order for a meal to be reimbursable, a student must select three full components, one of which is ½ cup fruit, vegetable, or combination. Instead, a better practice would be to ask students if they would like milk, fruit, etc. or encourage them to try it.

While the School Lunch Coordinator/point-of-service has had OVS training in the past, an OVS refresher may be beneficial. The [Offer Versus Serve Guidance Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) and [Offer Versus Serve webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (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 are selected using tongs. If a portioning utensil cannot be used to serve certain fruits and vegetables, such as broccoli pieces or sweet potato sticks, signage can be utilized to let students know how many pieces, or sweet potato sticks in this example, they can select to have the full planned portion size of $\frac{1}{4}$ cup. Examples of this type of signage and printable signage can be found on DPI SNT's [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/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. Kilian School's responsibility to ensure all meal pattern requirements are met. St. Kilian 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. Kilian 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. Kilian School. Sometimes St. Kilian 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 tomato soup on the day of review. Even though there are instructions listed on the package, this recipe should be standardized to meet each food service operation's 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, brown rice, and tomato soup 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.

Expense Categories

The AFR requires reporting of expenses by program and category. There are five required categories: Labor, Food, Equipment, Purchased Services, and Other. [This resource](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc>) provides example expenses for each of those categories.

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.
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- Finding #1:** Revenues are not separated by program and expenses are not separated by program and the correct expenditure categories.

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. In addition, fix where the NSLP revenue is reported and the categorization of NSLP and nonprogram food expenses. Submit the paper adjustments to the consultant. Once reviewed, the DPI accountant will enter the corrected report online.

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](#) 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. 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 St. Kilian School using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html). **Alternatively, once the Annual Financial Report is updated and correctly allocated, complete the [USDA Nonprogram Food Revenue](#) tool for the 1718 SY (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls).** *If the agency is not in compliance, prices for nonprogram foods items may need to be raised.*

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance (TA)/Compliance Reminders

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).

Findings and Corrective Action Needed: Civil Rights

No findings. The agency is in compliance.

Local Wellness Policy

Commendations/Comments/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.

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:

- Adhering to USDA school meal regulations;
- Food and Beverage Marketing;
- Nutrition Promotion

Smart Snacks in Schools

Commendations:

St. Kilian 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

St. Kilian School has not had any fundraisers this school year but plans to have one exempt fundraiser in the spring. Please note the following information regarding 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](#) 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 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

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 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) (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- 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 confirming official and Authorized Representative have not met training hours for the current school year. The CO and AR also have roles related to application determination, financial reporting, and monthly claim submission.

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 will count towards annual training hrs.

- ❑ **Finding #2:** 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) and obtain 12 training hours per year.

Water

The agency is in compliance.

Food Safety and Storage

Commendations/Technical Assistance/Compliance Reminders

Food Safety Plans

The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. Temperature logs, calibration logs, and sanitizing solution logs were up-to-date.

Storage

The on-site storage areas including freezers, refrigerators, dry good storage rooms and other areas in the preparation and service areas are very clean and tidy. Staff take pride in their work, which is contributing to a pleasant meal eating environment for the students.

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/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:** Staff are not taking daily temperatures of the chest freezer. There is a small amount of food service inventory stored there. Per SOP #10, 1—your procedure is to take temperatures daily.
Corrective Action Needed: Submit a copy of the freezer temperature log that has been completed for the rest of January.

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. Kilian 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:

- Lincoln Elementary - Hartford Joint #1 School District (production kitchen for St. Kilian School's meals)
 - Yellow round tortilla chips- MN
 - Chocolate bear grahams- HI
 - Soy bean oil- marketed by
 - BBQ sauce- IL
 - Mayo- IL
 - Oregano- marketed by
 - Cilantro flakes- distributed by
 - Fruit juice- MN
 - Baked beans- TN
 - Tortilla- MN
 - Bagels- NJ
 - Butter- marketed by
- St. Kilian School
 - Teddy grahams- distributed by
 - Mayo- made in the USA
 - Salt- distributed by
 - Tomato soup- 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

The agency is in compliance.

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!