

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. Boniface School

Agency Code: 06-7396

School(s) Reviewed: St. Boniface School

Review Date(s): 5/16-17/2017

Date of Exit Conference: 5/17/2017

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 for a nominal charge of \$10 per person. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training 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, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Boniface School for the courtesies extended to Public Health Nutritionist Rebekkah Plano and myself during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Comments/Technical Assistance/Compliance Reminders

- The direct Certification process must be completed by schools participating in the National school lunch program at least 3 times annually. Direct certification qualifies children for meal benefits without an application based on their eligibility for food share. The DC process requires that the school submit a list of their enrolled students to the division of children and families to receive a match of students that are automatically qualified for free meal benefits. Beginning school year 2017-2018, eligibility will also include matches for children receiving Medicaid. Schools should conduct the match process at or near the beginning of the year, again near the semester break and once more around spring break. The first match at St. Boniface was conducted in December 2016. Note that while there weren't any students identified through the DC match at St. Boniface, schools are still required to complete the process and save the documents with their other NSLP files.
- During meal service water was available to students by way of a water fountain located in the cafeteria near the serving line. While this does meet USDA guidelines, that water be available at no charge to students during meal service times, it would be nice to offer cups for students to take water to their tables if they choose. Under Offer vs. Serve students are not required to select milk with their meal and a cup for water would provide them an alternate beverage option.
- During the review technical assistance was provided on requirements for USDA's Paid Lunch Equity (PLE) regulation. The PLE is intended to ensure that schools are charging an adequate amount for paid student meals. While the PLE is based on the difference between the federal free reimbursement and the federal paid reimbursement USDA does not impose a maximum. When setting meal prices, schools need to take care that they follow the intent of USDA child nutrition programs to "keep the cost to participating students as "low as possible." During the review an amended PLE tool was completed for 2017-18. Meal prices at St. Boniface meet appropriate guidelines.
- The determining official that is named on the online contract is the person responsible for approving free and reduced priced meal applications. The annual online contract indicated that the administrative assistant is the determining official but it appears that the head teacher, is actually assessing the applications and sending out the letters to households. It is important to update the new online contract for 2017-2018 school year to reflect whom is responsible for what with regard to the administrative pieces of the program.
- USDA has recently updated their guidance on providing meals to students requiring food modifications because of a disability. Guidance was provided during the onsite visit to ensure understanding of accommodating students with special dietary needs. This requires that any medical statement signed by a licensed practitioner (In Wisconsin, the individuals licensed to write prescriptions) must be accommodated. For additional information on accommodating students with special dietary needs please access the DPI website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs> .
- It is a reminder that the annual public release document must be submitted to area publications and grassroots organizations but SFAs are not required to pay to have it published.

- It is a reminder that the maximum amount that may be charged for a reduced priced meal is forty cents during any year. This is the difference between the annual federal reimbursement rate for a free meal and the annual federal reimbursement rate for a reduced meal.
 - Extensive technical assistance was provided during the review on options for maximizing student benefits while maintaining a fiscally responsible food service program as outlined below.
1. Remain in the National School Lunch Program and continue to operate the program as a self-operation. The benefit of doing so would be to provide the student population that are eligible for f/r meal benefits (41% of enrolled students) to continue to receive those benefits. The challenges with this include finding administrative and production time to ensure that USDA program regulations are met.
 2. Remain in the NSLP under Joint Agreement with another participating school. <https://www.google.com/url?q=https://dpi.wi.gov/school-nutrition/procurement/joint>. Under this model St. Boniface would still be responsible for administering the program, submitting claims, ensuring regulatory compliance, etc. but would purchase meals from a neighboring district. Should St. Boniface select this option, another school would prepare and either deliver the meals or arrange to have them picked up by St. Boniface. St. Boniface would serve the meal, (and may also partially prepare items, such as heating up items.) Under this agreement St. Boniface would still accept f/r applications, determine benefits, submit reports and reimbursement claims but the food would be mostly prepared by the selling district.
 3. Remain in the NSLP by entering into an Alternate Authority Agreement. <https://www.google.com/url?q=https://dpi.wi.gov/school-nutrition/procurement/alternate-agreement> . This agreement between a neighboring district and St. Boniface would give all responsibility for operating the school nutrition program to the larger school district. St. Boniface would receive the meals and students would be eligible for meal benefits but claims, reports, applications, verification, etc. would be the responsibility of the alternate authority. School. Under this agreement St. Boniface would not receive USDA foods, or claim reimbursement.
 4. Discontinue participation in NSLP and enter into the Special Milk program (SMP). <https://dpi.wi.gov/school-nutrition/milk-programs/special-milk>. Under this program all milk that is served to students during the school day would be reimbursed. Students would receive milk at a reduced rate. Meals could still be served but meal pattern would not have to be met. All milks served to children throughout the day would be reimbursable. Options are available to provide milk free to children qualifying for free milk. The SMP does not include a reduced rate option. The SMP is only available to students that do not have access to USDA school lunch or breakfast programs. Additional information on the SMP may be accessed at:

Meal Access and Reimbursement

Findings and Corrective Action Needed

APPLICATIONS – CLAIMS - EDIT CHECK

Applications and benefit issuance

The applications for meal benefits were approved correctly. The applications themselves were missing the exact date of determination and did not include the school based documentation required by USDA. In addition the benefit issuance list didn't include the date the student first became eligible. Under USDA regulations, students

may not receive meal benefits until the determining official has determined the date the application was approved. Dates indicating a month and year only are not appropriate because the student isn't eligible until final approval is given. Meal benefits may not be backdated. If the household qualified the previous year for free/reduced priced meals they maintain the benefit for up to 30 days into the new school year or until a new application is approved.

Your signature, accepted on the summary report page during the exit conference indicates the technical assistance provided with regard to processing applications as well as the intent of St. Boniface School to approve all future applications following USDA guidance. Information on how to accurately approve applications is available in the Eligibility Guidance Manual (EGM).

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-2016.pdf>

☐ **Finding #1: Edit Check** – The required edit check document was incomplete. U. S. Department of Agriculture (USDA) 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 edit check is based on the attendance factor compared to the highest number of students eligible for free or reduced priced meals in any given month. Technical assistance, with options for utilizing an excel spreadsheet for this purpose was provided during the review process.

Corrective Action Needed:

Please submit a copy of the May 2017 claim along with a copy of the May 2017 edit check document. In addition submit a detailed statement indicating the steps the SFA has taken to ensure that future claims submissions are based on an appropriate edit check. .

☐ **Finding #2: Verification** – The verification process was not completed per USDA regulations. The verified application was selected based on an attached tax return submitted with the original application rather through random selection. While the SFA indicated they told the household they were using their application for verification, they were not notified through formal process, the confirmation review was not completed as required, the household was not notified of the outcome of the verification process, and verification activities were not documented.

Corrective Action Needed:

View the verification webinar on the DPI website: <http://media.dpi.wi.gov/school-nutrition/verification-process/story.html> or attend the free/reduced/verification course at one of the summer training sites: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snsdc-course-descriptions-2017.pdf> . After training is complete, submit a detailed statement and summary indicating the steps St. Boniface School will take to ensure that future verification activities will meet USDA regulations.

- The Verification process is required for all schools with one or more paper applications. When applications are chosen for verification, the person designated as the Confirming Official should be reviewing these applications prior to contacting the family to ensure the initial determination is correct. There is a place for the Confirming Official to sign and date on the back of the application.
- Verification requires that applications be selected through a totally random selection process with all applications receiving an equal chance for selection. When the application with the tax return was submitted originally the SFA should have contacted the household at that point and asked them if the tax return was reflective of their current income. If the household was then randomly selected for verification, they should have been formally notified and allowed to submit additional or updated documentation at that time if circumstances warranted.

❑ **Finding #3: Verification Summary Report** – The verification summary report was submitted with errors and not submitted by the February 1, deadline. The number of applications and students per application listed on the report were incorrect.

Corrective Action Needed: View the verification summary report webinar on the DPI website: <https://media.dpi.wi.gov/school-nutrition/submitting-the-verification-collection-report/story.html> or attend the free/reduced/verification course at one of the summer training sites: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snsdc-course-descriptions-2017.pdf> . After training is complete, submit a detailed statement and summary indicating the steps St. Boniface School will take to ensure that future verification summary reports are entered correctly in a timely manner.

CLAIMS PROCESS: POINT OF SERVICE

Finding #4: Students were counted for meal reimbursement using an unapproved counting system. USDA requires that claims for reimbursement be based on an approved point of service (POS). The St. Boniface contract indicates that students are marked off a check list at the end of the line. During meal service it was determined that students went through the line, went back to obtain their milk and were not counted for the meal until the lead teacher came into the lunchroom and visually marked all students with a tray in front of them. By the time the lead teacher was in the room most students were already enjoying the meal, consuming complete menu items. As a result it was impossible to determine if the children had a reimbursable meal on the tray when they left the meal service line.

Corrective Action Needed: Please submit a detailed statement indicating the steps that will be taken to ensure that future claims will be based on an accurate POS count is taken at the time students receive the meal.

- Extensive technical assistance was provided during the review on the importance of obtaining accurate meal counts based on an appropriate POS. After providing guidance during the review the administrative assistant marked student meals at the end of the line, per the online school nutrition contract for the remainder of the onsite visit. Other options for managing the POS were offered including having each teacher mark his/her own students off the list after they have passed the last meal component.

Meal Pattern and Nutritional Quality

Commendations and Appreciations

Sincere thanks to the school nutrition professional, office administrator, head teacher, and pastor/principal of St. Boniface Parochial School. We appreciate your time and efforts spent participating in the onsite review. The school nutrition professional is dedicated to and cares deeply for the students. She provides both appetizing meals and encouragement on the serving line. The salad bar is colorful and varied. Students interact with student helpers, and in the process, they practice portion control and good manners. Thank you also for your openness to feedback, both positive and constructive criticism. Open communication with the school nutrition professional revealed multiple areas of opportunity for the child nutrition programs at St. Boniface Parochial School. Extensive technical assistance was provided onsite and is reviewed and summarized below.

Technical Assistance and Program Requirement Reminders

Lunch Meal Pattern

The meal pattern for Child Nutrition Programs was updated as part of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 with many of the updates to the National School Lunch (NSLP) implemented July 1, 2012. The updated meal pattern requires specific daily and weekly minimum offerings for meat/meat alternate and grains for each age/grade group. All grains offered with reimbursable meals must be whole grain-rich. The updated meal pattern created separate components for fruits and vegetables with weekly requirements outlined for the five required vegetable subgroups (dark green, red/orange, beans and peas [legumes], starchy, and other). More information regarding the updated meal pattern can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>.

All five components are equally important to a reimbursable meal. Under Offer versus Serve, a student must select three of five components offered, including 1/2 cup fruit and or vegetable, as part of his or her reimbursable meal. He or she may decline the entrée, which is often the grain and/or meat/meat alternate component, in favor of fruit, vegetables, and milk. In contrast to My Plate, which identifies protein and dairy as food groups, the HHFKA meal pattern identifies meat/meat alternate and milk as components. These terms are not interchangeable. Not all dairy products, such as sour cream, are not creditable in the NSLP.

Following the K-8 meal pattern, planned portion sizes are the same for all students in kindergarten through eighth grade. Discontinue menu planning using minimum and maximum planned portion sizes (e.g. minimum 3 meatballs, maximum 8 meatballs), which results in inconsistent crediting and potential noncompliance with daily and weekly meal pattern requirements.

Second Servings

Discontinue the practice of offering second servings free of charge to students. For example, students may choose either spaghetti or a turkey sandwich; they may not have both. Offering second servings complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly averages. If students are still hungry, second servings may be sold a la carte. Repeat violation during a subsequent Administrative Review will result in fiscal action.

Allowable Milk Types

The only allowable milk types to serve in child nutrition programs are non-fat unflavored milk, nonfat flavored milk (e.g. chocolate), and 1% unflavored milk. Neither 1% flavored nor 2% (flavored or unflavored) milk can be served. Please discontinue serving 2% unflavored milk. As a reminder, at least two choices of allowable milk types must be offered daily at each meal. Repeat violation during a subsequent Administrative Review will result in fiscal action.

Sodium

The updated meal pattern mandated by the HHFKA outlined a sodium restriction using three targets to allow for a gradual implementation. The first target was implemented July 1, 2014. Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, pickles, olives, and processed food items. The use of these products should be closely monitored and limited to meet sodium requirements. Offer pickles and croutons only when appropriate to the planned menu (e.g. pickles with hamburgers). Remove the salt shaker from the serving line. Purchase low sodium or no salt added canned vegetables and low sodium canned soups (e.g. Campbell's Healthy Request) when available.

Condiments

Condiments can be a significant source of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Sodium Target 1 remains in effect, which limits sodium to 1230 milligrams for K-8 lunch meal pattern. Please monitor condiment usage and communicate appropriate portion sizes to students. Consider offering reduced fat, low fat, or fat free mayonnaise, sour cream, and salad dressing instead of full-fat varieties.

Discontinue the practice of adding butter to vegetables and breads prior to serving. Offer portion controlled butter (e.g. pats, tubs) only when appropriate to the planned menu (e.g. dinner roll).

Portion Control

Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e. the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches children good eating habits by demonstrating and providing appropriate portion sizes of each food group at a meal. Proper portion control also ensures a reimbursable meal is served, so students receive the planned quantity of the food component (e.g. two ounce equivalents of grain) or nutrients. Food costs are controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase. Note, portion sizes that are too large can sometimes discourage younger children from eating.

Proper portion size utensils should be used. Scoops and spoodles are used to serve fruit, mashed potatoes, rice, and more. They measure different serving sizes and are numbered to differentiate the sizes, such as #8 (1/2 cup), #16 (1/4 cup), etc. The handles are often color-coded; ask the manufacturer for a reference to help correctly identify each scoop size. Slotted, pierced, or perforated spoodles are important for serving foods prepared in liquid when you do not want to add the liquid to the portion. Measuring cups are used for measuring liquid and dry goods. Metal cups are used for measuring dry goods, and glass cups are used for measuring liquids. Ladles are used for serving soups, gravies, sauces, stews, and creamed foods. If a tool does not measure, it is not a portion size utensil (e.g. tongs, spatulas, spoons). Remember, a pinch or a handful is not a measurement!

Meat/meat alternate is credited by weight, not by fluid ounces. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 3 ounce spoodle for an intended 3 ounce (by weight) serving. To ensure that students are receiving the adequate amount of meat/meat alternate, weigh the meat/meat alternate, then determine which scoop will hold that weight of meat.

Standardized Recipes

Use of standardized recipes is another important part of child nutrition programs. Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Continue to use the resources on the DPI website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>. We encourage viewing the webcast, What's the Yield with Standardized Recipes?, which guides the viewer through the recipe standardization process. The webcast is located at the following address: <http://dpi.wi.gov/school-nutrition/training/webcasts#sr>.

Crediting Documentation

Processed products require a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number, weights of raw and cooked ingredients, portion size, statement of contribution to meal pattern requirements, and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead, and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson.) If a processed item does not have a valid CN label or PFS, it may not be credited when served as part of NSLP. Furthermore, only foods with a standard of identity listed in the Food Buying Guide can be purchased and used for child nutrition programs when shopping at a grocery store.

Food manufacturers continually reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. These records should be reviewed and updated at least annually and as new products are purchased or substituted. Please discard any outdated crediting information for products that have changed or that are no longer purchased. State-Processed Products and USDA Brown-Box Foods have fact sheets, detailing meal pattern contributions. The fact sheets are updated annually. USDA Brown-Box Foods fact sheets can be found here:

<http://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>. State-Processed Products fact sheets can be found here: http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed_nutritioninfo_1617.pdf.

Offer versus Serve

Under OVS at lunch, a student must take at least three components in the required quantities. One selection must be at least 1/2 cup (total) from either the fruits or vegetables component. Depending on the planned menu, the student may need to select more than one food item to have the minimum quantity needed for a component to be credited.

If only three components are selected, and two of these are fruit and vegetable, the student may only select the 1/2 cup portion for the fruit OR vegetable. For the other two components, the student must select at least the minimum daily required serving of the components for them to be counted. Three food components are required for an adequate nutritious meal for students and to warrant the Federal reimbursement. Within each component, different food items may be offered, giving students many combinations for building a reimbursable meal. Other than selecting the required minimum 1/2 cup fruit and/or vegetable serving, it is the student's choice to select or decline a food component. Food service staff and teachers cannot require students to take entrees or milk.

Although all students observed at lunch took a reimbursable meal, staff involved in child nutrition programs must fully understand the OVS requirements. The current Offer Versus Serve Guidance manual is available on our website at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>.

Signage

Adequate signage helps ensure students accurately select a reimbursable meal. Signage was available behind the steamtable; however, it may be helpful to reposition the sign nearer to the beginning of the serving line. Update signage daily to include all menu items. Indicate clearly to students how many components must be taken to constitute a reimbursable meal. It may be helpful to post pictures of the amount of each vegetable the menu planner expects the student helpers to serve to their peers. If you are interested in ordering signage from the DPI School Nutrition Team, please visit <http://dpi.wi.gov/team-nutrition> and complete the Resource Order Form.

Whole Grain-Rich Requirement

Some of the grain products currently in use are not whole grain-rich (WGR), such as hamburger buns, pasta, and garlic toast. However, since July 1, 2014, all grain products for child nutrition programs are required to be whole grain-rich. A whole grain-rich food is not necessarily 100% whole grain, but at least 50% of its grain ingredients must be whole grain. In order to be whole grain-rich, a grain food must list a whole grain as its first ingredient. Any other grain ingredients in the product must be enriched, if not whole grain. Or, documentation must be available in the form of a product formulation statement (PFS) to show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients. USDA has a very thorough Whole Grain Resource that provides tools and tips for identifying whole grain-rich products: <http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>.

Grain-Based Desserts

No more than 2 ounce equivalents of grain-based desserts can be offered per week at lunch. Grain-based desserts that are whole grain-rich can count toward the grain component, but grain-based desserts that are not

whole grain-rich (made with enriched grains) cannot count toward the grain component. However, grain-based desserts contribute toward the weekly grain-based dessert limit regardless of whether they are whole grain-rich or not.

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. The production record template currently in use is out of date and uses language that is not currently applicable (e.g. Traditional Menu Planning). Furthermore, there is missing information, such as menu type, total number of purchase prepared, total number of portions prepared, actual usage by type, planned portion size and actual usage for condiments and any extra menu items, and substitutions made to original plans. While there is no required production record template, there are some examples that may be used on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>. A copy of the production record requirements (“Must haves and Nice to haves” list) can also be found at that link.

Weight versus Volume

Use cup volume amounts when recording portion sizes on the production records for fruits and vegetables. This will be the easiest way to make sure the meal pattern is being met. For meat/meat alternate and grain items crediting information should be recorded in ounce equivalents. Please ensure weight and volume are not being used interchangeably for crediting purposes. A portion control webcast, which describes portion control techniques and explains the difference between weight and volume, is available from the School Nutrition Team at <https://dpi.wi.gov/school-nutrition/training/webcasts#pc>. Earn fifteen minutes of continuing education credit by viewing the webcast.

Preschool Students and the National School Lunch Program

To ensure reimbursable meals are planned and served, information pertaining to the 3K and 4K students cannot be grouped with the K-5 information going forward. Note that the Traditional Food Based Meal Pattern for Preschool or the HHFKA Meal Pattern when serving meals to children ages 1-5 in the NSLP will be replaced by the updated Child and Adult Care Food Program (CACFP) meal pattern requirements and the NSLP and SBP infant and preschool meal patterns when the final rule is implemented October 1, 2017.

Cycle Menu Recommendation

Using a cycle menu can ease the burden of menu planning once the cycle has been set and also help to ensure that meal pattern requirements are being met after a compliant cycle has been planned (if served as planned). They can also aid in purchasing if production records are reviewed and analyzed to forecast meal counts based on historical data.

If using a cycle menu, production records can also be partially completed including the menu items, crediting information, serving sizes (potentially planned quantity), etc. and photocopies can be made. If completed electronically, they can be printed, and the remaining information can be filled out during production and after meal service.

Training

We recommended anyone involved with the school meals program attend DPI training classes. The classes are offered throughout the summer and selected other times during the year. Classes are provided free of charge. Numerous webcasts are also available online. Travel and/or meal expenses are allowable food service expenses for your program. Classes provide an overview of all areas of the USDA requirements for the federal nutrition programs including verification, free/reduced applications, civil rights, USDA Foods, menu planning, production records, and record keeping requirements. Information on upcoming summer classes is available on the DPI website at <http://dpi.wi.gov/school-nutrition/training>.

Corrective Action

Meal Pattern Finding #5: Unallowable milk type, 2% unflavored milk, served on day of review. The only allowable milk types to serve in child nutrition programs are non-fat unflavored milk, nonfat flavored milk (e.g. chocolate), and 1% unflavored milk.

Required Corrective Action: Submit an invoice from your milk supplier, detailing purchase of allowable milk types only.

Meal Pattern Finding #6: Hamburger buns, garlic bread, and pasta are not whole-grain rich products. Grains that are not whole grain-rich cannot be credited toward the grain component.

Required Corrective Action: Discontinue serving these products and submit labels for replacement products.

Meal Pattern Finding #7: Insufficient crediting documentation for mini corn dogs, fish patty, sandwiches (ham, turkey, peanut butter & jelly), and glazed carrots served during the week of review.

Required Corrective Action: Please submit acceptable crediting documentation, such as a product formulation statement (PFS) or child nutrition (CN) label, for mini corn dogs and fish patty. Also, submit standardized recipes for ham sandwich, turkey sandwich, peanut butter & jelly sandwich, and glazed carrots, including recipe yields (serving size for single portion(s), total number of portions, and total volume or measure [gallons]). Complete labels with nutrition facts (name of the food item, brand name, nutrition facts and ingredients) for all ingredients in recipes must be included.

Meal Pattern Finding #8: Due to a significant amount of missing information, requested above, I was unable to complete a review of compliance with weekly component requirements for lunch.

Required Corrective Action #2: Please submit all of the corrective action requested above. Note that the menu will be reviewed for compliance with component quantity requirements once all necessary documentation is obtained. If the menu does not meet all weekly requirements at that time, further corrective action may be required.

Meal Pattern Finding #9: Offer vs Serve is not being properly implemented at lunch.

Required Corrective Action: Anyone involved in the child nutrition programs at St. Boniface Parochial School, including the individuals who prepare the meals and operate the point of service (POS), must watch the Offer Versus Serve webcast on the DPI School Nutrition Team webpage, located at the following address: <http://dpi.wi.gov/school-nutrition/training/webcasts#cyc>. **Please submit a roster or checklist indicating all staff have viewed the webcast.**

Meal Pattern Finding #10: Current production records do not include all required information and are not filled in completely.

Required Corrective Action: Update production records to include the following missing information: menu type, total number of purchase prepared, total number of portions prepared, actual usage by type, planned portion size and actual usage for condiments and any extra menu items, and substitutions made to original plans **Please submit two full weeks of completed production records, updated to reflect these requirements and filled in completely.**

General Areas of Review

RESOURCE MANAGEMENT – ANNUAL FINANCIAL REPORT

Finding #11: The 2015-2016 annual financial report was submitted with errors. The report showed a negative ending fund balance even with a transfer from the general fund. Under USDA regulations schools may not end the year with a negative fund balance. Funds transfers must be adequate to cover the deficit. A

comprehensive review of financial management protocol for this SFA included a detailed review of expenditures and revenues for school year 2015-2016. In addition it was noted that extra milks and adult meal purchases fall under non-program foods and as such should be assessed as Ala Carte.

Corrective Action Needed: Please amend and submit the annual financial report to the reviewer by the action date listed on the signature page.

Technical assistance included detailed guidance on completing the annual financial report and advisement of a new DPI reporting system for school year 2016-17. For additional information on financial management please refer to the DPI website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial> . In addition you are strongly encouraged to attend summer training on financial management as the 2016-2017 annual financial report process has changed with new reporting requirements.

GENERAL PROGRAM COMPLIANCE - PROFESSIONAL STANDARDS

Finding #12: Professional Standards training requirements have not been met or tracked for school nutrition employees.

Corrective Action Needed: Obtain and track training hours for employees working in school nutrition. Submit a copy of the tracking document.

- 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. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.
- 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.
- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Directors	Managers	Other Staff (20 hrs or more/week)	Part Time Staff (less than 20 hrs/week)
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

GENERAL PROGRAM COMPLIANCE - CIVIL RIGHTS

Finding #13: Annual Civil Rights training has not been completed. Civil rights training is required annually for all front line staff working in school nutrition programs. Additional information on training requirements, including a power point and sign off sheet is available on the DPI website: <https://dpi.wi.gov/school->

[nutrition/national-school-lunch-program/civil-rights](#) . In addition the required annual self-evaluation form was not completed or on file.

Corrective Action Needed: Please conduct Civil Rights training for required front line staff as required and submit a copy of the attendance record: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cr_trn_log.doc.

The civil rights self evaluation form was completed during the onsite review. No further action is necessary. However it is important to make note of this requirement and complete the form <https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc> by Oct. 31 annually.

- 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. The form to assist in filing these complaints can be found on the DPI SNT website at https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf

GENERAL PROGRAM COMPLIANCE – SANITATION AND FOOD SAFETY

Finding #14: The most recent sanitation inspection document was not posted in an area visible to the public.

Corrective Action Needed: Submit a statement indicating where the sanitation inspection report has been posted.

Finding #15: The food safety plan is not up to date. All schools must have a comprehensive site-specific food safety plan on site which includes all process 1, 2, and 3 items, all standard operating procedures (SOP) for each individual site, all equipment, and food service staff and be reviewed yearly. Updated prototype food safety plan templates and SOPs may be found at our website under <http://dpi.wi.gov/school-nutrition/food-safety#fsp>.

Corrective Action Needed: Update the food safety plan as directed by USDA guidelines and submit copies of the updated document as part of the corrective action response.

- All schools must have a comprehensive site-specific food safety plan on site which includes all process 1, 2, and 3 items, all standard operating procedures (SOP) for each individual site, all equipment, and food service staff and be reviewed yearly. Updated prototype food safety plan templates and SOPs may be found at our website under <http://dpi.wi.gov/school-nutrition/food-safety#fsp>.

GENERAL PROGRAM COMPLIANCE – SCHOOL WELLNESS POLICY

Finding #16: A school wellness policy has not been developed. School wellness policies have been required for all SFAs participating in USDA child nutrition programs since 2004. The original rule required that schools develop policies with a committee of invested stakeholders including a school administrator, faculty member, parent, and if possible a student along with other interested parties. The policy was intended to provide schools with the tools to effectively address student health and wellbeing. In 2016 the requirements of the school

wellness policy were expanded to include minimum policy requirements, ensure stakeholder participation in the development and updates of the policy, and assess and disclose compliance with the public.

Corrective Action Needed: Please submit a timeline for creating a school specific wellness policy developed under the guidelines listed above. The outline should include the names of committee members, a meeting timeline, and anticipated date of completion. Resources for completing a school wellness policy are listed below.

Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at:

<https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at:

<http://dpi.wi.gov/school-nutrition/wellness-policy>.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

