

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Grace Evangelical Lutheran Church

Agency Code: 677071

School(s) Reviewed: Grace Evangelical Lutheran School

Review Date(s): May 9-10, 2017

Date of Exit Conference: May 10, 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. 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 [DPI SNT webpage](#).
- 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 [DPI SNT GOALS webpage](#).
- 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 [DPI SNT Financial Management webpage](#) under the *Unpaid Meal Charges* section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Grace Evangelical Lutheran Church for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information when necessary. All were very receptive to recommendations and guidance. It was truly a pleasure visiting Grace Evangelical Lutheran.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

47 eligibility determinations were reviewed, 0 errors were identified.

All free/reduced applications and the Direct Certification (DC) runs were available for review. Thank you to the Determining Official (DO) for being available to answer questions, clarify information and follow-up with households when necessary. The DO is new to the position but is knowledgeable on USDA regulations and requirements for processing applications. The DO seeks out answers when questions arise on the DPI SNT website and by contacting DPI SNT Staff. The DO is detail-oriented and organized, two excellent characteristics for processing and distributing meal benefits. Kudos for a job well done!

The SFA is provided the following technical assistance for *Certification and Benefit Issuance* by sub-topic to ensure the SFA is aware of program details and updates.

Household Size Box

If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.

If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional Office, any application that does not have this box completed is considered an incomplete application.

Disclosure

SFAs must seek written consent from the household to use information provided on the meal application or through DC for non-food service program purposes, such as athletic or testing fee waivers. Consent must be obtained each school year. A template [Sharing Information Form](#) is located on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

Alternatively, a SFA can ask programs requesting benefit information to have households self-disclose by providing a copy of their [Letter to Households of Approval/Denial of Benefit](#) notification letter. This option is encouraged as it reduces administrative recordkeeping for food service.

A [Disclosure Agreement](#) form should be signed and on file at the SFA for anyone receiving eligibility information to approve students for non-food service program benefits or with access to the meal benefit information, including building secretaries. This form can be found on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

Incomplete Applications

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. The SFA may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including email. The Determining Official (DO) should document the details of the conversation, 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.

Transferring Students

SFAs can share eligibility data with other districts when requested for specific students but are not required to do so, as noted on page 39 of the [Eligibility Manual for School Meals](#).

If a student(s) received free meals via Direct Certification (DC) at a previous SFA, a copy of the original DC run with all names blacked out except for the student(s) requesting free meals should be obtained from the previous SFA. The date of the DC run as well as the match code for the student(s) should be visible to the new SFA. If a student received free meals via application at a previous SFA, a copy of the original application should be obtained. Alternatively, the student(s) can be run individually through DC or complete a new meal application with the new SFA.

Limited English Proficiency (LEP)

Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.

To assist SFAs in reaching households with limited English proficiency, the DPI SNT provides the Wisconsin-ized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian on the [DPI SNT Free and Reduced Price Meal Applications and Eligibility webpage](#).

Effective Date of Eligibility

SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is received if a process is in place to capture when the application is received. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The DPI SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

Self Employed

As noted in the [Eligibility Manual for School Meals](#), only self-employed persons and farmers may use last year's income from their taxes to project their current year's net income, unless their current net income provides a more accurate measure. All other wage earners must report current income. When an application is received that has both a self-employed person and/or farmer along with another income earner, line 12 (self employment) and line 18 (farming) from the [1040 form](#) should be recorded along with the current income from the other income earner.

Public Release

The SFA is reminded that the Public Release must be sent to both media *and* grassroots organizations and, as applicable, local unemployment offices and major employers contemplating or experiencing large layoffs. The SFA sent the Public Release to a media outlet but not to a grassroots organization.

Verification

Verification activities were not completed by November 15th. The confirmation review took place after the household was contacted for verification. The SFA did not enforce due dates for the household selected for verification. As discussed during the on-site, verification is intended to maintain the integrity of USDA Child Nutrition Programs. Not abiding by established rules and timeframes weakens this method of ensuring program integrity. Please see the *Finding* and *Corrective Action* below that addresses verification.

Meal Counting and Claiming

Breakfast was observed on Tuesday, May 10, 2017. Three non-reimbursable meals were observed, of which two were corrected during the lunch period, leaving one meal deemed non-reimbursable and requiring fiscal action. All three meals were short the ½ cup fruit and/or vegetable requirement. As discussed under the *Offer Versus Serve* section below, the observation of the non-reimbursable meals is attributed in part to the flow of the meal service line. Please see the *Finding* and *Corrective Action* below that addresses this issue.

The April 2017 claims for reimbursement for the National School Lunch Program (NSLP) were reviewed and validated. No errors were identified.

Finding #1: Verification activities were not completed by November 15th. The SFA did not enforce due dates for households selected for verification. The confirmation review took place after, not before, the household was contacted for verification.

Corrective Action Required: Please review the requirements of *Verification*, both on the [DPI SNT Verification webpage](#) and the [Eligibility Manual for School Meals](#). Submit a summary detailing how the SFA will ensure *Verification* is completed correctly in the future. Please provide explanation to demonstrate understanding of required response timeframes and the confirmation review.

Finding #2: Three non-reimbursable lunch meals were observed, of which two were corrected during the lunch period, leaving one meal deemed non-reimbursable and requiring fiscal action.

Corrective Action Required: The non-reimbursable meals appear to be attributed in part to the milk being located immediately after the POS staff and the lack of student ‘check out’ procedures with the POS staff, leaving little time for review of each student’s tray. USDA requires that all five components be made available to each student prior to the end-of-line POS staff. Options were discussed during the on-site for improving the flow of the meal service line while ensuring all meals are reimbursable. Options included reversing the meal service line, having students ‘check out’ with the POS staff by stating their name and showing their tray, and/or using tape or roping to have all students exit past the milk cooler. Please provide a summary detail the intent of the SFA to ensure all lunch meals are reimbursable.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to Taher for providing the requested documentation prior to the review and to the staff on-site at Grace Evangelical Lutheran Church for working with me and answering additional questions. Everyone here had a positive attitude and willingness to learn and make changes as needed. You are doing a great job serving the students at Grace Evangelical Lutheran Church!

Comments/Technical Assistance/Compliance Reminders

Weight vs. Volume

Unless an item is physically weighed, the serving size should most likely be recorded on the production records and/or standardized recipe as a volume. Spoodles measure volume, so while it may be labeled a 4 oz spoodle, this actually indicates that it holds 4 *fluid* ounces or ½ cup. It doesn't mean that the serving provided will necessarily weigh 4 oz.

Fruit and vegetable serving sizes should be documented as a volume measure for consistency with meal pattern requirements.

Crediting

Food manufacturers periodically reformulate products used in schools. It is important to stay current with these changes and ensure that the documentation on file matches the products in stock. Remove CN (Child Nutrition) labels directly from product packaging. Records should be reviewed and updated at least twice annually and as new products are purchased or substituted. Additionally, product formulation statements must clearly detail the ingredients and their creditable quantities in order to be served in Child Nutrition Programs.

CN labels are the gold standard for crediting foods towards meal pattern requirements. If a product is not CN labeled and cannot be credited using the Food Buying Guide, a product formulation statement (PFS) should be obtained. The chicken patty used during the review period is a CN labeled product, but a PFS was provided as documentation. While this is acceptable, it is recommended that the CN label from the product package be kept on file (either the actual CN label from the box or a photocopy of it).

It can be difficult to determine if a student has selected the required half cup fruit/vegetable when a self-serve garden bar is available. To aid in determining if they have selected a reimbursable meal, it is recommended that the quantity of each vegetable needed for ¼ cup be determined and documented (ex. The number of baby carrots needed for ¼ cup). This can be done one of two ways:

1. Use the Food Buying Guide to calculate the weight of ¼ cup of the vegetable. Then using a scale, place one piece at a time until the desired weight is reached.
2. Dice up the vegetable and see how many fit into a ¼ cup measuring cup.

Documentation and Vended Meals:

Part B.3.d states that the Vendor agrees to “providing the SFA with daily production/transport sheets indicating how menu items contribute to meal pattern requirements and *supporting documentation for contribution.*” This means that that food service staff on-site at Grace Evangelical Lutheran Church should have access to documentation necessary to credit foods served towards meal pattern requirements. This can be done with a binder of photocopied labels/CN labels/PFS, a flash drive with the documentation scanned in, or another electronic form of storing the information (such as Google Drive). Documentation should be kept up to date and reviewed at least twice annually.

Communication between the school and vendor needs to be strengthened.

- With two entrée options and meals being sent prior to morning counts being done, there is the possibility that counts will exceed the amount of food that was sent the previous day. The count should be padded to the extent determined necessary to avoid running out. However, a conversation should occur whether that will be done by the school or the vendor.
- An action plan should be developed outlining what is to occur should the count exceed the amount of food that has been sent.
- Delivery tickets must be complete and initialed when packed by the vendor as well as received by the school.
- Any substitutions must be clearly communicated. If a different product is provided, a revised recipe and/or explicit instructions on how the change affects meal preparation and service should be provided by the vendor.

Whole Grain-Rich

The Rice Krispie treat was not whole grain-rich and therefore cannot credit towards daily or weekly grain requirements or as a component under offer versus serve (OVS). However, it does still count towards the weekly grain-based dessert limit.

Dietary Specifications

Salt shakers are available for students to use in the serving line. This practice is strongly discouraged as added sodium makes it very difficult to stay within the sodium targets outlined in the meal pattern.

Training

Ongoing training is essential to staying informed of school meal requirements. It is strongly recommended that in addition to attending in person trainings (such as SNSDC), you utilize the [SNT Training website](#) for resources, including training webcasts that can be watched at your convenience.

Offer Versus Serve (OVS)

The staff member at the Point of Service (POS) has received training on Offer Versus Serve (OVS) and is knowledgeable of the requirements. However, as noted above, three non-reimbursable meals were observed, two of which were corrected during the lunch period, leaving one meal deemed non-reimbursable and requiring fiscal action. All three meals were short the ½ cup fruit and/or vegetable requirement. The non-reimbursable meals appear to be attributed in part to the milk being located immediately after the POS staff and the lack of student ‘check out’ procedures with the POS staff, leaving little time for review of each student’s tray. USDA requires that all five components be made available to each student prior to the end-of-line POS staff. Options were discussed during the on-site for improving the flow of the meal service line while ensuring all meals are reimbursable. Options included reversing the meal service line, having students ‘check out’ with the POS staff by stating their name and showing their tray, and/or using tape or roping to have all students exit past the milk cooler. Please see the *Finding and Corrective Action* above under the heading *Meal Counting and Claiming* that addresses this issue.

Finding #3: Currently, the production records being used do not document all of the required information. While there is not a specific template that must be used, it will be necessary to either update the current template or switch to a new production record template. The list of production record requirements, instructions, and templates are available on our website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/production-records>

1. The planned number of servings for each menu item should be documented as well as the actual number of serving prepared and total quantity prepared.
2. Actual milk usage must be documented daily.
3. All items offered as part of the reimbursable meal must be documented on the production records. The production records submitted for the week of review did not include the Rice Krispie treat that was served or the vegetables offered on the salad bar. Without documentation of the vegetables, it appears that the menu had multiple daily vegetable shortages, a weekly dark green subgroup shortage and a missing component for the chicken tender meal on Friday.

Delivery tickets from the week of review were used to confirm that vegetables were available and offered to meet daily minimum requirements and weekly subgroup requirements.

4. While the production record templates are provided by Taher, it is the responsibility of the school to ensure that the requirements are being met and that all items are properly documented.

*** Please note that on future Administrative Reviews, repeat violations of minimum quantity shortages may result in fiscal action*

Corrective Action Required: Please submit one week of production records showing that all of the production record requirements are being met and all items served as part of the reimbursable meal are being recorded. Additionally, please submit the *complete* and *initialed* delivery tickets for the same week.

Finding #4: Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized to reflect the products and practices that are used in your kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates were provided prior to the review and can be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.

It is essential that standardized recipes are prepared exactly according to the instructions in order to produce a consistent yield and quality as well as to ensure that a serving credits as intended towards meal pattern requirements. During observation of meal preparation, it was observed that recipes are frequently adjusted, such as using fewer onions in the chicken mixture for the quesadillas or not adding salt and pepper to the corn. These recipes should either be adjusted to reflect practices in this operation or the practices should be updated to follow the recipes exactly as written.

Additionally, the majority of recipes provided by Taher list ingredient amounts in weights rather than volume. There is no scale available in the kitchen at Grace Evangelical Lutheran Church, so staff estimates the correct volume to use which results in a final product that deviates from the standardized recipe.

Corrective Action Required: Please submit a written statement describing how the recipes and/or meal preparation practices will be adjusted to ensure that meals are being prepared and served as planned and in compliance with meal pattern requirements. Additionally, note if a scale will be purchased or if the recipes will reflect volumes to be used.

If changes to the recipe/s are planned, please submit an updated version of the Chicken and Cheese quesadilla recipe as an example of those changes.

The grilled cheese recipe currently lists white bread as an ingredient. Please update this to whole wheat bread and submit the corrected recipe.

Finding #5: The bread planned for the grilled cheese on the day of observation was not whole grain-rich. Therefore, it could not credit towards daily or weekly grain requirements and could not count as a component under OVS.

Corrective Action Required: The bread was substituted with a whole grain-rich product prior to service. No further action is needed.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Access to the SFA's Child Nutrition Report, which provides a compilation of meals claimed, reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, is described in the document [Viewing the Child Nutrition Report](#). The DPI Aids Register is also available to track all program deposits made to the SFA's account as well as the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. The Aids Register is available on the DPI SNT [Financial Management webpage](#). Both resources are also accessible from the [Online Services webpage](#).

Annual Financial Report

In SY 16-17, all revenues including reimbursements and student payments and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. Please note there are additional categories than in previous years:

- **NSL** - schools participating in the National School Lunch Program.
- **SB, SBSEVERE** - both regular School Breakfast and Severe Need Breakfast.
- **SK-NSL, SK-NSLAE** - both After School Snacks and Area Eligible Afterschool Snacks.
- **SMP** - Special Milk Program.
- **Grants** - all grant awards and expenditures.
- **WSDMP** - Wisconsin School Day Milk Program.
- **EN** - Elderly Nutrition.
- **Nonprogram Foods** - all Nonprogram Foods (including: a la carte items, adult meals, milk only, extra entrees, vended meals sold under a joint agreement, catered meals, vending machines, etc.)
- **CACFP** - daycare and supper meals claimed under Child and Adult Care Food Program.
- **SFSP** - meals claimed in Summer Food Service Program.

The [new SY 16-17 Annual Financial Report instructions](#) are located on [DPI SNT Financial Management webpage](#).

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](#). For a more comprehensive overview, see [SP 58-2016: Unpaid Meal Charges Guidance](#). In addition, 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, as noted in [SP57-2016 Unpaid Meal Charges Guidance](#).

Paid Lunch Equity (PLE)

The SFA is in compliance with PLE. The SY 2017-18 PLE Tool was completed together on-site.

Revenue from Nonprogram Foods

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
- Vending Machines operated by Food Service

The SFA flagged for a comprehensive resource management review in the *Revenue from Nonprogram Foods* section as it sells extra milk and adult meals. SFAs that sell **only nonprogram milk** and **adult meals** as nonprogram foods, like Grace Lutheran Evangelical, are exempt from completing the USDA Nonprogram Food Revenue tool. However, SFAs like this are still required to separate out nonprogram milk and adult meal costs from program costs and nonprogram milk and adult meal revenues from program revenues to demonstrate the expenses associated with the milk and adult meals are covered by the revenue collected. It was determined that Grace Lutheran Evangelical sells milk to its students at a price (\$0.35/carton) less than its expense (~\$0.40/carton). The SFA is not in compliance with nonprogram foods. The SFA must either raise its milk prices to cover milk expenses *or* the SFA must determine the total shortfall for the school year and make a transfer from an outside fund to the food service fund. Please see the *Finding* and *Corrective Action* below that addresses this issue.

Indirect Costs

As a reminder, DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.

Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:

- Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
- Utility charges - separately metered or current usage study by the local utility company.
- Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

Finding #6: Grace Lutheran Evangelical sells milk at a price (\$0.35/carton) less than its expense (~\$0.40/carton). The SFA is not in compliance with nonprogram foods.

Corrective Action Required: The SFA must either raise its milk prices to cover milk expenses *or* the SFA must determine the total shortfall for the school year and make a transfer from an outside fund to the food service fund. Please provide a summary detailing the intent of the SFA.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Non-discrimination Statement

As a reminder, if the SFA develops letters for use in communicating to households about USDA Child Nutrition Programs, the documents should contain all of the information included on the DPI template letters including the full USDA Non-discrimination statement, which is available on the DPI SNT [Civil Rights webpage](#). When space is limited, such as on printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as other text in the document.

And Justice for All Poster

An “And Justice for All” poster was available and readable in the cafeteria.

Civil Rights Training

The SFA did not complete the annual civil rights training. Please see the *Finding* and *Corrective Action* below that addresses this issue.

Civil Rights Self-Compliance Form

The Civil Rights Self-Evaluation Compliance form was completed by October 31st.

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 practitioner. SFAs may use the [template Medical Statement Form](#) posted on the [DPI SNT Special Dietary Needs webpage](#) if a student’s IEP does not include language regarding accommodations for meals, as noted in the [Questions and Answers Regarding USDA Memo SP 59-2016](#). The template is also available in Spanish and Hmong. SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner.

School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA still have a completed [Medical Statement Form](#) on file from a medical authority, such as a school nurse, to support the request. These types of accommodations must be made according to the USDA’s meal pattern requirements in order for the meals to be claimed for reimbursement. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure all requests are being handled equitably.

Processes for complaints

Schools must have a process for receiving and processing complaints alleging discrimination within USDA Child Nutrition Programs. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the SFA must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. 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 [USDA Program Discrimination Complaint Form](#) is available to assist in filing these complaints and can be found on the [DPI SNT Civil Rights webpage](#).

Local Wellness Policy (LWP)

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires SFAs to begin developing a revised local school wellness policy during SY 16-17 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the 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. SFAs 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 (triennial assessment) to determine compliance with the policy, how the policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the triennial assessment, as well as the wellness policy and any updates to the policy, available to the public.

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>.

The SFA's Local Wellness Policy (LWP) was reviewed and the SFA is reminded of the following:

- SFAs are required to identify the official responsible for oversight of the LWP. SFAs may elect to include the position/title of the individual instead of a specific name.
- SFAs are required to permit certain groups to participate in the development, implementation, review and update of the LWP.
- Food and beverage marketing guidelines should be included in the LWP, specifically noting that SFAs may only market products that adhere to Smart Snacks during the school day.
- The LWP should contain language regarding Smart Snack Standards
- Language should be included regarding the triennial assessment and how the public will be made aware of the contents of the LWP, implementation, and results of the LWP assessment.

Smart Snacks in Schools

Please keep in mind that all foods (vending machines, a la carte, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the Smart Snacks rule that went into effect on July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. Exempt fundraisers cannot exceed two consecutive weeks in length and cannot occur in the meal service area during meal time.

A beverage vending machine is preset in the cafeteria at Grace Evangelical Lutheran Church. The vending machine is on and functioning during the school day, but there is a sign that states that no purchases may be made during school hours. While no purchases from the vending machine were observed, it is encouraged that the machine is turned off between midnight and 30 minutes after the end of the school day to ensure compliance with the regulations.

Please see the *Findings* and *Corrective Actions* below that addresses Smart Snacks.

Professional Standards

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. 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.

The SFA is in compliance with Professional Standards regulations for the SY16-17. Technical assistance was provided to the FSD to maintain a continuing education log of all staff to determine compliance with the regulation at-a-glance. The continuing education log should include the name of staff person, date hired, title/position, brief list of core responsibilities, status (full, part-time, volunteer, etc.), and professional standards position (director, manager or staff).

Training requirements for all staff are as follows:

	School Nutrition Program Directors* Category 1	School Nutrition Program Managers* Category 1	Full Time School Nutrition Program Staff* Category 1	Part Time School Nutrition Program Staff or Non-School Nutrition Program Staff with Job Duties Pertaining to School Nutrition Programs* Category 1 or 2
School Year 2015-16	8 hours	6 hours	4 hours	4 hours
School Year 2016-17	12 hours	10 hours	6 hours	4 hours

*Note: If hired January 1 or later, only half of the hours is required during first school year of employment.

If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment. Additionally, in terms of Professional Standards, full time is >20 hours per week while part-time is <20 hours/week.

Water

Water was available at lunch via a drinking fountain in the cafeteria. The SFA is encouraged to provide drinking cups to encourage water consumption.

Food Safety and Storage

Food Safety Inspections

The most recent food safety inspection was posted and available for review. Thank you to the SFA for prompt movement of the inspection to public view.

Food Safety Plan

The food safety plan was available for review.

Temperature Logs

Temperature logs were reviewed. The SFA is encouraged to post current logs on each respective unit to assist in organization and completion of the logs. Staff on-site noted completion of the [Employee Health Reporting Agreement](#) but that the completed form was returned to the vendor. The SFA should retain a completed copy of the Employee Health Reporting Agreement.

Storage

The SFA vends meal. On-site storage is limited but the refrigerator and freezer were reviewed. Items are date stamped. No issues were noted.

Buy American

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in school meal programs as well as supports the local economy. 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.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

SFAs must monitor contractor performance to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. This is accomplished by ensuring the product label designates the United States, or its territories, as the country of origin. Therefore, SFAs must ensure that products delivered comply with any Buy American contract provisions by reviewing products and/or delivery invoices/receipts to identify the country of origin is the United States or its territories. SFAs also need to conduct a periodic review of storage facilities, freezers, refrigerators, dry storage, and warehouses to ensure products comply with the Buy American provision, unless a limited exception has been approved.

The SFA should include Buy American language in its vended meals contract. Additionally, the SFA should work with its vendor who should in turn work with their distributor(s) to see if products are available domestically. If not, documentation requested in the [Non-compliant Product List](#) should be obtained. Please note, the use of this form is the exception, not the rule. More information on this new requirement can be found on the [DPI SNT Procurement webpage](#). The SFA is encouraged to ask questions on this regulation during their Procurement Review.

No non-compliant products were noted at the SFA during the on-site.

Reporting and Recordkeeping

Thank you to the SFA for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner. As the SFA is in its second year of operation in the National School Lunch Program (NSLP), technical assistance was provided during the on-site regarding the requirement to maintain records for the current school year plus three years prior.

Summer Food Service Program (SFSP) Outreach

As part of the National School Lunch Program (NSLP), it is requirement to complete SFSP outreach. The purpose is to inform students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Options for outreach include informing families via email and/or newsletter about the availability of free summer meals via the [Summer Meals Map](#), the option to call 2-1-1 to connect with local health and humans services, the option to text ‘food’ to 877-877, and/or [posting free SFSP posters](#) in the SFA. For more information on Summer Food Service Program, please contact:

Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
Phone: 608.266.7124
E-mail: amy.kolano@dpi.wi.gov

Finding #7: The SFA did not complete the annual civil rights training.

Corrective Action Required: The [annual Civil Rights training](#) and [attendance log](#) can be found on the [DPI SNT Civil Rights webpage](#). Please review and provide a statement of how the SFA will ensure completion of the training for SY17-18.

Finding #8: The student council is selling concessions one Friday a month, immediately after school. Items being sold include: fruit snacks, animal crackers, chips, pop tarts, candy (Hershey’s, Kit Kat, Reese’s, Snickers, Skittles, Laffy Taffy), soda (Mountain Dew, Orange, Sprite, Root Beer, Coca Cola), juice boxes and water. The majority of these items are not in compliance with the Smart Snack regulations.

Corrective Action Required: Please submit a written statement describing your plan to ensure these fundraisers are in compliance with regulations and the timeline in which the changes will occur. Some possible options include:

1. Moving the time of the fundraiser to begin 30 minutes after the school day has ended.
2. Changing the items being sold to compliant food items (the product calculator should be completed for each item and kept on file as documentation).
3. Changing the items being sold to only non-food items.
4. Only operating the fundraiser twice each school year for a maximum of two consecutive weeks each time.

Finding #9: Both exempt and non-exempt fundraisers should be tracked to document compliance with the regulations. Optional tracking tools are available on the [DPI Smart Snacks webpage](#).

Corrective Action Required: The bread was substituted with a whole grain-rich product prior to service. No further action is needed.

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](#).

