

# USDA Child Nutrition Programs Administrative Review Summary Report

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**School Food Authority: St. Jerome School**

**Agency Code: 67-7495**

**School(s) Reviewed: St. Jerome School**

**Review Date(s): 3/22/17-3/23/17**

**Date of Exit Conference: 3/23/17**

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

## **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. I recommend the agencies Authorized Representative and support staff who have roles within the program operation look into the following course: Free and Reduced/Verification, and Financial Basics. 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](http://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](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- 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 governed at the SFA level. The policy may apply consistently for all age/grade groups or vary based on student age/grade groups. For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a "Nutshell": <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>. For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter

- Sample robo-call script
- 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. SP 57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.

**Appreciation/Commendations/Noteworthy Initiatives:**

Sincere thank you to the staff at St. Jerome School for the courtesies extended to the State Agency during the on-site review. Staff were available to answer questions and were receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions, as well as pulling records in preparation for the on-site portion of the review. You were a pleasure to work with.

**REVIEW AREAS**

**1. MEAL ACCESS AND REIMBURSEMENT**

**Commendations**

Applications are processed and the families notified of their status in a timely fashion, well within the required 10 operating days.

**Comments/Technical Assistance/Compliance Reminders**

**Certification and Benefit Issuance**

15 eligibility determinations were reviewed, 2 errors were identified.

**Applications**

- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official. For direct certification, the run date of the file is the effective eligibility date.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, you should not convert it to annual, but using the Income Eligibility Guidelines (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility-guidelines-1617.doc>), you would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- When the benefit status increases, the change must take place within 3 days. When benefit status decreases, the change cannot take place before 10 calendar days written advance notice of adverse action is sent with appeal rights.
- 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. Any application that does not have this box completed is considered an incomplete application.

- Households may choose to decline meal benefits.

#### Direct Certification:

- LEAs must conduct direct certification for the full enrollment at least three times during the school year- which the agency has done. More frequent direct certification efforts are encouraged. At minimum, direct certification must occur:
  - At or around the beginning of the school year;
  - Three months after the beginning of the school year; and
  - Six months after the beginning of the school year.

The first direct certification run was completed on 9/23, which is after the start of school on 8/29. Households did complete free and reduced applications early in the school year and then later matched to direct certification. I highly recommend the agency complete their first direct certification run any time after July 1 for the upcoming school year, but prior to the first day of school. This will eliminate the need for households to complete free and reduced applications if they have been notified as matching to direct certification. In addition, this may reduce a financial burden to the households not covered by carryover and assist in managing unpaid meal charges accruing during the time that students are not approved for free and reduced meals (e.g., operating days 8/29-9/22).

#### Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year.
- St. Jerome School had a 13.33% error rate from SFA-1 and will be required to conduct a second review of applications in the following school year. More information on this requirement is found in the Eligibility Manual. You will also receive a SNT memo in June with more information.

#### Disclosure

- The information provided by families on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-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 SNT webpage <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc>.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template disclosure form is located on the SNT website <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.

#### **Verification**

- Roles of the confirming, verifying, and hearing officials were clarified onsite. The confirmation review did take place, but was not conducted by the person listed on the online contract. The confirmation review was conducted by the hearing official, which is unallowable. The hearing official cannot be involved in any other part of the application approval/verification process.

Moving forward, the confirmation review will be conducted by the individual listed on the online contract.

- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to pg. 81 of the current Eligibility Manual: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-2016.pdf>

### **Meal Counting and Claiming**

- Consider offering reimbursable meals to all students provided during a field trip. DPI has posted a Field Trip resource page, which covers the meal pattern, forecasts counts, point of service counts, and standard operating procedures for food safety. It is available on our website under NSLP, then meal planning: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/field-trip-meals-templates.doc>
- Please review the *General Annual School Nutrition Program Calendar or Requirements*: <https://dpi.wi.gov/school-nutrition/calendar-of-requirements>, which covers reporting and claiming deadlines. The agency was placed in online claims withholding for late submission of the 2015-16 SY Annual Financial Report- due August 31. Reimbursement was lost for the months of October and November 2016. The AFR was submitted in January during the offsite review. The SA worked with staff onsite to file a one-time exemption in hopes to recover or one months’ reimbursement.
  - Claims for reimbursement for meals/milk served under the NSLP must be submitted to DPI on-line for payment within 60 calendar days after the end of the claiming period. Only one claim per program is accepted per payment processing period. If you are in online claims withholding for any reason, you must still meet these deadlines. Submit a paper claim via fax or email to our accountant. If the claiming deadlines are not adhered to, the agency forfeits reimbursement. Only one exception will be granted per program every 36 months. The Federal and State Grants Program of DPI must approve all exception corrective action plans.
- Back out counts are unallowable (e.g., total counts- free and reduced counts= paid count). Meals must be counted in each category separately as free, reduced, and paid.
- Vendor staff may not complete the point of service count. This is the responsibility of the SFA.

### **Findings and Corrective Action Needed**

#### **Certification and Benefit Issuance**

- Finding #1:** Students listed on the SFA-1 form are incorrectly certified for meal benefits. Income is over the requirement for the free category.

**Corrective Action Needed:** Notify the household of the reduction in benefits (to take effect 10 calendar days from the date they are notified in writing). The DPI adverse action template (shared onsite via email) can be used to communicate this change.

Record the date that corrective action is taken on the **SFA-1** form and send a completed copy of this form along with the updated benefits issuance list to the consultant.

- Finding #2:** Families that matched to direct certification have not been notified in writing. Per pg. 57 of the EM, agencies must notify the household about eligibility established through direct certification. The notification must include the following information:
  - The child is eligible for free benefits;

- No further application is necessary;
- An explanation of extended eligibility and how to notify the LEA of any additional children in the household not listed on the notification; and
- How to notify the LEA if free benefits for directly certified children are not wanted.

Consider using the template posted on our Free and Reduced Meal website:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter-1617.doc>

**Corrective Action Needed:** Notify the families that have matched to direct certification in writing. Submit a written statement to the consultant via email outlining how the agency will handle DC match notifications in future school years.

### Verification

- ❑ **Finding #1:** The application selected as part of verification should *not* have been included in the verification pool as of October 1 because the household matched to direct certification prior.

Additionally, the SNAP award letter submitted by the household to support the case number on the application was not current. Documentation supporting a case number on an application may be provided from “...any point in time between the month prior to application and the time the household is required to provide income documentation”.

**Corrective Action Needed:** By signing this report, the agency agrees to remove direct certification from the verification pool and obtain supporting documentation from the above timeframe.

Review the webcast on Verification: <http://media.dpi.wi.gov/school-nutrition/verification-process/story.html> and submit a copy of the certificate of completion. These hours can count towards Professional Standards.

- ❑ **Finding #2:** Section 3-2 of the Verification Collection Report (VCR) was not completed correctly. All students approved as free eligible through SNAP and not subject to verification must be reported. Section 3 was left blank and all certifications reported under Section 4 (students approved for Free and Reduced Applications). This report has been submitted to USDA and can no longer be amended.

**Corrective Action Needed:** Review the webcast titled: [Submitting the Verification Collection Report](#). Send a copy of the certificate of completion to the consultant. For future reference, please use the step-by-step VCR instructions when submitted the report:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-report-instructions.docx>.

These hours can count towards Professional Standards.

### Meal Counting and Claiming

- ❑ **Finding #1:** The agency is not using an edit check prior to submitting the NSLP claim for reimbursement.

**Corrective Action Needed:** Begin conducting a monthly edit check prior to online claim submission: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc>. 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. Making a couple additions to the agencies current system/excel form was discussed onsite. You may add a column for the paid category and write in calculations on the bottom of the form for the attendance factor and adjusted eligibles.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to Taher for providing all necessary documentation prior to the review and to the staff on-site at St. Jerome for working with me and answering additional questions. Everyone was easy to work with and provided responses in a timely manner. You are doing a great job serving the students at St. Jerome's!

### Comments/Technical Assistance/Compliance Reminders

#### Standardized recipes:

- There was some consistency lacking in some of the standardized recipes. For example, on the cheesy potatoes recipe, the ingredient amounts listed did not match up with what was indicated in the directions section. Depending on which amounts were followed, the recipe would credit differently. It is essential that standardized recipes are clear and provide all of the necessary information to ensure that the recipe produces the same results each time it is prepared.
- It was unclear what form some ingredient amounts were provided for. For example, the Cheesy bean quesadilla calls for 3.35lbs of great northern beans. However, the recipe does not indicate if that is the drained weight or the as purchased weight of the beans. Adding this clarification on the recipes will help to ensure they are prepared accurately.

#### Production records:

- Currently, the production records being used do not document all of the required information. While there is not a certain 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>.
  - 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.
- There is a space on the current production record to document the daily and weekly minimum meat/meat alternate and grain offerings. While it is not required to include this information on the production record, it is a nice way to double check that the planned menu is meeting meal pattern requirements. However, this is not being filled out correctly. Currently, the total amount of meat/meat alternate and grains offered if the student was allowed to select both entrée options is filled in. Instead, the staff member completing the records should look at both menu options and determine which would provide the daily minimum.
  - For example, the Philly flatbread provides 2.5 oz eq m/ma and 2 oz eq of grain and the chicken nuggets/dinner roll option provides 2 oz eq m/ma and 3 oz eq of grain. Therefore, the daily minimum for m/ma would be 2.0 oz eq and the daily minimum for grain would be 2 oz eq.

#### 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 labels directly from product packaging. Records should be reviewed and updated at least 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.

### **Findings and Corrective Action Needed**

❑ **Finding #1:** On the standardized recipe for cheesy potatoes, the ingredient amounts in the recipe don't match up with what is listed in the directions section. For example, the recipe calls for 1.7lbs cheddar and 1.7lbs mozzarella (total 3.4lbs) for 3.5 pans/110 servings. The directions have ½ lb. each cheese per pan which would be a total of 3.5lbs (1.75# of each cheese). Depending on which quantity is used, the crediting comes out differently.

**Corrective Action Needed:** Please provide an updated standardized recipe for the cheesy potatoes.

### **3. RESOURCE MANAGEMENT**

#### **Commendations**

- Adult meal prices are set adequately.
- Student paid lunch prices are set with consideration for Paid Lunch Equity while using the paid per meal reimbursement to keep the charge as low as possible to the households.
- Ala carte pricing for extra entrees and extra milk is set high enough to cover all cost.

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

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

- Based on the Annual Financial Report (AFR) submitted, it appeared as though the agency ended the 2015-16 SY in the red. Upon further discussion and once the agencies corrects its AFR, the report shows an excess cash balance. As a reminder, SFAs must limit the net cash resources in order to not exceed three months average expenditures. The agency has been working to spend down this balance with the purchase of a milk cooler and microwave. You may receive a communication from the assistant director requesting a spend down plan. Consider eliminating the reduced price lunch charge, or adding administrative labor to assist in program reporting and administration.

##### **Annual Financial Report (AFR):**

- 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. For St. Jerome the programs are NSLP and nonprogram foods. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- Items noted during the review of the AFR that should be addressed when tracking revenues and expenditures moving forward include:
  - Student payments (from free and reduced) are only considered revenues after the meal has been *sold* to the student.

- Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. For St. Jerome, this would include extra entrees, extra milk, and adult meals. In the 16-17 SY this column will be called “nonprogram foods”.
- The ending balance on June 30 from the previous year must be the beginning balance on July 1 for the current year.

### **Revenue from Nonprogram Foods**

- All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program Food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The DPI Nonprogram Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>.
- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) should be used to determine 2017-18 SY prices because rates are not released until July 1 of each year.

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

#### **Comprehensive Review- Maintenance of the Nonprofit School Food Service Account**

- ❑ **Finding #1:** The Annual Financial Report (AFR) was not completed correctly and submitted after the August 31 deadline.

#### **Corrective Action Needed:**

- 1) Correct the 2015-16 SY AFR. Submit an updated paper copy (email or fax) to our accountant Jacque Jordee. Report the correct beginning and ending fund balances. Report all revenues and expenditures from July 1, 2015-June 30, 2016.
- 2) By signing this report the agency agrees to submit the AFR by August 31 each year.

#### **Comprehensive Review- Revenue from Nonprogram Foods**

- ❑ **Finding #2:** The agency did not complete the nonprogram food revenue ratio tool.

**Corrective Action Needed:** Select 5 consecutive operating days for nonprogram and program food sales from the 2016-17 SY. Complete the USDA or DPI tool to document compliance and submit to the consultant.

## 4. GENERAL PROGRAM COMPLIANCE

### Commendations

- Students are allowed ample time to eat lunch. There is no set lunch period length, students choose when they are finished and head outside for recess thereafter.
- The kitchen prep and service areas are clean and tidy. It is obvious that the food service staff take great pride in preparing meals, keeping temperatures/logs, and following other necessary food safety practices.

### Comments/Technical Assistance/Compliance Reminders:

#### **Civil Rights**

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

#### Special Dietary Needs

##### Fluid Milk Substitute

If providing a fluid milk substitute for students who are lactose intolerant, it cannot be juice, unless based on a medical statement signed by a medical practitioner. Water is available to all students, a lactose free milk could be offered or you can provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide us the nutritional panel from the product you will be using. For more information on fluid milk substitutes, <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.

##### Medical Statement

DPI has updated the Medical Statement Form posted on our website that you may use <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>.

When the form is completed and signed by a licensed medical practitioner, the school is required to provide a meal that meets the child's needs as documented. The meal would not have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child.

It is recommended that the agency utilize DPI's template. The current local medical statement does not include all the required information. A signed medical statement must include:

- A description of the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, and
- An explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted).

Schools are not required to accommodate requests that are not supported by a signed statement from a licensed medical practitioner. Schools may accommodate non-disability requests if they choose to as long as accommodations are made within the meal pattern requirements. SFAs must ensure that accommodations are provided to all students equally.

For more information on this topic, see the recently posted Wisconsin Q&A:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/q-and-a-sp-59-2016.pdf>

## **Local Wellness Policy (LWP)**

The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 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.

### 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:

[https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary\\_finalrule.pdf](https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/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 agencies wellness policy is out of date and missing some of the required content areas. This current policy was discussed onsite. A checklist with reviewer feedback in key areas was provided.

### **Smart Snacks in Schools**

All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that is effective 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 only food items sold at St. Jerome School to students during the school day are extra milk and extra entrees, which are compliant.

### **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.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management. For St. Jerome School, this is the current principal.
- If in the future, a new director is hired, the standards for SFA directors are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>.
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.
- Training obtained since April 1, 2015 may count towards training requirements. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

### **Food Safety, Storage and Buy American**

- The Food Safety Plan was available for review. Temperature logs, calibration logs and sanitizing solution logs were up to date.
- Thank you for maintaining a Food Safety plan with equipment, food processes 1-2-3 and Standard Operating Procedures (SOP).
- All food service employees have a signed Employee Reporting Agreement on file.
- As a reminder, when using the Milk Barrel SOP, the time and temperatures of the barrel and milk must be recorded on the temperature monitoring log. If the temperature of the milk cartons in the barrel registers above 41° F the half-pints of milk remaining in the barrel must be discarded and may not be returned to stock.

## 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 the school meal programs. Purchasing from these entities also 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. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

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.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

- Items reviewed as part of Buy American were compliant.

## SFSP Outreach

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at St. Jerome, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) on the [DPI Summer Meals website](#)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
- Promotion of the USDA Summer Food website  
<http://www.fns.usda.gov/summerfoodrocks>.

For more information on Summer Feeding options contact:

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

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

- Finding #1:** The agency has not had food safety inspections yet this school year and does not have documentation to indicate they were requested.

Every school operating USDA School Child Nutrition programs, must have two food safety inspections during each school year, one in the fall of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site’s Food Safety Plan.

**Corrective Action Needed:** Contact your local sanitarian via email requesting two inspections for SY 16-17. Copy the consultant on the communication.

**Finding #2:** The public release was not sent to a local media outlet. It was posted in the parish bulletin.

**Corrective Action Needed:** By signing this report, the agencies agrees to submit the public release to a media outlet in addition to a grass roots organization. You do not have to pay to have it published, but it is an allowable expense to the food service account.

**Finding #3:** Annual civil rights training was not completed by the food service director/authorized representative and staff working with claim submission.

**Corrective Action Needed:** Review the civil rights PowerPoint:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>, sign off on the training record: [https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cr\\_trn\\_log.doc](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cr_trn_log.doc) and submit a copy to the consultant. Annual civil rights training can count towards Professional Standards hours.

**Finding #4:** Staff are not tracking annual professional standards training hours. The director must have 12 hours per year. Individuals working outside of food service, but whom have responsibilities pertaining to key program operations, like submitting claims and conducting the financials should have training in job specific areas (claiming manual, AFR instructions, etc.). Taher kitchen staff did have training hours documented in job specific areas.

**Corrective Action Needed:** Submit a tracking tool:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls> outlining the completed training hours thus far in 2016-17 SY.

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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](http://dpi.wi.gov/statesupt/agenda-2017).

