

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. Paul School

Agency Code: 677806

School(s) Reviewed: St. Paul School

Review Date(s): 2/6/17-2/7/17

Date of Exit Conference: 2/7/17

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:

- 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. Paul School for the courtesies extended to the reviewers both offsite and onsite. Staff were available to answer questions and provided additional information as needed. In addition, thank you for taking the time to pull records for the on-site portion of the review. The lunch coordinator's organization and efforts did not go without notice!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- Applications are reviewed in a timely manner. An eligibility determination is made, the family notified of their status, and the status implemented well within the required timeframe of 10 operating days.
- Direct certification is ran as required and more often to increase student matches.

- Thank you for using the DPI prototype letters with the current non-discrimination statement.

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- 7 eligibility determinations were reviewed, 0 errors were identified. Great job!

Applications

When an application has multiple frequencies of income reported (e.g., weekly, bi-weekly, monthly), these incomes must be converted to an *annual* amount. If similar income frequencies are reported, the application must be determined in the common frequency.

Transferring Students

- When a child transfers to St. Paul School from an outside agency, St. Paul can accept the eligibility determination from the child's former school, if the child has an individual eligibility determination. Obtain a copy of the source document (application or direct certification list).

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. Paul School had a 0% certification error rate and will not be required to conduct a second review of applications in the following school year.

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

No errors, great job!

Meal Counting and Claiming

No errors, great job!

- The edit check is used monthly, as intended- checking meal participation by category against attendance adjusted eligibles.
- Please note that SFAs may claim visiting students in the paid category or their individual category with supporting source documentation.

- Consider modifying/simplifying the point of service system to only enter meal participation numbers into the software system after lunch is served. Currently, the SFA inputs lunch forecast numbers into Pocket Lunch before service and then manually adjusts these numbers to obtain meals counts after lunch service based on point of service tickets. St. Paul is claiming based on the adjusted point of service ticket count, which seems to work for the agency. Forecast numbers can still be obtained separate from participation counts. As a general reminder, forecast counts may never be used alone as the basis for the monthly claim.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

- Thank you for using the DPI lunch signage! It is easy to read and students understand what they can take to build a reimbursable meal.
- Staff and meal service volunteers positively interact with the students as they go through the line. Vegetables are encouraged off the garden bar, and student freely request them.

Comments/Technical Assistance/Compliance Reminders

Although you are purchasing meals through a joint agreement, it is ultimately up to the SFA to ensure all meal pattern requirements are met. Meal pattern requirements are available at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>.

Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Please stay tuned on our webpage for current and upcoming opportunities <http://dpi.wi.gov/school-nutrition/training>. Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year.

We offer summer training and will be hosting classes in downtown Madison July 25-27, 2017 and at Alverno College in Milwaukee during August 8-10, 2017. Please plan on attending this great opportunity.

Findings and Corrective Action Needed

- ❑ **Finding #1:** The documentation provided for the dinner roll served with the Oven Baked Chicken on January 11 was not whole grain-rich. The documentation provided for the Garlic Toast served with Spaghetti and Meatballs on January 12 also did not credit as whole grain-rich. The first ingredient listed on the Alpha Baking Company spec sheet and the New York Garlic Toast label was “Enriched Wheat Flour”. All grains offered in school meal programs are required to be whole grain-rich. Grains that are not whole grain-rich cannot be credited toward the grain component. Please replace all enriched grain products with whole grain-rich versions.

Corrective Action Needed: Please find a different bun product that is whole grain-rich to serve to students. I recommend searching for both 1 oz eq and 2 oz eq options. Please also find a substitute for the garlic toast that is whole grain-rich. Send the labels to the public health nutritionist.

- ❑ **Finding #2:** There was a weekly grain shortage for the planned menu of January 9-13, 2017. This is due to entrees providing 1 oz eq grain being offered daily to students which only contributes 5 oz eq to the weekly grain total. The requirement for the K-8 age group at St. Paul School is at least 8 oz eq weekly.

Corrective Action Needed: In order to remedy the weekly grain component shortage, multiple entrees that contribute 1 oz eq of grain need to be increased to credit as 2 oz eq. For example, the yogurt parfait needs to be planned to provide 2 oz eq grain daily, which requires the portion size of granola to be 2 ounces by weight of ½ cup of granola per parfait.

Throughout any week of schools lunches, only 2 days per week can an entrée contribute 1 oz eq of grain. For the remaining three days all entrees provided need to credit as at least 2.0 oz eq of grain in order to meet the weekly grains component of 8 oz eq.

Note: This is a vital aspect of the National School Lunch Program to understand, as this finding on subsequent Administrative Reviews will result in fiscal action.

Please complete a menu planning worksheet for a future week in February or March and send to the Public Health Nutritionist by March 8, 2017.

Menu planning worksheets can be found here: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>

Finding #3: There was a weekly meat/ meat alternate shortage for the planned menu of January 9-13, 2017. The weekly total for St. Paul School showed 8.5 oz eq, instead of the required 9 oz eq weekly minimum for the meat/meat alternate component. This is due to entrees providing less than 2 oz eq meat/meat alternate being offered more than one time per week to students.

The week of review showed three of the five days contributing 2 oz eq meat/meat alternate to the weekly requirement of 9 servings. If one additional day had contributed 2 oz eq meat/meat alternate, that shortage would be resolved. Increasing the portion size of sausage links from 1 to 2 or increasing the portion size of meatballs from 4 to 5 would resolve this issue.

Corrective Action Needed: In order to ensure this concept is fully mastered, please complete a menu planning worksheet for a future week in February or March and send to the Public Health Nutritionist by March 8, 2017.

Menu planning worksheets can be found here: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>

3. RESOURCE MANAGEMENT

Commendations

- Cold lunch milk and milk consumed during break are well tracked. The agency is charging sufficiently to cover the cost per carton.
- PLE is completed and the agency is at equity. Great job!

Comments/Technical Assistance/Compliance Reminders

Nonprofit School Food Service Account

Annual Financial Report:

- 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>
- Under “Ala Carte”, the agency should have reported expenses for any food items served to students that are not claimed as part of the reimbursable meal. For St. Paul School, this is adult

meals, milk consumed at break, and cold lunch milk. Revenues and expenses from adult meals will need to be pulled out of NSLP and included in this category. In the 2016-17 SY, the “Ala Carte column” will be broken out further and the items noted above will all fall under “nonprogram foods”.

Revenue from Nonprogram Foods

- **Nonprogram Foods Revenue Rule SP-20-2016**
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
- 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.
- SFAs, like St. Paul School that sell **only nonprogram milk** and **adult meals** as nonprogram foods are exempt from completing the USDA Nonprogram Food Revenue tool.
- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. St. Paul School is in compliance with this regulation.

Upon review of agency’s joint agreement, reviewer noted a substantial upcharge for adult meals in comparison to the fixed student rate (\$3.10 vs. \$2.40). However, the receiving agency is not supplied with portions/menu items that differ from the students’ planned menu. I encourage the agency to renegotiate this charge. The increased rate for adult meals to cover the per meal student reimbursement and payments (as noted above) is taken care of on the *front-end* through St. Paul School’s point of service and tracking system- not through the fixed meal rates within the joint agreement.

4. GENERAL PROGRAM COMPLIANCE

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

- Civil rights training has been completed by all frontline staff and documentation was available for review.

Special Dietary Needs

- All food substitutions for children with disabilities must be documented by a *licensed medical Practitioner* (Physician, Dentist, Nurse Practitioner, Podiatrist, Physician Assistant, and Optometrist). We have a prototype Medical Statement Form posted on our website that is also available in Spanish and Hmong that you can use. When the form is completed indicating that the special dietary request is based on a disability, 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. Additional information on Special Dietary Needs can be found on the DPI School Nutrition Team website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.

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 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. I recommend the agency update and implement the policy agency-wide, rather than placing the sole responsibility on food service. Food service should only be a part of the agencies overall school health environment goals and objectives. Consider incorporating this update into curriculum and having students contribute to the review and update with adult oversight.

Content of the Wellness Policy

At a minimum the wellness policy must include:

**items marked with an asterisk are missing or not fully addressed from the current agency policy*

- 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. 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>.

Smart Snacks in Schools

- The only item St. Paul School sells to students on the school campus, during the school day is extra milk. The student do not have access to a staff vending machine, and the agency does not hold food fundraisers intended for consumption during the school day. If this changes, review the “Smart Snacks” regulation 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>.

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. For St. Paul School, the director must have at a minimum of a High School Diploma and at least 1 year of relevant school nutrition experience. The food lunch coordinator does fit this requirement.
- 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.
- 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.
- 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>.

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	*Part Time Staff
	(20 hrs. or more/week)	(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

Food Safety, Storage and Buy American

- The most recent food safety inspection report was clearly posted and in public view.
- Temperature logs were complete and available for review.
- The agency uses time as a temperature control.
- The Food Safety Plan is site specific and reviewer noted dates the plan was reviewed and updates were made. Process 1, 2, and 3 categorization is noted on the transport sheet.

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 and 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.

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.

Of the limited items stored at St. Paul School, no violations were noted. Additional review in this area will be conducted at the school supplying the bulk of St. Paul School’s food.

Reporting and Recordkeeping

Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

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. Paul School, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge.

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>.

To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

Finding #1: The agency did not submit the public release to a grassroots organization. It was submitted to a local media outlet as required.

Corrective Action Needed: By signing this report, you agree to send the Public Release to at least one grassroots organization (e.g., library, WIC clinic, food pantry) in addition to the media outlet in future years. Also consider any employers in your area contemplating layoffs. **No further corrective action needed.**

Finding #2: The agency does not have a designated ‘director’ and is not formally tracking annual training hours by the required areas in a central location. All staff working with the food service program must be included. Civil Rights (2330), Blood borne Pathogen training, First Aid and CPR (3450), Emergency/Disaster plans (3240) and Food Safety (2630) may be counted.

Corrective Action Needed: Designate a director and submit a tracking tool that includes all staff training hours (director and any outside staff that work with the program) for the 2015-16 and current school year. Staff need training in job specific areas. For example, the determining official needs training related to the eligibility manual/disclosure, volunteers serving meals need training in food safety. The director would need 10 hours for the 2014-15 SY and 12 thereafter. All other staff at St. Paul School just need training in their areas, which may or may not add up to 4 hours of annual training hours.

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.

