

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. Rose School

Agency Code: 68-7881

School(s) Reviewed: St. Rose School

Review Date(s): 12/18/17-12/19/17

Date of Exit Conference: 12/19/17

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:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Rose School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Thirteen eligibility determinations were reviewed, zero errors were identified.

Application Forms/Notification Letters

- Consider using the DPI notification letters for the Approval/Denial of meal benefits, or copy and paste the Approval/Denial letter into your software system to be sure it has the up to date information.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to three of the following places:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed. You may ask to have the public release published as a public service.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- Direct Certification now shows M and Z codes. The M code stands for Medicaid Free. Students that match as an M code are certified to receive Free meals. The Z code stands for Medicaid Reduced. Students that match as a Z code are certified for Reduced-price meals. Please note that if a household qualifies for free meals via a free and reduced meal price application but a student shows up as a Z code, the household is awarded with the better benefit (free meals).
- Households may not write a case number for Medicaid on an application. The only time a case number is acceptable is when it is 10 digits and it is for Food Share or W-2 Cash Benefits.

Verification

Commendations

- Verification was completed before the November 15th deadline.
- The Verification Collection Report was submitted prior to the February 1 deadline correctly.
- The Verifying Official used the DPI “We Must Check” and “We Have Checked” letter templates.

Technical Assistance (TA)/Compliance Reminders

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** One application was selected for Verification and verified incorrectly. The household did not submit all income information needed to verify the application and was changed to free status rather than paid status, originally determined as Reduced.

Corrective Action Needed: Send a notification letter to the family letting them know they have ten days to submit the income documentation to support their original application selected for Verification. If they do not submit information, the student must be changed to paid status at the end of the 10th calendar day from when the letter was mailed out (date on the letter). If the family says their income has changed, they may fill out a new application and submit the proper documentation to support their application. If they submit the proper documentation to support the application, send them a notification letter of this. If they

do not have the proper documentation, follow up and see if you can get that. If you cannot, they will be changed to paid status. **Submit a summary via email of what the outcome was.**

Meal Counting and Claiming

Commendations

The breakfast and lunch claims for November were both submitted perfectly. Keep up the great work!

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Sincere thanks to the business administrative assistant, bookkeeper, principal, and school nutrition professionals of St. Rose St. Mary's School. We appreciate your time and efforts spent participating in the onsite review. We applaud your efforts to serve minimally-processed meals with plenty of fresh fruits and vegetables. Students are encouraged to take what they are hungry for, ensuring reimbursable meals are served while waste is minimized. Adults are positive role-models, participating in the school meals programs and encouraging good manners during the meal period.

Thank you to the school nutrition professionals, who were receptive to feedback, both positive and constructive criticism. Extensive technical assistance was provided onsite to simplify menu planning and improve breakfast and lunch meal pattern compliance. While areas of opportunity remain, all staff at St. Rose St. Mary's School are invested in improving and sustaining the child nutrition programs, which greatly benefit the students.

Technical Assistance (TA)/Compliance Reminders

Production Records

Per the Permanent Agreement with the Department of Public Instruction School Nutrition Team, the School Food Authority (SFA) must maintain accurate production records for all meals claimed for reimbursement. Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Technical assistance was given on using volume measures (such as cups) to record portion sizes of fruits and vegetables, and using weight measures (such as ounces) to record portion sizes of meat/meat alternates and grains.

Child and Adult Care Food Program

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk may not be served. Children one year old should be served unflavored whole milk. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. Discontinue serving fat-free (skim) chocolate milk.

Preschool students are allowed to be served the K-8 menu if they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA. This flexibility may be used in situations in which it would be a challenge for staff to determine during meal service if a

child is in preschool or K-5. During on-site observation, preschool students were served a modified K-8 menu but were not being served at the same time and in the same place as the K-8 students. Children who are not yet in kindergarten must be served the updated CACFP meal pattern if not co-mingled with other age/grade groups at meals.

Offer Versus Serve (OVS) is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service.

Training and additional resources, including meal pattern tables, can be found on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Whole Grain-Rich (WGR)

All grains offered in school meal programs are required to be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. Replace all enriched grain products with whole grain-rich versions. Non-whole grain-rich products identified in storage include Gold Medal basic muffin mix, frozen pizza crust, blueberry bread, Uncle Ben's and Minute white rice, pumpkin pie toaster pastries, Kraft macaroni and cheese, Lender's bagels, and Hospitality buttermilk pancake mix. Furthermore, enriched grain foods cannot count as food items towards the breakfast meal pattern.

Additional information on WGR, including how to determine if a product is WGR, can be found in the [USDA Whole Grain Resource](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#grain) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#grain>).

If the SFA can demonstrate a hardship in procuring, preparing or serving a compliant WGR product that is accepted by students, an exemption can be requested for that specific product. Review the August 23, 2017 memo, "[School Meal Flexibilities for School Year \(SY\) 2017-18](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail082317.pdf)" for more information on the exemption process (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail082317.pdf>). Until an exemption approval has been received, WGR products must continue to be served.

Signage

It is required to post signage visible to the students that indicates the offered components in each meal and tells students what they must select in order for their meals to be considered reimbursable. Breakfast signage should list the three components and the four items offered and must communicate to students that under Offer versus Serve, they must select at least three food items, one of which must be at least ½ cup of fruit, vegetable, or a combination of fruit and vegetable.

Signage is especially helpful when students are self-serving foods, such as lettuce, baby carrots, grapes, blueberries, and yogurt on the garden bar. To better serve students who are still learning to read, consider adding pictures or preparing a model tray with the amounts of fruits and vegetables that the menu planner expects the students to take.

If you are interested in ordering signage from SNT, please visit the [Team Nutrition](https://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

Crediting

The USDA *Food Buying Guide* for School Meals Programs contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods.) Foods that do not have standards of

identity are not listed in the *Food Buying Guide* and require further documentation (a Child Nutrition [CN] label or a product formulation statement [PFS]) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs.

Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for School Meal Programs, it may not be credited when served as part of the USDA School Meal Programs. Additionally, remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the [Meal Pattern Components](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>).

State-Processed Products and USDA Brown-Box Foods have fact sheets, detailing meal pattern contributions. The fact sheets are updated annually. USDA Brown-Box Foods fact sheets are available on [USDA's website](http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) (<http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets>). State-Processed Products fact sheets are available on [SNT USDA Food's webpage](https://dpi.wi.gov/school-nutrition/usda/product-information) (<https://dpi.wi.gov/school-nutrition/usda/product-information>).

Offer versus Serve

Under Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered from the three components (grain [and optional meat/meat alternate], fruit/vegetable, and milk). An item is defined as 8 fluid ounces of milk; ½ cup of fruit and/or vegetable; and 1.0 ounce equivalent (oz. eq.) of grain (and optional meat/meat alternate). Visit the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) page for additional OVS guidance (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). Even when a meat/meat alternate, such as yogurt, is planned, SFAs must still serve daily minimum requirement of 1.0 oz eq of a true grain.

Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements. Although all students observed at took a reimbursable meal, it is important for staff to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) is available on our website (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf).

Standardized Recipes

Use of standardized recipes is another important part of child nutrition programs. Any menu item that has more than one ingredient, such as spaghetti sauce with meat, taco meat, or chicken stir fry, should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Continue to use the resources on the DPI website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the [Menu Planning webpage](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). We

encourage viewing [the webcast, What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

Cycle Menu Recommendation

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

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

Recipes and resources can be found as part of the WI SNT [Cycle Menu Resources](#) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) and on USDA's [What's Cooking?](#) website (whatscooking.fns.usda.gov/).

Meal Pattern Components

The meal pattern for Child Nutrition Programs was updated as part of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 with many of the updates to the National School Lunch (NSLP) and School Breakfast Programs (SBP) being implemented July 1, 2012. The updated meal pattern eliminated the option for nutrient-based menu planning and dictated new age/grade groups for menu planning (grades K-5, 6-8, K-8, and 9-12). Additionally, it required specific daily and weekly minimum offerings be met for meat/meat alternate and grains for each age/grade group. During School Year (SY) 2012-2013 and SY 2013-2014, half of all grains offered had to be whole grain-rich (WGR). However, all grains offered with reimbursable meals must be WGR effective school year 2014-2015. The updated meal pattern created separate components for fruits and vegetables and with weekly requirements outlined for the five required vegetable subgroups (dark green, red/orange, beans/peas, starchy, and other). More information regarding the updated meal pattern can be found at on the [Menu Planning webpage](#) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

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

Dietary Specifications

The updated meal pattern mandated by the HHFKA of 2010 outlined sodium limits using three targets, allowing for a gradual implementation. The first target was implemented on July 1, 2014. Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, olives, and processed food items. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years.

Food products and ingredients used to prepare school lunches must contain zero grams of trans fat per serving (less than 0.5 grams per serving) according to each product's nutrition facts label or manufacturer's specifications. If it is likely that a product's trans fat is naturally occurring (for example, in some meat and dairy products), the school food authority (SFA) must request documentation from the

manufacturer that reports the source of the trans fat prior to using the product. If a label does not specify the trans fat content of a product, the SFA must request additional information prior to serving the product. All products containing synthetic trans fats must be discontinued immediately.

Portion Control

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

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

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

Smart Snacks – Tracking Exempt Fundraisers

Someone in the school, like the business administrative assistant, must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Training

Anyone involved with the school meals program is recommended to attend DPI training classes. Classes are offered in the summer and selected other times throughout the year. Numerous webcast training sessions are also available online. Travel and meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the USDA requirements for the federal nutrition programs including verification, free/reduced applications, menu planning, production records, and record keeping requirements. Information on summer classes will be sent to School Food Authorities in late spring and is also available on the [DPI training](https://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).

Findings and Corrective Action:

Meal Pattern Finding #1: Daily and weekly minimum requirements are not met for grain at lunch during the review period. On Tuesday and Friday, 1/4 cup of spaghetti and 1/4 cup of rice were offered, crediting as 0.5 ounce equivalents (oz eq) each and resulting in 0.5 oz eq shortages of daily minimum requirements. These daily shortages contribute to a 0.5 oz eq shortage of weekly minimum requirements as well.

Required Corrective Action: Submit a statement describing how you will alter the menu to meet the daily and weekly minimum requirements going forward.

Meal Pattern Finding #2: Daily minimum requirements are not met for vegetables during the review period as the result of a missing standardized recipe for spaghetti sauce with meat. One-half cup of vegetables were offered, compared to the daily minimum requirement of 3/4 cup.

Required Corrective Action: Submit a standardized recipe for spaghetti sauce with meat, including (serving size for single portion(s), total number of portions, and total volume or measure [gallons]).

Meal Pattern Finding #3: Weekly vegetable subgroup requirements are not met for beans/peas (legumes) or starchy vegetables during the review period. Quarter-cup servings of refried beans and French fries were offered, compared to the weekly minimum requirements of 1/2 cup each.

Required Corrective Action: Submit a statement describing how you will alter the menu to meet the daily and weekly minimum requirements going forward.

Meal Pattern Finding #4: Gold Medal basic muffin mix, frozen pizza crust, blueberry bread, Uncle Ben's and Minute white rice, pumpkin pie toaster pastries, Kraft macaroni and cheese, Lender's bagels, and Hospitality buttermilk pancake mix are not whole grain-rich products.

Required Corrective Action: Discontinue serving these items. Submit crediting documentation (e.g. Child Nutrition [CN] label, product formulation statement [PFS], complete nutrition facts label with ingredient statement) or standardized recipes as applicable.

Meal Pattern Finding #5: Recipes for apple cinnamon muffins, cinnamon rolls, and pancakes are not standardized to the operation. Recipes for spaghetti sauce with meat, taco meat, and chicken stir fry were not submitted nor provided onsite.

Required Corrective Action: Submit standardized recipes for these six menu items, including (serving size for single portion(s), total number of portions, and total volume or measure [gallons]).

Meal Pattern Finding #6: Staff are not trained on OVS.

Required Corrective Action: Watch the Offer Versus Serve webcast on the [SNT Training webpage](http://dpi.wi.gov/schoolnutrition/training/webcasts#cyc) (<http://dpi.wi.gov/schoolnutrition/training/webcasts#cyc>). Submit a roster or checklist indicating all staff have viewed the webcast.

Meal Pattern Finding #7: Production records for breakfast and lunch for the review period are incomplete. All required information on the template must be documented for all menu items.

Required Corrective Action: Submit one week of completed production records for breakfast and lunch. Include planned portion sizes for all items, as well as all other information on the "must haves" list, which was left onsite.

Meal Pattern Finding #8: Signage was not posted at breakfast to show students what constitutes a reimbursable meal.

Required Corrective Action: Submit a photo of posted breakfast signage, which includes the required 1/2 cup fruit, vegetable, or fruit vegetable combination statement.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance (TA)/Compliance Reminders

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its annual reference period for nonprogram food compliance which is highly recommended. The new [Annual Financial Report instructions](#) are located on the DPI website.
- Be sure to track all revenues and expenditures for Adult meals and milk. To calculate the adult meals food cost, an average of 5 days of food cost should be calculated for breakfast and lunch. This average should be multiplied by how many Adult lunches and breakfasts are sold throughout the year to get the total food cost (expenditure).
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](#) webpage (dpi.wi.gov/nutrition/online-services).

Findings and Corrective Action Needed: Annual Financial Report

- ❑ **Finding #1:** The 16-17 Annual Financial Report needs to be updated to show there were no transfers made to Food Service.

Corrective Action Needed: Update the Annual Financial Report prior to the December 31st deadline. **This was completed on-site. No further action required.**

Unpaid Meal Charge Policy

- St. Rose has an Unpaid Meal Charge Policy, but it needs to be put into writing and clearly communicated with families annually, such as in the Student Handbook.
- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs 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 23-2017: [Unpaid Meal Charges Guidance](#)
<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Paid Lunch Equity (PLE)

Commendations

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. St. Rose ran the PLE tool and raised prices 5 cents instead of the required 10 cents. They used the Split Calculator tab on the PLE tool to calculate how much they had to transfer over to the Food Service Account. The bookkeeper made a donation to the Food Service account to cover the cost of raising the lunch prices 5 more cents.
- Since the school is following a K-8 meal pattern and all students should be receiving the same quantities of food components, each student should be charged the same price for lunch. Consider changing the lunch price to be one price starting for the 18-19 SY.

Revenue from Nonprogram Foods

Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals and cold lunch/extra milk.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

Civil Rights Training

- Civil rights training must be conducted on an annual basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Regarding the 4K student that does not want milk at lunch: since the student is in 4K and has to follow the CACFP meal pattern, he must take a milk unless he has a medical practitioner fill out the special dietary needs form and keep on file at the school. However, the school may accommodate the child by offering a non-dairy unflavored milk substitute if it is nutritionally equivalent to cow’s milk. However,

you need to obtain permission from DPI to serve the milk substitute. If following Family Style service, all components must be offered to the students on the table, but the student doesn't have to take the milk if it's not wanted. However, with the issue of food waste being brought up, you may decide to collect any served/unopened milk and donate it to a local food pantry. Work with your sanitarian to develop an SOP for donating foods and keep this in your Food Safety Plan.

Every Full School Day

- For every day that school is in session for a full day, students must be offered a reimbursable lunch. On the day that the Thanksgiving pot luck is offered free of charge to students, the students must be given the option to take a reimbursable meal. You may have them sign up prior to the Thanksgiving meal so you can prepare for the reimbursable lunches. As long as the students are given the option of having a reimbursable meal, this meets the regulation.

Findings and Corrective Action Needed: Civil Rights

Finding #1: The menus need to have the shortened USDA non-discrimination statement on them. **Corrective Action Needed:** Update the menu for January to have the shortened statement "This institution is an equal opportunity provider" on it. Submit a copy via email.

Local Wellness Policy

Commendations

Thank you for having a wellness policy on file and working to assure students are on the path for a healthy lifestyle.

Technical Assistance (TA)/Compliance Reminders

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)

- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

DPI's Team Nutrition has developed a toolkit and other resources to assist schools with building their [wellness policy](#). Schools can choose from several standardized language options in the toolkit that comply with USDA's regulations and tailor it to their school needs.

Findings and Corrective Action Needed: Wellness Policy

- **Finding #1:** Your SFAs Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Language must be dated to the most current regulations. Feel free to use the [Wellness Policy Builder](#) to create your Local Wellness Policy (LWP). The [Local Wellness Policy Checklist](#) can assist you to make sure you have all of the required elements in the LWP. **Please submit a statement explaining when you plan to have your policy updated and compliant with the final rule.**

Professional Standards

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- 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.
- It was decided that the Administrative Assistant should be the "director" since she is involved with benefit issuance and the claims. She needs 12 hours of training hours each school year (July 1 – June 30).

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- The food service employees that prepare the meals work more than 20 hours per week and should have 6 hours of training per year.
- Staff that spend 20 hours or less on School Nutrition related work should have 4 hours of training each year.
- DPI's School Nutrition Skills Development Courses (SNSDC) are very informative and give you the most up to date information regarding the regulations. You can also network with other schools in the area and talk with DPI staff to answer any questions you may have. The Free/Reduced/Verification

class would be very beneficial to the Director as it goes through the current Free and Reduced Meal Price Application as well as all things regarding Benefit Issuance.

- In addition to the SNSDC classes, you can watch the webcasts on the DPI Training website. They count minute for minute. You may access them [here](#).

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action: Professional Standards

- ❑ **Finding #1:** Staff have not completed the required training hours for the current school year and were unable to provide a training plan for the current school year. Explain how and when the training hours will be completed (classes, webinars, etc.).

Corrective Action Needed: Submit a statement via email explaining how the Director, Food Service Staff, and any other staff involved with the School Nutrition Programs will complete their required training hours for the rest of the year.

- ❑ **Finding #2:** Training is not being monitored on a tracking tool.

Corrective Action Needed: Include all current training hours for each food service employee onto the [DPI tracking tool](#) or create your own on a Google Sheet and share it with the consultant to view.

Water

Commendations

- Water is available to the students within the cafeteria. There is a pitcher of water and cups available. There is also a drinking fountain in the cafeteria. Great job!

Food Safety and Storage

Commendations

- The Food Safety Plan is well organized and up to date. It has all of the required information such as the Process 1, 2, and 3 foods, the list of equipment, the Employee Reporting Agreements, and the necessary SOPs. All temperature logs were taken daily and kept organized in a binder.

Food Safety Inspections

- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the “And Justice For All” poster can be a convenient way to have both items publicly visible.

- ❑ **Finding #1:** Most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action Needed: Post most recent food safety inspection report in location visible to public.

- **Completed on-site. No further action required.**

- ❑ **Finding #2:** The Food Safety Plan is missing an SOP for donated foods. The school receives meat that is donated and then processed in a USDA inspected facility.

Corrective Action Needed: Work with your Sanitarian to create an SOP for the donated foods. Submit this via email to the consultant.

Buy American

Technical Assistance (TA)/Compliance Reminders

- Two products were found to be non-domestic: pineapple and mandarin oranges.
- Be sure to track any non-domestic items using the [tracker form](#).

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

School Breakfast Program (SBP)

Commendations

- The SFA does a nice job promoting the School Breakfast Program. They operate the breakfast program at mid-morning. As a result, they have very high breakfast participation. Keep up the great work!

Summer Food Service Program (SFSP) Outreach

Commendations

- The SFA notifies families that students can get free meals at Clintonville High School in the summer when summer school is in session. If Clintonville allows all students to participate in the Summer Food Service Program and it is not contingent on attending summer school classes, please notify families towards the end of the school year that these summer meals are available. It is a best practice to provide more information listed below, especially the phone numbers the families can call or text to find summer meals wherever they are or where they are traveling to.

Technical Assistance

Summer Meals

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. Rose, USDA requires 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 webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text "Summer Meals" to 97779 to find summer meals in the area
- Promotion of the USDA [Summer Food](#) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](#) on the SFSP website.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. 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 student success.

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



With School Nutrition Programs!