

**USDA Child Nutrition Programs  
Administrative Review Summary Report**

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**School Food Authority: St. Mary Catholic Schools**

**Agency Code: 707457**

**School Reviewed: (5980) St. Mary Elementary School**

**Review Date: 02/05/19-02/06/19**

**Date of Exit Conference: 02/06/19**

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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, 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).
- 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, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Mary Catholic Schools for sending records offsite, making yourselves available to answer questions on-site, and for being receptive to our recommendations. Overall, the program is operating very well. Your positive attitude and energy are uplifting. Keep up the good work!

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Technical Assistance (TA)/Compliance Reminders

91 eligibility determinations were reviewed, 2 errors were identified. The error rate was 2.198%. No fiscal action will be taken. However, the errors still need to be corrected as outlined on the SFA-1 form.

##### Free and Reduced Price Meal Applications

- Section A. under Step 3 should have language explaining Child Income. This is missing from the SFAs Free and Reduced Price Meal Application. It appears this was a clerical error. The box on the far right to report child income was still present. The SFA located the correct template while the reviewer was onsite and will begin utilizing the correct template moving forward. As a reminder, if an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team.
- Wisconsin requires source documentation of the student's previous eligibility when transferring between LEAs during the school year, over the summer, or at the start of the next school year.

##### Disclosure

If the SFA exercises the option to provide the opportunity to waive or subsidize other district fees (e.g., registration, athletic fees, technology fees, etc.) based on a student's free or reduced price meal benefit status, the SFA must provide the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>) form to all recipients as determined through an application as well as Direct Certification. **SFAs must allow households to limit consent to only those programs they wish to share information. SFAs are not allowed to have a blanket fee waiver.** Local benefit initiatives outside of the meal benefit cannot be provided until a signed form is returned to the SFA. Alternatively, SFAs can have parents/guardians self-disclose eligibility information by providing a copy of their application approval letter to the program offering fee waivers or subsidized fees. Another option is for fee waivers and subsidized fees to be handled outside of the food service department by an alternate data collection method.

##### Findings and Corrective Action Needed: Certification and Benefit Issuance

✓ **Finding #1:** Certification errors A and B as indicated on the SFA-1 form.

**Corrective Action Needed:** Follow-up with the LEAs outside of St. Mary Catholic School to share the proper source document, which is a copy of the free and reduced price meal application for both errors. **Completed. No further action required.**

## Verification

### Technical Assistance (TA)/Compliance Reminders

- The confirming official checks only the selected application(s) for accuracy **before the verifying official contacts the household(s)**. The confirming official signs and dates the application or the tracking tool when the review is complete.
- The [Verification Tracker Form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form-1819.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form-1819.docx) can be used to assist the agency in beginning and tracking the verification process. Include a copy of the application with this form.

### Meal Counting and Claiming

#### Edit Check

The claim preparer had the edit check form filled out and attached to the daily meal count report, but did not fully execute the edit check process or understand its purpose. Technical assistance was provided onsite. The reviewer has confidence that the SFA now understands the full process and intent.

Regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made. The [daily participation/edit check form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc) is provided for those manually consolidating claims—or without a software edit check function. School agencies are not required to use this particular form but must perform an edit check after completing the calculations shown on the bottom of the form. Those school agencies with computerized meal counting systems or in process of purchasing such a system should ask vendors about the edit check feature.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to the staff at St. Mary Catholic School for their warm welcome and cooperation throughout the administrative review. It has been a pleasure working with your staff.

### Comments/Technical Assistance/Compliance Reminders

#### **Week of Review - Meal Pattern Compliance**

There was a weekly grain shortage during the week of review, December 10-14, 2018. The alternate entree options, PBJ sandwich and chef salad only offer 1 oz eq grain daily. Monday-Thursday the students selecting these entree options did not have access to another grain. On Friday, they did have access to the rice on the main line. However, over the course of the week the students were only offered 6 oz eq grain (4 oz eq grain total for Monday-Thursday and 2 oz eq grain on Friday). The required minimum is 8 oz eq grain, weekly.

Keep in mind, each entree option must meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Since students are only able to select one entrée option, each entrée option offered is viewed as one “line” and therefore needs to meet the daily as well as the weekly requirements.

### **Week of Review - Dietary Specs**

After reviewing the week of review, December 10-14, 2018 it was noted that the meat/meat alternate exceeded the recommended 10 oz eq per week maximum. Some planned serving sizes of menu items could be decreased to reduce the amount of meat/meat alternate offered. The french dip, chef salad, french toast and cheese omelet and taco meat and cheese all offer 3 oz eq meat/meat alternate each. This means that over the course of the week, students are offered 15 oz eq meat/meat alternate. This does not include any extra meat/meat alternate they take as offered on the salad bar (eg, peanut butter). The recommended maximum is 10 oz eq meat/meat alternate per week.

Consider adjusting these recipes to only provide 2 oz eq meat/meat alternate so that the recommended weekly meat/meat alternate amounts are not greatly exceeded.

### **Milk recipe**

St. Mary Catholic School has a milk recipe; however, milk was still being counted by type. When a milk recipe is on file, total milk usage only need be recorded on production records. Milk recipes must be updated twice per year or when you notice that students’ preferences have changed.

### **Menu available on the website**

The printed menu should list all components included with the reimbursable meal. Currently, fruit is not listed on the menu. Please update the online menu to include the fruit choice.

### **Standardized recipes**

Technical assistance was provided for the recipe standardization process as well as the importance of following the recipes as written. Recipe standardization ensures that each menu item is produced with consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. The recipe standardization process make take several times producing the menu item to make sure it comes out the same way. This requires organized record keeping throughout the process.

Many recipes are created for 100 servings, however, St. Mary’s Catholic School typically serves 40-50 students. The lead nutrition worker mentioned to reviewers that they were adjusting recipes without checking in with the food service director. It is important for the food service director to remind line staff the importance of following the recipe exactly as written, or to communicate with management if a different recipe is needed. This is essential to ensure that the meal pattern is still being met.

Continue to use the resources on our 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 [Standardized Recipes](#) webpage. We encourage viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>; <https://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

### Information to include on standardized recipes

Please review, update and/or add the following information to your recipes:

- Age/grade groups served
- Crediting. Recipes did not always list the correct crediting.
- Ensure all food items included in the recipe are documented. For example, the food service director said that crispy chicken salad is served with a breadstick, but no breadstick was listed on the recipe.
- Detailed instructions for how to prepare the recipe, including any equipment needed.

Recipes to update:

- Salad Bar Elementary School - update vegetables listed to current vegetables in use. Review serving sizes.
- Chef salad - update amount of romaine; add correct crediting; add the turkey listed in the instructions to the ingredient list; add age/grade groups
- Ham and cheese sandwich - check crediting

### Training

The lead nutrition worker would benefit from additional training on the importance of following standardized recipes, meal pattern, production records, record keeping, and proper portion control. The following videos cover some of the topics listed above and may be used for training:

- DPI's [Production Records](https://media.dpi.wi.gov/school-nutrition/final-production-records/story_html5.html) webcast ([https://media.dpi.wi.gov/school-nutrition/final-production-records/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/final-production-records/story_html5.html))
- DPI's [What's the Scoop on Portion Control?](https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story_html5.html) Webcast ([https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story_html5.html))
- Institute of Child Nutrition [On The Road to Professional Food Preparation: Portion Control](https://www.youtube.com/watch?v=07bpV_70e00) video ([https://www.youtube.com/watch?v=07bpV\\_70e00](https://www.youtube.com/watch?v=07bpV_70e00))

Additionally, each summer the DPI School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. Courses such as Meal Pattern: The Whole Enchilada and Offer versus Serve (OVS) are recommended for lead workers and menu planners from each site. Information, including dates and locations, will be posted on the SNT [Training](http://dpi.wi.gov/school-nutrition/training) webpage, as they are scheduled (<http://dpi.wi.gov/school-nutrition/training>).

### Signage

Additional signage on a salad bar is recommended to assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) with pictures that can be used (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

### Production records/Transport sheets

- Ensure that the planned serving size is correct on production records (including the salad bar production record) and transport sheets.
- The age/grade groups listed on the production records should reflect the USDA meal pattern in use. Since St. Mary's Catholic is using the K-5 meal pattern, the production records should list the K-5 meal pattern, not Pre-K -5.

- The portion size does not always match the serving utensil used. Ensure that the correct serving utensil is being used. For example, on Monday December 10th of the week of review the green beans have a portion size of ½ cup, however the serving utensil used says 3oz.

The salad bar menu options and some of the main line entree options are listed on a condiment bar production record in addition to the main line production record. Not only is this extra work for the school nutrition staff, but it is confusing for reviewers and more likely to produce errors. It is recommended to combine these two records. Alternate entrees, and anything offered on the main line should only be documented on the production records and the salad bar production record should only be used for the options offered on the salad bar.

### **Production Records**

Production records are required as documentation that your school is serving reimbursable meals that contain all required meal pattern components; they prove that reimbursable meals were served. They also aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. The production records provided were not easily understood.

Continue to work with all staff members to document planned usage, actual usage, proper serving utensils used and leftovers. Currently, the daily transport sheets and production records reflect much of the same information twice. In order to increase efficiency, consider consolidating the transport sheet and production record into one document. Production record templates can be found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

### **Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality**

**❑ Finding #1:** Weekly grain shortage during the week of review. The shortage was found in the alternate entree options (PBJ and Chef salad) as they only offer 1 oz eq grain daily.

**Corrective Action Needed:** Submit a statement explaining will be done to the week of review so that there is no weekly grain shortage when the PBJ and chef salad are offered.

**❑ Finding #2:** The recommended maximum of 10 oz eq meat/meat alternate was exceeded

**Corrective Action Needed:** Submit a statement that details your plan to reduce the amount of weekly meat/meat alternate offered.

**❑ Finding #3:** The printed menu does not list fruit. All components that are offered as part of a reimbursable meal must be listed on the menu.

**Corrective Action Needed:** Add fruit to the online menu and submit a picture, scan or screen shot of the updated copy.

**❑ Finding #4:** Standardized recipes need to be updated.

**Corrective Action Needed:** Update the following recipes and submit as corrective action:

- Salad Bar Elementary School - update vegetables listed to current vegetables in use. Review serving sizes.
- Chef salad - update amount of romaine; add correct crediting; add the turkey listed in the instructions to the ingredient list; add age/grade groups
- Ham and cheese sandwich - check and update crediting

❑ **Finding #5:** Additional training needed for lead nutrition worker.

**Corrective Action Needed:** Provide additional training to lead nutrition worker. The training videos listed below may be used, or other trainings of your choosing. Please document what trainings were offered, when they were completed and include the attendance sheet with the signatures of all who participated.

- DPI's [Production Records](https://media.dpi.wi.gov/school-nutrition/final-production-records/story_html5.html) webcast (https://media.dpi.wi.gov/school-nutrition/final-production-records/story\_html5.html)
- DPI's [What's the Scoop on Portion Control?](https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story_html5.html) Webcast (https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story\_html5.html)
- Institute of Child Nutrition's [On The Road to Professional Food Preparation: Portion Control](https://www.youtube.com/watch?v=07bpV_70e00) video (https://www.youtube.com/watch?v=07bpV\_70e00)

❑ **Finding #6:** Production records missing key pieces of information, including planned usage, actual usage, proper serving utensils used for indicated planned serving size and leftover amounts.

**Corrective Action Needed:** Submit 1 week of completed production records and salad bar/condiment production records, ensuring that all necessary information is recorded. Refer to the [production record requirements list](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf), as necessary (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).

*Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.*

### 3. RESOURCE MANAGEMENT

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

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. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found on our Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

#### **Paid Lunch Equity (PLE)**

The agency utilized the 18-19 SY flexibility.

#### **Revenue from Nonprogram Foods**

The agency is doing an excellent job separating program and nonprogram food costs and revenues. Nonprogram food items are assessed using the nonprogram food revenue tool and items are priced to cover all cost (food, labor, supplies, etc.).

### 4. GENERAL PROGRAM COMPLIANCE

#### **Civil Rights**

## Technical Assistance (TA)/Compliance Reminders

### Civil Rights Training

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

### Civil Rights Self-Compliance Form

The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

### Nondiscrimination Statement

When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) 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.

### 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf) 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.

### Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if



an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\_combined\_6\_8\_12.pdf).

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

✓ **Finding #1:** The determining/verifying official did not complete civil rights training. This is an annual requirement.

**Corrective Action Required:** Review the Civil Rights PowerPoint posted on the SNT Civil Rights website. Submit a statement to the consultant indicating when it was reviewed. Keep annual record of completion. **Completed 2/5/19. No further action required.**

### **Local Wellness Policy**

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

The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

#### **Content of the Wellness Policy**

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).

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies ([http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, a LWP minimum requirements checklist, and report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

### **Findings and Corrective Action Needed: Local Wellness Policy**

❑ **Finding #1:** SFA LWP meets some but not all requirements as stipulated above.

**Corrective Action Required:** Please provide a timeline for updating your policy to become compliant with the final rule. The current policy is missing language related to:

- Food and Beverage Marketing;
- Completion of a triennial assessment.

### **Smart Snacks**

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

At the time of the on-site review there were no competitive foods or beverages sold at St. Mary Catholic School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

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

None.

### **Professional Standards**

#### **Technical Assistance (TA)/Compliance Reminders**

##### 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](http://dpi.wi.gov/school-nutrition/training/professional-standards) is posted to our Professional Standards webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
  - Directors: 12 hours
  - Managers: 10 hours
  - Full Time 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.

### Water

The agency is in compliance.

### Food Safety and Storage

#### Commendations/Technical Assistance/Compliance Reminders

##### 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.

##### Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas, reviewers felt the organization of these spaces could be improved to ensure food products are following FIFO and staff could more easily locate product.

##### Temperatures

All cooling equipment must have internal temperatures taken and recorded daily **on temperature logs**. Posting the logs directly on the equipment or all on a clipboard (as suggested by the new food service director) makes it convenient and a regular part of daily routines.

##### Standard Operating Procedures (SOPs)

The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.

##### Food Employee Reporting Agreements

It is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document. Since the agency has a couple volunteers that work with food preparation and service, reviewer recommended that reporting agreements be completed, or at a minimum the concept is discussed during onboarding. Training on health reporting would count towards job-specific training hrs. for professional standards.

#### Findings and Corrective Action Needed: Food Safety

- Finding #1:** St. Mary El School staff are not following procedures outlined in *SOP #5 Using and Calibrating Thermometers* and *SOP #10 Storing Food*. As a reminder, procedures state to maintain clean and uncluttered storage areas as well utilizing the the practice of First In First Out (FIFO) product rotation.

**Corrective Action Needed:** Re-train staff on SOP #5 and #10. Submit a copy each SOP with the date and signature of the staff members that received training.

✓ **Finding #2:** 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 #3:** St. Mary El School does not have an SOP within the Food Safety Plan to use insulated milk bags. Milk temperatures are not being logged prior to returning milk to the cooler. The use of the bags seem unnecessary when there is a reach-in milk cooler under proper temperature control in the meal service line.

**Corrective Action Needed:** Submit a statement to the consultant outlining how the agency will proceed. Ensure your practice aligns with the SOPs in your site-specific food safety plan.

### **Buy American Provision**

#### **Commendations**

The food service director maintains a spreadsheet where all non-compliant products are tracked as they are received. *Thank you and keep up the good work!*

#### **Findings and Corrective Action Needed: Buy American Provision**

None.

#### **Reporting and Recordkeeping**

The agency is in compliance.

### **Summer Food Service Program (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. Mary Catholic Schools, 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](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) 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 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) 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](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:  
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator  
Phone: 608.266.7124; e-mail: [amy.kolano@dpi.wi.gov](mailto:amy.kolano@dpi.wi.gov)

#### **Findings and Corrective Action Needed: Summer Food Service Program (SFSP)**

☐ **Finding #1:** The SFA did not conduct SFSP outreach.

**Corrective Action Needed:** Submit a statement outlining what the agency will do during the 18-19 SY to inform households of where they can receive a free meal over the summer months.

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).”



*With School Nutrition Programs!*