

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Marshfield Area Catholic Schools Agency Code: 717033

School(s) Reviewed: Columbus Catholic High School

Review Date(s): May 15-17 2018

Date of Exit Conference: 5/17/18

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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, 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, and 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 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Columbus High School for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing 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

62 Applications were reviewed, no determining errors were found.

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ Finding: On the applications reviewed, it was found that one did not have the determining official signature on it. There were some that the date for determining the application was written the wrong box. Technical Assistance was provided as how to fill in the applications. In speaking with the Food Service Director, it seems that she could use a refresher/clarification in determining the applications, and the roles of the 4 Officials. Technical Assistance was also provided in recommending that the Food Service Director use a blank application, with a red checkmark in all areas that she will need to fill in, as a guide for herself, so nothing is missed when completing an application.

Corrective Action Needed: In order to complete the applications correctly when determining them, and to fully know the roles of the officials, the corrective action will be to watch the Free/Reduced Webcast and submit a statement listing the date, name of webcast, and the food service director signature. This can also be listed for Professional Standards Training.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

Verification was completed correctly, with one application selected. The family responded, and letter sent out stating the students eligibility status stayed the same. The Verification Collection Report was completed on time.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Meal Counting and Claiming

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff at Marshfield Area Catholic School for their warm welcome and cooperation throughout the administrative review. Reviewers took note of and greatly appreciated your care and concern for the students. We noted that you only serve cut fruits and vegetables for greater ease of

eating, and the cafeteria was decorated in an inviting way. We also thank you for your swift action in correcting things onsite, as you were able.

Comments/Technical Assistance/Compliance Reminders

Crediting Documentation

Acceptable crediting documentation was not available for the hash brown patties, potato rounds, and graham crackers (for making frosted graham sandwiches) used during the week of review. Processed foods, like the potato patties and rounds, that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting. Please provide crediting information for this product by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the product(s). If proper documentation cannot be obtained, you must discontinue use of this product in school meals.

Thank you to the food service director for your persistence and determination in trying to obtain a PFS for the potato products while reviewer was onsite. Follow-up with the manufacturer revealed that the hash brown patties and potato rounds do not have PFSs. Technical assistance was provided to discontinue these products since appropriate crediting information is not available.

In regards to the graham crackers, additional clarification on the serving size and gram weight of the graham crackers used in the frosted graham cracker sandwiches is needed to determine the crediting. However, the food service director stated these would be removed from the menu.

More information about crediting documentation can be found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

Daily Vegetable shortage on Main Line

The main line on Wednesday of the week of review only offered ¼ cup celery and a hash brown patty. Due to inadequate crediting of the hash brown patty, crediting towards the starchy vegetable subgroup could not be determined. In addition, only a ¼ cup of celery was offered, therefore, this created a daily vegetable shortage. High School students must be offered at least 1 cup vegetable daily.

Recipe Standardization

Standardized recipes are important because they produce a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. It also ensures that each meal is consistently planned to meet the daily and weekly requirements. Any menu item that has more than one ingredient, or any recipe that food service staff are adding or subtracting ingredients from, should have a standardized recipe.

The following menu items did not have a standardized recipe:

- Brownies

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 our [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) 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. We also encourage viewing the webcast, [What's the Yield with Standardized Recipes?](http://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes; http://dpi.wi.gov/school-nutrition/training/webcasts#sr).

Salad Bar

Columbus High School offers students the ability to create a reimbursable meal with a salad bar. The students have a wide selection of vegetables, from all the vegetable subgroups, and fruits, which makes it an attractive meal option. The reviewer's one concern is the amount of meat/meat alternate available to students. The options include shredded cheese, diced turkey and ham, diced egg, yogurt, cheese stick, tuna salad and cottage cheese. During onsite observation and discussion with the food service director, it was noted that students do not take all these food items, but since there is no signage limiting what they can take, it is assumed they could. Allowing this many meat/meat alternate options exceeds the recommended weekly maximum of 12 ounce equivalents (oz eq). This means that dietary specification would likely be exceeded if a student were to select all the meat/meat alternate options. The meat/meat alternate options that are offered on the salad bar contribute extra calories, saturated fat and sodium and should be more closely monitored. Technical Assistance was provided to limit meat/meat alternate daily options (instead of offering eight options every day, choose only four instead and rotate the options throughout the week) in this way, students would not have access to so many meat/meat alternates and the salad bar meal line would better comply with the meal pattern.

Another way to control the serving sizes of the meat/meat alternates on the salad bar is to add standardized serving utensils (scoops or spoodles, not tongs) to each food item offered. After the crediting is calculated for the meat/meat alternates offered, determine what size scoop or spoodle would provide that amount. It was suggested that each scoop credit the same amount of meat/meat alternate (for example, each scoop would contain 1 oz eq meat/meat alternate or each scoop would contain 2 oz eq meat/meat alternate). The addition of signage will help monitor how much of each item a student can take. This ensures that students take the correct amounts and it also makes it easy for the point of sale staff to recognize serving sizes and be confident that the student took the minimum amount to meet meal pattern requirements for a reimbursable meal.

Salad Bar Production Records

Planned portion sizes are required for every meal component. Even in self-service (the salad bar), the menu planner must plan a specific portion size that he or she intends students to take.

Technical assistance was given to include planned serving sizes for the salad bar production record. Please refer to the [Production Record Requirement list](#) found on our [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Signage on Salad Bar

Some items on the salad bar are served using tongs (baby carrots, celery sticks). It is strongly recommended to add signage for the salad bar so that students know how much or many of these items to take in order to have their minimum amounts required by the meal pattern. Technical assistance was provided and included using pictures of ½ cup portion sizes of the fruits and vegetables that don't easily fit into a ½ cup spoodle. For example, it takes 6 baby carrots to equal a ½ cup serving of vegetables or 6 whole cherry tomatoes equals ½ cup serving of vegetables. This provides those determining reimbursable meals a gauge to accurately identify reimbursable meals and those trays that may be lacking in fruit and/or vegetables. Thank you to the food service director for making signage for the next day's meal service!

Samples of menu signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](#) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Grain-Based Desserts

No more than 2.0 ounce equivalents (oz. eq.) of grain-based desserts can be offered per week at lunch. Grain-based desserts that are whole grain-rich can count towards the grain component, but grain-based desserts that are not whole grain-rich (made with more than 50 percent enriched grains) cannot count towards the grain component. Grain-based desserts contribute towards the weekly grain-based dessert limit regardless of whether they are whole grain-rich or not (e.g., a slice of cake made with enriched white flour cannot credit towards the grain component, but it counts towards the grain-based dessert limit for the week in which it is served).

During the week of review, the following grain-based desserts were noted:

Main line

- Scooby graham crackers, donut, brownie
- 3.25 oz eq grains over the course of the week

Salad bar line

- frosted grahams, Scooby graham crackers, donut, brownie
- > 3.25 oz eq grains over the course of the week

Technical assistance was provided to limit the amount of grain-based desserts offered as part of a reimbursable meal and to use Exhibit A to verify which food products might contribute to the grain-based dessert limit. In addition, after further discussion with the food service director, it was determined that the graham crackers used in the frosted graham cracker sandwiches will be discontinued. This will help to reduce the amount of grain-based desserts offered during the week, and it eliminates the need to find additional crediting documentation since it will no longer be used for school meals.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding #1: Insufficient crediting documentation for the hash brown patties, potato rounds and graham crackers.

Corrective Action Needed: Submit a statement saying that you will discontinue use of the hash brown patties and potato rounds. Additionally, confirm that if any other processed potato product is purchased, a complete and accurate PFS will be obtained.

Finding #2: Daily vegetable shortage on Wednesday of the week of review.

Corrective Action Needed: Submit a statement that states that you will always offer at least 1 cup vegetables to High School students.

Finding #3: Brownies did not have a standardized recipe

Corrective Action Needed: Create a standardized recipe for the brownies and submit as corrective action.

Finding #4: Excessive meat/meat alternate available to students on the salad bar line

Corrective Action Needed: Submit a statement that details your plan to limit the amount of meat/meat alternate on the salad bar line.

Finding #5: Planned serving sizes not documented on salad bar production records

Corrective Action Needed: Submit a copy of your revised production record that contains a space to record planned serving sizes.

Finding #6: Grain-based dessert limit of 2 oz eq grains per week was exceeded.

Corrective Action Needed: Submit a statement that explains how or what you will do to be in compliance with this requirement.

Buy American Provision

Comments/Technical Assistance/Compliance Reminders

The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating that the product, “was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can be accepted in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. **If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.**
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the Introduction to the Procurement Policy and Procedures Handbook (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>).
- Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>; and <https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

Thank you to the food service director for having a non-compliant product list. A few additional items must be added to the list:

- Canned pineapple chunks - Philippines
- Dole tropical fruit salad (in plastic bag) - Philippines

- Fresh cucumbers - Mexico
- Fresh mixed peppers - Mexico
- Fresh bananas - Central America
- Canned Sysco products with no country of origin listed (applesauce, sliced pears)

More information on this new requirement, and a template you can use to [track noncompliant products](#), can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American Provision

❑ **Finding #1:** The following products were not listed in the SFAs non-compliant tracking list:

- Canned pineapple chunks - Philippines
- Dole tropical fruit salad (in bag) - Philippines
- Fresh Cucumber - Mexico
- Fresh mixed peppers - Mexico
- Fresh bananas - Central America

Products that only say “Distributed by...”

- Canned applesauce (Sysco)
- Canned sliced pears (Sysco)

Corrective Action Needed: Add the products listed above to your non-compliant product list. *Thank you to the food service director for completing non-compliant forms for the canned pineapple chunks, tropical mixed fruit, and bananas. No further corrective action is needed for those products.* Correction action still required for the fresh cucumbers, mixed peppers and canned Sysco fruits. Provide a copy of those forms when they are complete. The [template form](#) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

Marshfield Area Catholic Schools do hold fundraisers during the school day. A few of which are candy cane, candy bar, and ice pop sales. To note, on the day of onsite observation, the concession stand was opened before the end of the school day. None of these fundraisers evaluated their products for Smart Snacks compliance, and there was not a tracking system in place for these food sales.

Since these food sales occur during the school day, which is defined as midnight of the instructional day to 30 minutes after the last school bell, they must meet Snack Snacks standards or be considered an exempt fundraiser. Exempt and non-exempt fundraisers must be tracked to ensure that the guidelines are being followed.

Here is a brief review of two situations by which an organization may sell foods and beverages to students during the school day.

1. If foods and beverages sold *are* Smart Snack compliant:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This includes nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.

2. If foods and beverages sold *are not* Smart Snack compliant:
 - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
 - b. Exempt fundraisers **cannot** occur in the meal service area during meal times.
 - c. Someone in the school 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.

You can find more information on our [Smart Snacks](#) webpage, including templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Findings and Corrective Action Needed: Smart Snacks

❑ **Finding #1:** Non-compliant products sold at the concession stand which was available for purchase before the end of the school day.

Corrective Action Needed: Submit a statement that states you will not open the concession stand during school hours unless all products sold are compliant with Smart Snacks standards. *Completed onsite. No further action required. Thank you!*

❑ **Finding #2:** School day fundraisers not being tracked adequately.

Corrective Action Needed: Submit a written statement with the name of the person who will be in charge of tracking fundraisers and what tracking tool will be used. You may choose to use a DPI tracking tool, or you may create your own as long as it contains all the required information as noted above. These tools are located on the [Smart Snacks](#) webpage under the Resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

3. RESOURCE MANAGEMENT

- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](#) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- 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](#) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). 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): <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

Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid*

households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the [Wisconsin Department of Revenue](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) (DOR) as unclaimed property (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>). The DOR has rules concerning unclaimed property that must be followed.

Commendations/Comments/Technical Assistance/Compliance Reminders

In reviewing the Annual Financial Report, the Food, Labor, Equipment were broken out as required. No further action needed.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. A roster system is being used with one person checking off each student at the end of the line, and another person double checking that each student has all the components on their tray after the condiment table. Great job!

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminde

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Great job running this tool! The current weighted average price for 2018-19 School yr. is \$2.87.

Technical Assistance:

- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the [PLE 'In a Nutshell'](#) for more information on the PLE tool.
- Refer to the most recent [memo](#) from DPI.
- Refer to the most recent [guidance memo](#) from USDA.
- Step by step instructions to completing the PLE tool can be found on our [financial website](#) under Paid Lunch Equity.

The District chose to do the Paid Lunch Equity Tool, although it is not required for the 18-19 school year, unless the district Food Service Account would be in the negative balance. The Food Service Account has a positive balance. The PLE survey was completed, and the Annual Contract was updated and submitted for approval during our Administrative Review.

Revenue from Nonprogram Foods

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs 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.

- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

- 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>).
- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Commendations/Comments/Technical Assistance/Compliance Reminders

The Non-Program Food Revenue Tool has been completed.

Indirect Costs

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local reality broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.

- Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume.

Commendations/Comments/Technical Assistance/Compliance Reminders

There were no indirect costs found.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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 October 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, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered.

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 training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

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

Commendations/Comments/Technical Assistance/Compliance Reminders

Technical Assistance was provided regarding the Non-Discrimination shortened statement on the monthly menu’s. The one currently being used says “This institution is an equal opportunity provider and employer.” It will be changed to say “This institution is an equal opportunity provider.” This was corrected on site. No further action needed.

Findings and Corrective Action Needed: Civil Rights

❑ Finding: It was found that the Non-Discrimination Statement was not on the districts Unpaid Meal Policy. The Non-Discrimination Statement is required to be on or attached to all correspondence to families from Food Service. All other Food Service related materials had the updated correct statement on them at the time of our review.

Corrective Action Needed: The Food Service Director said this was an oversight, and she had thought she made sure all information had the statement in it. All other Food Service Documentation had the current NDS statement on it. It was discussed to make sure all documentation for Food Service going out to families, have the most updated statement attached. This was corrected on site, and going

forward to next school year, she will make sure to include it on all documentation. No further action needed.

On-site Monitoring

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.
- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo [SP 56-2016](#) (<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>).
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](#) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).
- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on our [Community Eligibility Provision \(CEP\)](#) webpage, under the resources for currently participating sites section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

Commendations/Comments/Technical Assistance/Compliance Reminders

On site-monitoring has been done and is documented.

Local Wellness Policy

Content of the Wellness Policy

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. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](#) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). 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).
- **SFA is required to have a committee of diverse stakeholders and/or a roster of those involved (1003)**
- **Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. SFA wellness committees should include a diverse team of committed school and community stakeholders. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.
- **SFA is required to complete an assessment of the Local Wellness Policy (1005)**
- **Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your schools report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](http://wellsat.org/)) for assistance in assessing the LWP (<http://wellsat.org/>).
- **Technical Assistance for 1006, if do have a policy:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and

newspaper articles. It is recommended SFAs include a plan to improve upon the results of the assessment.

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). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Local Wellness Policy

Finding: Your SFAs Local Wellness Policy does not contain language for all the minimum required elements stipulated above (1000)

Corrective Action Needed: Language must be added related to the following content areas : Policy Leadership, Public Involvement, Foods sold outside the school meal program, and Triennial Assessment. Please provide a timeline for updating your policy to become compliant with the final rule. The [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) can assist with sample language (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>).

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

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, 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](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

- **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.

☐ **Finding:** The Business Manager is doing some reporting for the Food Service Department, and currently does not have any Professional Standards training as required for anyone involved with Food Service.

Corrective Action Needed: Submit a statement stating that you will watch training webcasts on our DPI website with connection to your duties for Food Service. For your position and amount of time you are spending on Food Service, it would be 4 hours per year of training. Make sure to use the DPI Tracking Tool to document your training, and retain those records for 3 yrs plus the current year.

Commendations/Comments/Technical Assistance/Compliance Reminders

Great job in having all of your staff up to date on training and Professional Standards Requirements! Technical Assistance was provided, to place all the training in the DPI Professional Standards Tracking Tool per the link provided above.

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

Water is readily available to all students at anytime in the cafeteria, and at no charge.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

All Food Service Reporting Agreements are signed by staff and on file as required.

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). While you're at it, visit the [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

Food Safety Inspections

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

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- 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.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Food Employee Reporting Agreements

- All food handlers must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- All food handlers must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, 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.

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.

Time as Public Health Control

- When using "Time as a Public Health Control:"
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of this holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour

- time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Time/Temperature Control for

Milk and dairy products

Shell eggs

Meat (beef, pork, and lamb)

Poultry

Fish

Shellfish and crustaceans

Baked potatoes

Heat-treated plant food, such as cooked rice, beans, and vegetables

Tofu or other soy protein

Sprouts and seed sprouts

Sliced melons

Cut tomatoes

Cut leafy greens

Untreated garlic-and-oil mixtures

Synthetic ingredients, such as textured soy protein in meat alternatives

Reporting and Recordkeeping

- 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.

Commendations/Comments/Technical Assistance/Compliance Reminders

All records are currently being kept for the required 3 yrs. plus the current year.

Summer Food Service Program (SFSP) and School Breakfast Program (SBP) Outreach

Commendations/ /Technical Assistance/Compliance Reminders

Summer Outreach Information is going out this week 5/17/18, to families letting them know where meals are available if needed. Great job in providing that information!

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 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>).

