

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

School Food Authority: St. Mary School
School(s) Reviewed: St. Mary School
Agency Code: 107694

Review Date(s): 2/5/19–2/6/19
Date of Exit Conference: 2/6/19

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, 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 School for the courtesies extended 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.

The staff members did an excellent job preparing for the review, and were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the nutrition programs. The food service staff were welcoming and clearly dedicated to their work.

It appears that participation in the lunch program is very high at St. Mary School. Most students came through the line to select a reimbursable hot lunch. It is great that the program is running well and appeals to students!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Of the 33 eligibility determinations reviewed, there were no errors identified. The determining official does an excellent job managing benefit issuance!

Technical Assistance:

Transferring Students

- Transferring the eligibility determination between Local Educational Agencies (LEAs) ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. USDA Food and Nutrition Service (FNS) strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.
- Wisconsin DPI requires source documentation of the student's previous eligibility. Source documentation means that the information originally used to determine the student's meal eligibility is shared with the school requesting the information for the new or transfer student. Source documentation may include a copy of the original application or a copy of a direct certification run with the student's name listed. A phone call or copy of a benefit approval letter are examples of documentation that would not be sufficient to establish the new or transfer student's eligibility.

Limited English Proficiency (LEP)

- While the SFA currently does not have households with LEP, it is important to make note of LEP requirements and resources.
- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with LEP.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The non-profit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- There were no findings for this section. Great job!
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Verification

Technical Assistance:

Standard Sample

- The standard sample size for verification requires that applications selected for verification be chosen from error prone applications approved as of October 1. An application is considered “error prone” if the reported income is within \$100 per month or \$1200 per year of the applicable income eligibility guidelines. On the verification collection report (VCR) and off-site assessment questions, the SFA reported that standard sample was used. However, none of the applications that could have been selected for verification were error prone so the verifying official randomly selected one application from the entire pool. During future verification processes and submission of the VCR, the verifying official should indicate that Alternate One sample is used unless the application selected for verification is indeed considered “error prone.”

Official Roles

- While all officials are correctly designated on the contract and the appropriate signatures were on the verified application, there was confusion over the order of the confirmation review and role of the confirming official.
- The determining official is responsible for processing submitted applications and determining the benefit the household is eligible for. Before verification activities can begin, a designated confirming official must review each approved application selected for verification to confirm that the initial benefit determination was accurate. The confirming official does not need to double check all applications processed by the determining official—just those selected for verification. After the confirming official confirms the initial determination on the selected applications, then the verifying official may begin the verification process by contacting the household to request supporting documentation. If the confirming official disagrees with the initial determination, then specific procedures must be followed to proceed with verification. Please reference pages 103-104 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) for additional information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Findings and Corrective Action Needed: Verification

- There were no findings for this section. Great job!
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Meal Counting and Claiming

Commendations:

- The claims for reimbursement appeared accurate. Appropriate edit checks were used for claim submission. Data available supporting the annual claim for the Wisconsin School Day Milk Program (WSDMP) appeared accurate and thorough. The SFA uses a manual system of benefit issuance, counting, and claiming. The claim preparer does an excellent job organizing all of the counting and claiming information. The claim preparer’s eye for detail resulted in no meal counting and claiming errors.
- The point of service (POS) procedures for lunch and WSDMP meet the requirements for an acceptable POS and appear to yield accurate daily counts. It is great that the teachers responsible for checking students off at lunch and “milk break” understand the importance of the POS, take

care to check off students correctly, and participate in training pertaining to the Child Nutrition Programs!

Technical Assistance:

Visiting Students

- Please note that SFAs may claim visiting students outside of the district in the paid category or the individual's benefit category with documentation, unless they are from a CEP school. In order to ensure the full meal cost is covered when serving visiting students, it is recommended to either charge the student the paid student price and claim in the paid category, or charge the adult meal price and not claim the meal. Simply charging the paid student price but not claiming for reimbursement will likely not cover the entire cost of the meal.
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2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- The food service director (FSD) submitted the requested information in a timely manner. Thank you to the FSD for prompt communication, organized documentation, and nicely planned menus. The FSD is obviously knowledgeable of the program and meal pattern requirements. Kitchen staff members were friendly, knowledgeable, and well organized. The meal service line moved at a good pace. Students were observed taking a variety of the vegetables offered--great! Servers nicely portioned condiments for younger students during first service. This is an excellent way to ensure appropriate condiment portion sizes. It was a pleasure to visit and review St. Mary School. Please reach out with any future questions.

Technical Assistance:

Fruit Service

- Two ¼ cup scoops of mixed fruit were served to students on the day of observation. One ½ cup scoop would be a quicker and easier way to ensure that students are offered the required ½ cup of fruit daily. A ½ cup spoodle was found in the kitchen and used for second service.

Salad Bar Service

- Servers nicely portioned the lettuce and cauliflower for younger students during first service. Older students appropriately self-portioned vegetables during second service. All observed meals were reimbursable and contained at least ½ cup of fruit and/or vegetable. Because the salad and cauliflower are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. Consider utilizing our [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

Standardized Recipes

- Quantity recipes were found in the kitchen. Please note that quantity recipes will only be standardized once they have been tried, tested, and adapted to your food service operation. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

***Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*

- ❑ ****Finding A:** There was a grain shortage during week of review. The PK-4 menu from the week of review offers student at minimum 1 oz eq grain daily, which meets daily meal pattern requirements. However, students were only being offered 7 oz eq grain during the week, which does not meet the weekly K-8 meal pattern requirement of minimum 8 oz eq grain.
 - Monday: 1 oz eq (rice)
 - Tuesday: 2 oz eq (corndogs)
 - Wednesday: 1 oz eq (tortilla)
 - Thursday: 1 oz eq (bun)
 - Friday: 2 oz eq (Italian dippers)

Corrective Action Needed: Submit a written plan explaining how daily and weekly grain minimums will be met when this menu is served in the future. Submit nutrition facts, crediting information, or standardized recipes (as appropriate) if a grain item is being added to the menu.

- ❑ **Finding B:** Incorrect/inappropriate grade grouping was observed and had also been noted in the 2015 AR report on the last administrative review. Currently, different portion sizes are served to students based on grade (PK-4 versus 5-8). There is not a 5-8 meal pattern. There are two options available:
 - Serve K-8 meal pattern (*recommended*)
 - Serve K-5 and the 6-8 meal pattern
- Students in grades 5-8 at St. Mary School have access to larger sized entrees. For grades 5-8, the maximum ounce equivalents (oz eq) of weekly grain and weekly meat/meat alternates offered exceeded the K-8 maximum guidelines for the week of review. While maximums are not currently being enforced, the maximums are in place as a guideline for dietary specifications. If schools meet the minimum weekly requirements for grain and meat/meat alternate and do not exceed the maximum requirements, dietary specifications should be within the guidelines for K-8 students provided on the [Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>). **The current PK-4 menu is nearer to compliance for all K-8 students without exceeding maximums.**
- The maximum amount grains offered to 5-8 students during the week of review was **12 oz eq grain**. The guideline for the grain maximum for the K-8 meal pattern is **9 oz eq grain**.
- The maximum amount of meat/meat alternate offered to 5-8 students during the week of review was **16 oz eq meat/meat alternate**. The guideline for the meat/meat alternate maximum for the K-8 meal pattern is **10 oz eq meat/meat alternate**.
- The Weekly Nutrient Calculator can be used to analyze calories, saturated fat, and sodium values weighted over the week. When analyzing nutrients, remember that the values must be weighted according to popularity (how the menu planner plans for each item to be selected). This tool can quickly show both high and low menu items, as well as high or low days on the menu, making it quick to determine which days could be mixed and matched throughout the month. This tool can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage, under Menu Planning Tools (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools>). The 5-day version should be used for St. Mary School.
- Meal pattern requirements are developed from evidence-based science, and they are revisited every five years to keep up with new scientific developments in the field of nutrition. The Dietary Guidelines for Americans, which are the nutrition recommendations on which the lunch and breakfast meal patterns are based, help guide federal nutrition policy, including policy affecting the school meals programs.
- Please keep in mind that one intent of the National School Lunch Program is to serve students nutritiously balanced meals and teach them healthy habits to last a lifetime. Offering larger

portions than necessary does not aid in teaching students good nutrition. This practice may also drive up food costs. WI DPI encourages schools to “keep in mind the best interests of the students and provide our school children with the most healthful and nutritious meals possible.”

Corrective Action Needed: Submit a written statement explaining how meal service and menu planning will be structured in the future based around either the K-8 or K-5/6-8 meal pattern. Ensure that dietary specifications (calories, sodium, fat) are within the appropriate range.

- ❑ **Finding C:** A variety of milk (at least two allowable milk types) is required to be offered daily at lunch. Allowable milk types in Child Nutrition Programs include fat-free (skim) and low-fat (1 percent) flavored and unflavored milk. Partway through first lunch service on the day of review, the milk barrel ran empty. A handful of students remained in the line. The staff member at point of service (POS) asked students if they wanted milk and which type. The staff member then retrieved milk from the cooler in the kitchen for the remaining students that asked for milk. Midway through second service, only chocolate milk remained in the barrel. The staff member at POS said they would retrieve more 1% white milk if a students asked for it. The milk barrel must be stocked so all students have access to multiple milk types. This issue was also noted in the 2015 AR report on the last administrative review. Please see the Food Safety Section of the report for additional information regarding milk barrels and reducing milk waste.

Corrective Action Needed: Submit a written explanation of how it will be ensured that two different milk types are available to all students throughout lunch service.

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

Technical Assistance:

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program.
- The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- 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 costing over \$5000 per unit. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other.”
 - Under “Purchases Services” report any time someone is paid for services provided such as equipment repair and health inspections.

- Under “non-program foods,” report 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, a la carte, and caterings would also be included here.

Allocating Non-Program Foods on the AFR

- Adult meals and extra milks (sold to cold lunch students and to paid-eligible students at milk break) are the only non-program foods sold at St. Mary School. The revenues and expenditures for these items must be broken out on the AFR.
- The expenditures for the extra milk would be the dairy cost paid to the vendor times the number of extra milks sold in the fiscal year.
- The expenditures for adult meals cannot simply be calculated by multiplying the selling price of \$3.50 by the number of meals sold, as this may not be representative of the actual cost of producing the meal. Please reference the tools and resources on the [DPI SNT Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>). Of particular importance are the [Nonprogram Food Revenue Tool Exceptions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) and the [Menu Raw Food Costing Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw-food-costing-tool.xls) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw-food-costing-tool.xls>).

Excess Cash Balance

- SFAs must limit the net cash resources in order to not exceed three months average expenditures. The ending fund balance for the 2017-18 school year slightly exceeded the three months of average operating expenses, which is considered an excess cash balance. A letter from DPI in the spring will formally advise the SFA on the necessity of spending down the excess balance. Some options to consider for spending down:
 - Provide reduced-eligible students with free meals. (See USDA Memo SP 17-2014)
 - Improve quality and variety of foods offered.
 - Increase marketing of the school meal program to increase participation.
 - Purchase additional or updated kitchen equipment, if needed.
 - Provide additional training to staff, which can include sending staff to conferences on school nutrition related topics.
 - Offer more local products or start a Farm to School program.
- Applying for a paid lunch equity (PLE) exemption for the 2019-20 school year is an option that cannot be used as a means to reduce excess cash balance, but may help prevent excess cash balance in future school years.

Unpaid Meal Charge Policy

- The school developed an unpaid meal charge policy for the first time during the current school year. As the policy is implemented and further developed, it is important to be aware of the requirements and recommendations.
- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot 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

- The USDA resource [Overcoming the Unpaid Meal Challenge](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-29-2017a2.pdf) has an array of information regarding best practices for unpaid meal charges, including suggestions regarding alternate meals <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-29-2017a2.pdf>.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding D:** The annual financial report (AFR) contained several errors.
 - Expenditures were not allocated to the Wisconsin School Day Milk Program
 - Expenditures were not allocated to non-program foods
 - The total revenues, total expenditures, and ending fund balance reported on the AFR did not exactly match the school's ledger documents that should support these figures.

Note: When allocating expenditures per program, expenditures should be allocated into each appropriate category including labor, food, equipment, purchased services, and other.

Corrective Action: Correct the AFR to resolve the errors described. Submit the edits via email to the consultant.

- ❑ **Finding E:** The unpaid meal charge policy was not distributed in writing (letter, email, handbook, registration materials, etc.) to all households at the start of the school year and to households transferring into the district during the school year. Please note that posting the policy on the district website is encouraged, but does not meet the policy distribution requirement.

Corrective Action: Submit a detailed plan describing how the policy will be distributed to all households in writing going forward.

Revenue from Non-Program Foods

Technical Assistance:

- The only non-program foods sold in the SFA are adult meals and extra milk. Students may not purchase individual meal items a la carte and there are no other a la carte items offered. Adults meals and extra milk are tracked appropriately on the manual point of service sheets and billed to the parish and families each month.
- Based on available invoices, the SFA pays approximately \$0.26 per half pint of milk. The SFA charges households \$0.30 per milk. This pricing appears reasonable to cover costs and allow families to purchase milk for their students at a low price.
- 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](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>). SFAs need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2018-19 SY) should be used to determine adult prices. St. Mary School currently charges \$3.50 for adult lunches, which is compliant with the minimum adult meal pricing requirements.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

- All school staff members (including teachers) with any roles in the Child Nutrition Programs completed civil rights training prior to the start of the school year. It is great that this training is provided school-wide!

Technical Assistance:

And Justice For All Poster

- The *And Justice For All* poster must be displayed in a prominent location and be visible to program participants. The poster should not be behind the serving line or in a location otherwise deeming it unreadable by program participants. The poster displayed at St. Mary School was behind the serving line and likely not readable by students. The poster should be moved to a more visible location in the cafeteria.

Processes for Complaints

- The SFA has a written process in place for receiving and processing complaints alleging discrimination within the school meals program. The SFA's policy states that all verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district will be forwarded to the Civil Rights Division of USDA Food and Nutrition within three days. Please note that the Permanent Agreement with the State Agency allows for up to five days to forward the complaint to USDA and/or to the State Agency.

Special Dietary Needs

- While the SFA is not currently accommodating any special dietary needs, it is important to note and become familiar with the pertinent regulations for possible accommodations in the future.
- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>).
- If accommodations will be made in the future based on signed medical statements, the food service director should receive and retain copies of the signed statements submitted by the household. It is crucial that the food service director be able to easily access the exact accommodation request so that it can be implemented correctly and safely according to the medical practitioner's directions.
- 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.
- Juice or water may not be substituted for fluid milk unless juice or water is specified as a substitution on a medical statement signed by a licensed medical practitioner. An SFA may choose to offer lactose-free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA without a medical statement. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

- 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>).

Non-Discrimination Statement

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

Technical Assistance:

Documentation

- Documentation pertaining to the LWP should be kept on file in the SFA to show that requirements are being met. This includes a roster of stakeholders involved in the LWP development/implementation/revision, records of when and how the policy is revised, where the policy is available publicly, how potential stakeholders are notified of their ability to participate in the LWP, and any information pertaining to the assessment of the 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 policy (LWP) requirements. At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
 - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
 - Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
 - Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
 - Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
 - Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
 - Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
 - Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete

a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Triennial Assessment

- 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 the 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).
- Additionally, the SFA is required 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 an improvement plan upon the results of the assessment.

Resources:

- Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding F:** The current wellness policy lacks specificity and does not contain all of the required content areas. Additionally, there is currently no established wellness committee and the policy is not publicly available. The food service director stated that the policy is under revision, however specific corrective action is needed to bring the LWP into compliance.

Correction Action: Submit a detailed timeline for updating the policy to become compliant with the final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule. Please include information regarding how a wellness committee will be established (including member recruitment strategies), how the policy will be made publicly available, and how documentation pertaining to the LWP will be kept.

Smart Snacks in Schools

Technical Assistance:

- At the time of the on-site review there were no competitive foods or beverages sold. 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. Fundraiser tracking tools can be found on the [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).

Professional Standards

Commendations:

- The food service director ensures that all food service staff, other school staff members, and teachers complete training annually pertaining to their roles in Child Nutrition Programs. These trainings are offered via in-services, individual review of written materials, and attending DPI SNSDC courses. It is highly encouraged to continue providing these training opportunities and seeking out additional opportunities on pertinent topics.

Technical Assistance:

Training Requirements

- The food service director utilizes an electronic tracking tool for professional standards hours. However, there are several pieces of information that the director should add to the tracking tool. 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.), and professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to the [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Food Safety

Technical Assistance:

Food Safety Plan Binder

- The food safety plan binder was kept in the main office where the food service director is seated. The plan was not available in the kitchen. While the plan was available for review upon request, it is highly recommended to keep a copy of the full plan in the kitchen where daily food service occurs. One major purpose of the food safety plan is for food service staff to use as a reference for food safety procedures. Keeping the plan in a location not readily accessible to food service staff somewhat defeats this purpose. Please work towards getting a copy of the food safety plan to keep in the kitchen.

Handwashing and Glove Usage

- During meal observation, it did not appear that staff were washing hands and changing gloves as frequently as they should. In some instances, staff put on or changed gloves without washing hands beforehand. Additionally, there were some instances when staff touched surfaces/items with gloved hands and returned to serving or handling food items without properly changing gloves in between. It is highly recommended to provide additional training to food service staff regarding handwashing and glove usage.

Employee Health 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>). The agreements on file were all from 2015 and appeared to cover all food handlers. While there are no requirements as to how frequently food handlers must sign an agreement, it is the best practice for each food handler to annually review and sign an agreement to reinforce the information contained in the document. Annual completion of an agreement also can help ensure that any new staff or teachers read and sign the form.

Milk Barrels

- The SFA uses insulated milk barrels with frozen inserts to serve milk at lunch. Currently, the food service staff throw away any milk left in the barrel at the end of service. While this is an acceptable

practice, it is also possible to utilize temperature monitoring with the milk barrels and save unserved milk at the end of lunch for future service—if proper monitoring procedures are followed. Please reference the [Use of Milk Barrels: Monitoring of Temperature Option](#) template standard operating procedure (SOP) on the DPI SNT Food Safety webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-barrel-temperature.docx>). Adopting this SOP could assist the SFA in minimizing food waste and allow for easier service of two milk types since unserved milk in the barrel would not necessarily need to be discarded under this plan. It is recommended to consult with the local sanitarian if wishing to implement this process and corresponding SOP. Alternatively, there is also a template SOP available for [Use of Insulated Milk Barrels: Time as a Public Health Control Option](#) that could be modified and added to the food safety plan (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-time.doc>).

Findings and Corrective Action Needed: Food Safety

- ❑ **Finding G:** The food safety plan did not contain a site-specific standard operating procedure (SOP) pertaining to the milk barrel used at lunch.

Corrective Action Needed: Develop an SOP for the milk barrels and add to the food safety plan. See technical assistance for Milk Barrels above. Submit the SOP as an attachment to assigned DPI Nutrition Program Consultant via email.

Buy American

Technical Assistance:

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products.
- The Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](#) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. More information on this new requirement, including a tool to assist with tracking noncompliance 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

- ❑ **Finding H:** The following products were identified in SFA’s storage area as non-domestic and were not listed on the SFA’s Buy American – Non-Compliant List or the SFA equivalent form, or did not have proper labeling to identify the country of origin:

- Frozen broccoli- Mexico
- Garlic powder- China

Corrective Action Needed: Please submit a copy of completed non-domestic documentation for products identified above, as well as any other products found in inventory. The following information must be recorded on a Buy American Non-Compliant Product List:

1. Date
2. Name of product
3. Country of origin
4. Reason

- a) **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
 - *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
- b) **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
 - *Ex. Blueberries are not available domestically during the months of December – June.*
- c) **Availability** – Product(s) is not available to purchase domestically.
 - *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
- d) **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
 - *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
- e) **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
- f) **Other**- Please provide a written explanation.
 - *Ex. The SFA received a donation of non-domestic oranges*
 - *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

Additional information found to be beneficial may also be recorded. A suggested [Buy American – Non-Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american>). For more information on Buy American exceptions, visit the [Buy American Provision Memos](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos>).

Summer Food Service Program (SFSP) Outreach

Technical Assistance:

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at St. Mary School, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months, per 7 CFR 210.12 and 210.18.
- SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](#) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the USDA [Summer Food](#) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

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

Findings and Corrective Action Needed: SFSP Outreach

- ❑ **Finding I:** The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP), as required per 7 CFR 210.12 and 210.18.

Corrective Action: Submit a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please be specific and include details regarding the method of communication and timeframe for distributing SFSP outreach materials.

Wisconsin School Day Milk Program (WSDMP)

Commendations:

- The WSDMP is running very well at St. Mary School! All program requirements are being met, including acceptable point of service (POS) practices in the classrooms. In the classrooms observed, teachers took care to check off students on the electronic tracking sheet after each child received their milk thus constituting a reliable POS.

Technical Assistance:

Wisconsin Produced Milk

- Per the Agreement for the WSDMP, the SFA agrees to serve Wisconsin-produced milk. The SFA should check with the distributor or co-op to verify that the milk received is fully or partially Wisconsin-produced. It is recommended to obtain this verification in writing for future reference. It may also be advisable to include the “Wisconsin-produced” stipulation in the SFA’s milk bid.

Substitutions

- The SFA currently does not have a need to make any milk substitutions in the WSDMP. However it is important to note that the only allowable substitution for milk in WSDMP is eight fluid ounces of full strength fruit or vegetable juice which may be offered when a child has a documented allergy to milk, metabolic disorder, or other conditions which prohibits him or her from drinking milk.

Findings and Corrective Action Needed: WSDMP

- ❑ **Finding J:** There is not a Wisconsin School Day Milk Program agreement on file with DPI in the permanent file.

Corrective Action: Complete and submit an updated [agreement](#) to the consultant for approval (<https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf>).

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>).

