USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. Maria Goretti School Agency Code: 13-7645

School(s) Reviewed: St. Maria Goretti School

Review Date(s): November 20-21, 2017 Date of Exit Conference: 11/21/17

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

• Determine whether the SFA meets program regulations,

- Provide technical assistance,
- Secure needed corrective action.
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state 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, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI 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 <u>School Nutrition Training</u> 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 <u>Healthier School Day: The School Day Just Got Healthier</u> webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.US Department of Agriculture.gov/healthierschoolday).
- The Smarter Lunchrooms Movement 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).

Appreciation/Commendations:

Thank you to the Food Service Director and staff for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. Everyone was 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 FSD is extremely organized which made the on-site visit run smoothly.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations

There was only 1 application that was on file for the October review period. The application was submitted after carryover and was not included in Verification. It was determined correctly.

<u>Technical Assistance/Compliance Reminders</u>

• 9 eligibility determinations were reviewed, 0 errors.

Verification

Commendations

Verification was not required as there were no applications on file as of October 1. The Verification Collection Report was completed correctly and submitted prior to November 15.

Meal Counting and Claiming

Commendations

The edit check is completed every day after lunch service and tracked for the month. The edit check was well done. The lunch claim was completed correctly and in a timely manner as well. Great job!

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Thank you to the food service staff at St. Maria Goretti for providing documentation prior to the review. Documentation was thorough and well organized. All of my questions were answered very quickly which helped to expedite the process of reviewing meal pattern compliance. I was impressed with the knowledge of weight versus volume and that meat/meat alternate products were properly weighed to determine the portion size needed. Your dedication to serving students makes a difference!

Technical Assistance and Program Requirement Reminders

Documentation

In order to accurately document the items that were offered as part of the reimbursable meal, items should be recorded by type on the production. This is especially important for something like the

dinner roll, where a 1 oz eq or 1.75 oz eq variety may be offered. Additionally, rather than documenting than an individually wrapped grain option was offered, the specific production should be recorded.

Meal Pattern Crediting

A "Child Nutrition Statement" was submitted for the Sara Lee Whole Grain Croissant. However, as this product is not Child Nutrition (CN) labeled, it can either be credited with a signed product formulation statement (PFS) or by using Exhibit A. The documentation submitted is not sufficient to qualify as a PFS as it does not provide the total amount of creditable grain. Therefore, without an acceptable PFS, the product must be credited as 1.75 oz eq of grain using Exhibit A.

The applesauce offered during the on-site review was pre-portioned into 4 fl oz cups. However, these cups were not full and when measured, they provided less than $\frac{1}{2}$ cup of fruit. In order to ensure a $\frac{1}{2}$ cup serving was provided, the cup would need to be filled to the brim. Therefore, it is recommended that a 4.5 fl oz or 5 fl oz cup is used to more easily contain the necessary amount of fruit/applesauce.

Findings and Corrective Action Needed

☐ Finding #1: Production record template does not meet all of the <u>production record requirements</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). The following information was missing from the template or incompletely filled in:

- Planned number of servings for each menu item
- Actual number of portions prepared AND amount prepared (in purchase units) for each item
- Substitutions made for students with special dietary needs

While there is no required <u>production record template</u>, we do have one available on our website that meets all of the requirements that you may choose to use (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

Corrective Action Needed: Please submit one week of completed production records on a template that fulfills all of the production record requirements.

☐ Finding #2: Two or three grain options are offered daily with the salad bar entrée. However, students are only allowed to select one option. This resulted in a weekly grain shortage for the salad bar entrée (only 6.25 oz eq of grain were offered).

As a weekly grain shortage was found during the previous administrative review, this is a repeat violation and will result in fiscal action. The salad bar meals from one day during the week of review will be reclaimed.

Corrective Action Needed: Submit a written statement describing your plan for correcting this weekly shortage. You may choose to allow students to take two grain options with the salad bar entrée one or more days during the week or re-arrange the line to allow students to select from the main entrée options and then select fruits and vegetables from a "garden bar."

☐ Finding #3: No vegetables from the beans/pea subgroup were offered on the salad bar line during the week of October 23-27, 2017. The salad bar production records for the rest of the month were also reviewed and beans were only offered on 10/18, 10/19 and 10/20.

Corrective Action Needed: Submit a written statement outlining your plan for ensuring that at least $\frac{1}{2}$ cup of vegetables from the bean/pea subgroup is offered each week. Specifically indicate what will be offered on the salad bar on the menu week that baked beans are offered on the main line (be specific

with the item, portion size and day/s that it will be offered). Keep in mind that the serving utensil is a reflection of the planned portion size.

☐ Finding #4: Graham crackers, crediting as 1 oz eq, were offered on the salad bar three times during the week of review. This exceeds the 2 oz eq grain based dessert limit for the week.

Corrective Action Needed: Submit one week of salad bar production records documenting the specific grain items offered each week to show that the grain based dessert limit was met.

☐ Finding #4: Nine meals were observed consisting of only the cheese quesadilla and applesauce cup. Due to the applesauce cup being short of ½ cup of fruit, these meals were not reimbursable.

Corrective Action Needed: These meals will be disallowed. No further action needed.

3. RESOURCE MANAGEMENT

Commendations

The SFA has an Unpaid Meal Charge Policy in place and it has been well communicated with households. The SFA purchased new kitchen cabinets in the 2016-17 school year. Since the school and parish each have their own kitchens, this is an allowable expense to the food service account. No one else is allowed to use the school kitchen, for liability reasons.

Paid Lunch Equity (PLE)

Commendations

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. Great job running this tool!

Revenue from Nonprogram Foods

Commendations

The sale of nonprogram foods meets the USDA requirements. The SFA is selling all nonprogram foods at prices that cover the food costs, labor, utilities, and any other costs incurred. The USDA Nonprogram Revenue Tool was completed using the 2016-17 Child Nutrition Program Report numbers and shows the SFA is in compliance of the nonprogram foods regulation.

<u>Technical Assistance/Compliance Reminders</u>

- Nonprogram foods sold at St. Maria Goretti include: Adult Meals, Extra Entrees, and Extra Milk.
- The <u>DPI Nonprogram Food Revenue Tool/Calculator</u> located on our website 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).
- It is advised to use the DPI Nonprogram Food Revenue Tool to make sure you are covering your costs for those nonprogram foods, annually or when you get new a la carte products.

Findings and Corrective Action Needed:

Finding #1: There were students taking a non-reimbursable lunch (typically the entrée and a milk) but
were being charged a non-reimbursable price, \$3.50. Students should be charged for each item
individually. They cannot be charged for a bundled non-reimbursable meal under the Smart Snacks
regulation. This is the same for students that go through the salad bar and do not have a reimbursable
meal.

Corrective Action Needed: Submit a statement as to how you will be tracking and charging students for each item they take that is not part of a reimbursable meal.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed at the beginning of the school year for all staff involved with the School Nutrition Programs and eligibility statuses. The PI 1441 form was completed correctly and done prior to the October 31 deadline. All Special Dietary Needs forms are kept on file. Currently, they have a few students with gluten allergies, with forms on file signed by a medical practitioner.

Technical Assistance/Compliance Reminders

And Justice for All Poster

• "And Justice for All" posters need to be posted in public view where the program is offered.

Special Dietary Needs

There is a table that is referred to as the "peanut free" table. It is advised to refer to this table as "peanut aware" instead. You cannot guarantee that the table is peanut free 100% of the time.

Overt Identification

• The meal program must prevent overt identification of students receiving free and reduced price benefits. It was noted that for field trips, only the free and reduced students are offered a lunch which is a form of overt identification.

Findings and Corrective Action Needed:

Finding #1 : If you are offering lunch to students for field trips, you should be offering a lunch to all students, not only for free and reduced eligible students. This is form of overt identification. It is also a best practice to offer a lunch on all field trip days that are considered a full day of school.
Corrective Action Needed : Submit a statement as to how you will be offering a lunch to all students for field trips and prevent overt identification regarding field trips.
Finding #2 : The And Justice for All poster was posted in the kitchen. Since the kitchen is not open every hour of the day, the poster needs to be moved to a public space such as the cafeteria or adjacent hallway.

Corrective Action Needed: Post the poster in the cafeteria or on the bulletin board in the hallway. This was completed on site, **no further action required**.

☐ **Finding #3**: The price for a lunch shows on the computer screen. It shows when a student has no charge for a lunch, \$0.00, indicating that the student is free eligible. This is a form of overt identification which is unallowable.

Corrective Action Needed: Work with the software company to remove the price or purchase a privacy screen to only allow the cashier working the computer to have access to students' lunch prices. Submit a statement confirming what you have done to eliminate the overt identification.

Local Wellness Policy

Commendations

The SFA does have a Wellness Policy in place but needs updating to be in compliance.

Technical Assistance/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidencebased strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Refer to the USDA <u>summary of the requirements</u> for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf Refer to the <u>Local Wellness Policy Checklist</u>: (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf)

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

Technical Assistance

LWPs should include specific goals related to:

- 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 review and update Local Wellness Policy (1002)

The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. Your SFA has not reviewed nor updated your policy within the past three years. Additionally, your SFA does not have documentation indicating when and how the plan is/will be reviewed and updated.

SFA is required to complete an assessment of the Local Wellness Policy (1005)

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). A sample model wellness policy is available at the <u>USDA Wellness Policy webpage</u> (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 <u>Wisconsin Health Atlas webpage</u> (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the <u>Wellness School Assessment Tool</u> (WellSAT) for assistance in assessing the LWP (http://wellsat.org/).

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

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule. Submit this via email.

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption.

An entree is exempt from Smart Snacks standards on the day it is served and the following day. This exemption applies only to the planned entrée and does not extend to other side items. Additionally, items may not be bundled and sold for a unit price as this negates the exemption and the bundle would then be required to meet Smart Snacks standards. The <u>Alliance for a Healthier Generation Product Calculator</u> can be used to determine product compliance

(https://www.healthiergeneration.org/take_action/schools/snacks_and_beverages/smart_snacks/alliance_product_calculator/).

Professional Standards

Commendations

The Food Service Director is doing a wonderful job making sure staff are getting their required training hours at the beginning of the school year, that pertain to their job duties. All trainings are tracked using an Excel spreadsheet. These are well organized and contain all of the required criteria.

Food Safety, Storage and Buy American

Commendations

The Food Safety manual was completed and site specific. It had all of the required components including the list of Process 1, 2, and 3 foods, list of kitchen equipment, and the necessary SOPs. The temperature logs for the dish machine, coolers and freezers were also well documented and well organized.

Technical Assistance/Compliance Reminders

The USDA requires that a 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 as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that 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 the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not preapproved in writing by the food service director be 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 manufacturer that poor market conditions exist (weather, and/or supply
 availability of market); this requirement applies to private labels as well as other labels.
- 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 (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america).
- 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. Refer to SP 24-2016 for
 more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the <u>SNT Procurement webpage</u> (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action:

Finding #1: Standard operating procedures (SOPs) for Field Trips was not included in the Food Safety manual.

Corrective Action Needed: Print a copy of the <u>Field Trip SOP</u>, discuss with staff, and add it to the Food Safety manual. Submit a statement in writing this has been completed (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx).

Finding #2: Most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action Needed: Post most recent food safety inspection report in location visible to public. This was completed on-site. **No further action required.**

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

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

Summer Food Service Program (SFSP) Outreach

Technical Assistance/Compliance Reminders

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. Maria Goretti, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the <u>summer meals locator</u> 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 <u>Summer Food</u> website (http://www.fns.usda.gov/summerfoodrocks)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the <u>interactive map</u> 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

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program

Commendations/Comments/Technical Assistance/Compliance Reminders

- The October claim was submitted correctly.
- The pre-k students are only allowed to have white milk as part of the new CACFP meal pattern guidance.

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 <u>Wisconsin DPI Every Child a Graduate</u> webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!