USDA Child Nutrition Programs
Administrative Review Summary Report

School Food Authority: St. Mary's School

Agency Code: 227706

Review Date(s): February 28, 2019

Date of Exit Conference: February 28, 2019

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 a nominal 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](#) 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 webpage](#) (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

- Wisconsin Team Nutrition is hosting a *Teaming Up to Increase Participation* workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is $30. More information about the workshop is available on the [School Nutrition Training](#) webpage (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Mary's School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. 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 school nutrition staff are doing a great job running the National School Lunch Program and School Breakfast Program. All staff were receptive to recommendations and guidance. The DPI review team is confident that St. Mary's School will continue to improve its knowledge and operation of school meals programs.

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REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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Commendations:
- ✓ All applications are approved and denied correctly. Great work!
- ✓ Benefits are accurately transferred from Benefit Issuance (BI) list to point of service (POS) system.

Technical Assistance:
- The BI list must contain the following: free and reduced student names, meal eligibility status (free or reduced), eligibility approval date, and the means of qualification for benefits (Direct Certification (DC), applications, categorically eligible).
- In the event of an eligibility/benefit status change, if a meal benefit decreases (e.g. reduced to paid), the household is to be given **ten days** before the benefit decreases. If a meal benefit increases, (e.g. reduced to free), the change must be made in **three days**.
- **DC must be run a minimum of three times per school year**:
    - o Initial run prior to the beginning of the school year
    - o Three months after initial run
    - o Six months after initial run
- Ensure the Determining Official signs denied applications. Also, please note that households with an approved application may be notified verbally or in writing. **Households with a denied application must be notified of the denial in writing.**
- Households *cannot* be targeted to fill out free and reduced meal applications. All households are to be given the application packet at or prior to the beginning of the school year and may be made available in other routes that do not overtly identify households that want to fill out the application. If a household does not fill out the application, the SFA cannot directly contact this household to encourage it be filled out. The applications are also not required to be filled out by any household; the application is optional.
- The application packet sent out at or prior to the beginning of the school year cannot include the public release. This packet must contain the following: Free/Reduced Meal Application, Application Instructions, and the FAQ sheet. The Sharing Information form is optional, but highly encouraged.
- For the student approved for reduced meal prices via an application when he/she was actually categorically eligible for free meal, it is best practice to refund the household for the reduced priced meals served this school year.

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Findings and Corrective Action Needed: Certification and Benefit Issuance

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❑ **Finding #1**: There was one student approved for reduced meal prices via an application. However, this student was actually categorically eligible for free meals via the application.

Corrective Action Needed: Once the household notification letter about this benefit change has been sent, please submit it to the consultant assigned to your review. Additionally, resubmit your BI list with this eligibility status change. On the BI list, ensure the F/R status of each student is listed.

Resources:
- [Free/Reduced Applications and DC webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts#fr) (https://dpi.wi.gov/school-nutrition/training/webcasts#fr)

Verification

Commendations:
- ✓ Verification was completed by November 15.
- ✓ The Verification Collection Report (VCR) was submitted and contains the accurate results of Verification.
- ✓ The Verification packet was utilized to accurately complete the Verification process. Great work!

Technical Assistance:
- Gross income is considered on supporting income documentation for the Verification process. Net income is not considered.

Meal Counting and Claiming

Commendations:
- ✓ Month of review meal counts are comparable to the NSLP and SBP claims for reimbursement.
- ✓ Day of review's meal counts are comparable to the review period's meal counts.
- ✓ All meals observed were reimbursable. Great work!

Technical Assistance:
- As a reminder, points taken at the POS must be *as* students come through the line, not before or after. Please ensure that teachers are reminded of this requirements and that students may not be marked off before they have completely gone through the service line.

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ **Finding #2**: Edit checks are currently not completed. These must be completed monthly prior to submitting monthly claims for reimbursement.

> **Corrective Action Needed**: Please send February's Edit Check to the consultant assigned to your review. A template Edit Check is under *Resources* of this section.
>
> ❑ **Finding #3**: Breakfast point of service (POS) is currently in the classrooms where teachers take meal and a la carte counts. Breakfasts are grab n' go from the foodservice kitchen and then brought to classrooms where meals and a la carte items are marked off. While the review team is confident in the meal and a la carte counts at breakfast, the POS system needs adjusting so that counts are taken where meals and a la carte items are served.
>
> **Corrective Action Needed**: Please submit an explanation of the new POS system, the date of its implementation, and any documentation related to the notification of teachers and staff.

Resources:
- [Monthly Edit Check form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming)

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2.   MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations
Thank you to the Food Service Director and Food Service Manager at St. Mary's School. We appreciate your time and efforts spent preparing for and participating in the onsite review. All documentation submitted for the week of review was thorough and organized. Staff were receptive to all feedback and asked many great questions during the onsite review. Although the school is small, it is great that you continue to participate in the School Breakfast Program to provide your students with the nutrition they need to start their school day. Thank you for all that you do for the students of St. Mary's School!

Comments/Technical Assistance/Compliance Reminders

Training
- Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage, under Upcoming Trainings (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts) webpage (https://dpi.wi.gov/school-nutrition/training/webcasts).

Crediting and Documentation
- The [USDA Food Buying Guide for Child Nutrition Programs](#) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods)

(https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on "food items search" and type in a specific food in the "keywords" search box. Many different options may appear. Find the one that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.

- The FBG also provides the raw to cooked yields for products, which is essential when developing standardized recipes that provide the desired crediting.
- Most fruits and vegetables credit by volume served (e.g., ½ cup peaches, drained will credit ½ cup fruit) and the FBG will note if the crediting is different based on volume served (e.g., one medium banana credits ½ cup fruit). Most meat/meat alternates and grains credit by weight (i.e., 2 ounces of cooked, plain chicken breast credit 2.0 oz eq meat/meat alternate; 1 ounce brown rice credits 1.0 oz eq grain). If the product is not listed in the FBG, additional crediting documentation is required.
- Processed foods that are not listed in the FBG must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting.
- A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).
- A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that include these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.
- Collect new product labels annually and update records when new products are purchased. More information about crediting documentation can be found on the NSLP Menu Planning webpage, under the Child Nutrition Labels and Product Formulation Statements heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).
- The Crediting in a Nutshell handout provides a concise overview of the crediting basics (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf).

Two Methods of Crediting Grains
- Grains can be credited based on weight using Exhibit A (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf). If a product is not listed in Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the *grams of creditable grain* in the product.
- Exhibit A is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1.0 oz eq for each specific group. Exhibit A groups all grain products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:
    - Group A: these products are hard and crunchy, dry and lightweight. Per ounce, they contain a good deal of grain.
    - Group B: whether serving bagels, pizza crusts or tortillas, 1.0 ounce of these products all credit the same towards the meal pattern (1.0 ounce by weight = 1.0 oz eq grain).

- o Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1.0 ounce of pancake does not credit as 1.0 oz eq like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz eq grain.
- Exhibit A can be used to credit any of the products that appear in the table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

Weight versus Volume
- As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). The fact that spoodles, which are used to measure volume, are often referred to as a "4 oz spoodle" for example, makes this somewhat confusing. A 4 oz or ½ cup spoodle is actually 4 fl oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly. Please refer to the table below for a comparison.

	Measures	Measured In	Conversions	Tools Used
WEIGHT	Meat/meat alternates Grains	*Ounces (oz)* Grams (g) Kilograms (kg) Pounds (lb or #)	1 lb = 16 oz 1 oz = 28 g	Scale
VOLUME	Fruits Vegetables Milk	*Fluid ounces (fl oz)* Tablespoon (T or TBSP) Teaspoon (t or tsp) Cups (c) Pint (pt) Quart (qt) Gallon (gal) Liter (L)	3 tsp = 1 TBSP 16 TBSP = 1 c 1 c = 8 fl oz 1 pint = 2 c 1 quart = 2 pints 1 gallon = 4 quarts	*Spoodles,* measuring cups, measuring spoons, scoops, dishers, ladles

*WEIGHT AND VOLUME ARE NOT EQUAL OR INTERCHANGEABLE… OUNCES ≠FLUID OUNCES

Serving Sizes
- Servings sizes and crediting for fruits and vegetables that do not fit neatly into measuring utensils may be determined using the USDA Food Buying Guide or by performing and in-house yield study (https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs). The specific and verifiable procedures, which must be followed, are available on the Menu Planning webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy).
- Baby carrots are offered daily at lunch. The production records show a planned serving size of three, but no corresponding volume. The process for the in-house yield was shown onsite to determine the volume. The three baby carrots were diced and placed into a measuring utensil to determine the volume. This should be repeated using the in-house yield procedures to obtain the average volume.
- The School Nutrition Team (SNT) has a Salad Bar Signage Template with pictures that can be posted on a salad or garden bar (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).

Production Records
- Consider adding specific information for menu items, such as the brand, product number, or recipe number.
- It is helpful to document crediting on the daily production records. However, the crediting being filled in under each component is not done correctly. Currently, an X is being recorded under the respective components. Instead, the actual creditable amount should be recorded to accurately show how the menu items are crediting toward the meal pattern.
- Either the number of servings prepared or quantity (in purchase units) prepared is being recorded. Both the number of servings and quantity prepared must be recorded for all menu items. Consider splitting your "amount prepared" column, adding a column to the current production record template, or using a new template.
- The lettuce and carrots offered daily need both the number of servings prepared and the quantity (in purchase units) prepared.
- The Chicken and Gravy offered during the week of review should be listed separately on the production record if served as separate items or a standardized recipe should be created if they are served mixed together.
- A list of production record requirements ("Must Haves and Nice to Haves") and sample production record templates can be found on our Production Records webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

Vegetable Subgroups
- Vegetables are grouped into the respective subgroups based on nutrient profile. Refer to the Vegetable Subgroup handout for the subgroup classifications for commonly eaten vegetables. This handout may also be used when looking for new vegetables to add to the menu (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf).
- Tomato sauces and salsa may be credited toward the red/orange vegetable subgroup when they have a planned serving size of at least ⅛ cup.

Milk on Monthly Menu
- The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal.

Seconds at Lunch
- Discontinue the practice of offering second servings free of charge to students. Offering second servings complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly averages. If students are still hungry, second servings may be sold a la carte. Side dishes can also be sold a la carte if they meet Smart Snacks standards.
- Schools may allow greater amounts than the required minimums by offering self-service or allowing seconds servings of fruits and vegetables. Additional offerings do count towards the weekly calories limits, but because fruits and vegetables are generally lower in calories, they can be excellent sources for satisfying meals and sustaining energy.

A la Carte at Breakfast
- Consider providing additional education on the breakfast program for both students and parents. While offering your students the option to purchase a la carte items is a great accommodation for

those whom may only want a morning snack, it may boost participation to promote what is all included with a reimbursable meal.
- Introducing more breakfast options may encourage more students to select a full reimbursable meal. The Breakfast Menu Planning webpage contains links to resources that may provide ideas for additional breakfast menu items (https://dpi.wi.gov/school-nutrition/school-breakfast-program/menu-planning). Your distributor or neighboring school districts may also be able to provide ideas on what works well in other schools.

Standardized Recipes
- USDA's *What's Cooking?* recipes include nutritional and crediting information (https://whatscooking.fns.usda.gov/). They are a great resource to use in USDA School Meals Programs for cooking healthy and tasty recipes. Note: even though USDA refers to these as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they have been tried, tested, and adapted to your food service operation.
- Additional resources, such as templates, the standardized recipe checklist, and links to additional recipe databases are available on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

Resources
- Lunch "In a Nutshell" (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf)
- Breakfast "In a Nutshell" (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-in-a-nutshell.pdf)
- Offer versus Serve webcast (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html)
- Offer versus Serve - Meal or No Meal PowerPoint presentation or webcast (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx; https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html)
- Breakfast OVS Handout (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf)

Wisconsin Team Nutrition Workshop
- The school nutrition manager is encouraged to attend Wisconsin Team Nutrition's Teaming Up to Increase Participation workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is $30. More information about the workshop is available on the School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Meal Pattern Finding 4:** The Apple Cinnamon Nutri-Grain Bar offered on the breakfast menu credits as less than 1.0 ounce equivalent (oz eq) of grain and the clementine offered credits as ⅜ cup fruit. These menu items alone do not meet the daily requirements for the grain and fruit components without being bundled with other grains or fruits. This Nutri-Grain bar and the clementine also cannot be counted as items at breakfast without being bundled with other grains or fruits. An item is defined as 1.0 oz eq grain, 1.0 oz eq meat/meat alternate, ½ cup of fruit/vegetable, or 1 cup of milk). While this did not result in grain or fruit shortages at breakfast during the week of review, action should be taken to ensure this does not result in non-reimbursable meals going forward.

Corrective Action Needed: Submit a statement explaining what will be done with these items to ensure that students are not able to select them as items at breakfast.

❑ **Meal Pattern Finding 5:** Recipes should be updated to reflect current practices and products. Standardized recipes exist, but a couple are not accurately reflecting what is happening in the kitchen.
   - The Spaghetti and Meat Sauce recipe submitted for the week of review is written so that the pasta and sauce are served together, but it is being served separately at the school. Additionally, not all the spices called for in the recipe are actually being used.
   - The biscuit recipe calls for enriched flour, but it was stated that a 50/50 blend of whole wheat and enriched flour is actually being used.

Corrective Action Needed: Submit recipes for the Meat Sauce and Biscuit showing revisions based on what is actually happening at your site. For more information on what essential information must be on a standardized recipe, review the [Standardized Recipe Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf).

❑ **Meal Pattern Finding 6:** There is currently no breakfast menu communicating what is offered as part of a reimbursable breakfast. If the breakfast menu remains very similar each day, this could be done by adding a statement to the lunch menu explaining that breakfast is offered daily and students may select from a variety of whole grain-rich items, fruit, and milk.

Corrective Action Needed: Submit a copy of an updated menu that includes the breakfast information.

❑ **Meal Pattern Finding 7:** Signage must indicate that students must select at least ½ cup fruit and/or vegetable, or a combination with a reimbursable meal. Currently, the breakfast signage does not list this. Additionally, the posted breakfast signage does not specify the number of food items that each menu item is planned as nor the number of items from each component that students may select. Instead of altering your impressive posted breakfast sign, consider adding a smaller sign to your serving counter. Samples of signage that can be printed can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) web page (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

As a reminder, Under Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered from the three components (grain [and optional meat/meat alternate], fruit/vegetable, and milk). An item is defined as 8 fluid ounces of milk; ½ cup of fruit and/or vegetable; and 1.0 ounce equivalent (oz eq) of grain (and optional meat/meat alternate). Visit the [Breakfast Menu Planning](https://dpi.wi.gov/school-nutrition/school-breakfast-program/menu-planning) webpage, under the OVS heading for additional guidance (https://dpi.wi.gov/school-nutrition/school-breakfast-program/menu-planning).

Corrective Action Needed: Submit a photo of posted breakfast signage that includes the ½ cup fruit, vegetable, or combination statement and communicated the number of food items for each menu item.

SMART SNACKS

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. The school day is considered the period from the midnight before to 30 minutes after the end of the instructional school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption.
- There are two situations by which an organization may sell foods and beverages to students during the school day.

    1. If they are selling foods or beverages that **meet** the Smart Snacks standards:

        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 may include 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 they are selling foods or beverages that **do not meet** the Smart Snacks standards:

        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. 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).
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. 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).
- Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.
- The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to

establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Buy American

Comments/Technical Assistance (TA)/Compliance Reminders
- The USDA requires that an 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 is identified on the label, than SFA must get certification from the distributor or supplier stating: "We certify that (insert product name) 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 accepted within an email.
    - The label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the 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 pre-approved 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 the 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 and Buy American monitoring procedures can be found in the [Contract Management](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/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](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring).

- 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.
- For domestic products without country of origin labeling (COOL), consider the Buy American Provision Attestation for Agricultural Product(s) Purchased Between School and Contractor (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the Buy American Provision webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).
- More information on this new requirement can be found on the SNT Procurement webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed: Buy American

- ❑ **Buy American Finding 8:** The following product was identified in the SFA's storage area as non-domestic and was not documented:
    - Mandarin oranges (China)

Corrective Action Needed: Complete and submit a Non-Compliant Product Form for the product listed above.

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3. RESOURCE MANAGEMENT

Non-profit School Food Service Account

Commendations:
- ✓ All revenues and expenditures made to the school food service account are allowable; indirect costs are also not charged, as these are unallowable in Wisconsin.

Technical Assistance:
Annual Financial Report
- **The AFR is a reflection of the Non-profit School Food Service Account (Fund 50) and must be completed accurately.** The revenues and expenditures within the AFR must be reported by program (NSLP, SBP, Non-Program Foods, etc.) and by category (labor, foods, etc.). Reference the resources below for more details.
- **The beginning and ending fund balances on the AFR *must* match the Fund 50 ledger.** The beginning fund balance is July 1 of the current year and the ending fund balance of June 30 of the next year.
- **The entitlement value of USDA Foods** (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP. Any handling and processing fees must be recorded as a School *Purchased Services* Expenditure.
    - o The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our Online Services webpage (dpi.wi.gov/nutrition/online-services).
- Indirect costs do not include training fees. These fees are allowable costs to the food service account and would be reported on the AFR under "other".

- Scrips are beneficial as they refund an amount of credit for shopping at a particular store. **Utilizing Scrips is allowable for food service, so long as these refunds are put back into the food service account.**
- Checks or any form of payment from households for meals/snacks *cannot* be entered in Fund 50 as revenue until the meal/snack has been taken by the student. Only at this point, can funds be considered revenue in Fund 50.

Unpaid Meal Charges and Bad Debt
- When local officials determine collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as "bad debt."
- When this uncollectible debt becomes bad debt, it is written off as an operating loss.
- Food service funds may not be used to cover costs related to the bad debt.
- These losses must be restored using non-federal funds such as the school district's general fund, so a transfer must be made into the Nonprofit School Food Service Account to cover the loss.

Findings and Corrective Action Needed: Non-profit School Food Service Account

❑ **Finding #9**: The revenues, expenditures, and the beginning and ending fund balances reported on the AFR did not match the SFA's school food service ledger.

Corrective Action Needed: Please submit corrected AFR revenues, expenditures, and fund balances to the consultant assigned to your review. Submit an explanation of a new financial management system St. Mary's School plans to use going forward to ensure AFRs are completed as accurately as possible going forward.

Resources:
- [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)
- [AFR Instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf)
- [AFR *In A Nutshell*](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx)
- [AFR Webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#afr) (https://dpi.wi.gov/school-nutrition/training/webcasts#afr)
- [AFR Expenditure Categories](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc)

Paid Lunch Equity (PLE)

A comprehensive review of this area was required due to a positive or zero food service fund balance as of January 31, 2018. No further action is required.

Commendations:
- ✓ Student lunch prices match the on-line contract and PLP report.
- ✓ Adult meal prices are appropriate based on the adult meal price requirements.

<p style="text-align: center;">**Revenue from Non-program Foods**</p>

Technical Assistance:
- Non-program foods include adult meals, extra milks, a la carte items, and anything else sold to students outside the reimbursable meals.
- The non-program foods revenue tool is required if a school sells non-program foods beyond adult meals and extra milks. This tool is used to ensure all costs associated with non-program foods are covered by their revenues.

Findings and Corrective Action Needed: Revenue from Non-program Foods

❑ **Finding #10**: The non-program foods revenue tool was not completed by St. Mary's School. It was required as students are able to take a la carte items at breakfast.

Corrective Action Needed: Complete this tool using a 5-day reference period and submit it to the consultant assigned to your review.

Resources:
- [DPI's non-program foods revenue tool/calculator](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx)

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4. GENERAL PROGRAM COMPLIANCE

<p style="text-align: center;">**Civil Rights**</p>

Commendations:
- ✓ Thank you for completing the Public Release.
- ✓ The Civil Rights Self-Evaluation Compliance form (PI-1441) was completed.

Technical Assistance:
- The Public Release is to be distributed to the following locations, as applicable:
  - o Media outlets (the SFA is not required to pay any publication fee)
  - o Grassroots organizations
  - o Employers experiencing or expecting large layoffs
- As a reminder, the PI-1441 is to be completed by **October 1** annually.

Compliance Reminders:
- **Civil Rights training is required for all food service employees and any staff involved in the meal programs** (approving applications, financial management, access to free/reduced information, etc.).
- All program materials and information that is made public (posted, sent to households) *must* contain the USDA Non-Discrimination Statement. There is a shortened version available if the longer version does not fit on program materials: ***This institution is an equal opportunity provider.***

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│         Findings and Corrective Action Needed: Civil Rights           │
│                                                                       │
│   ❑ Finding #11: The Hearing Official (HO) did not complete the       │
│   Civil Rights training.                                              │
│                                                                       │
│   Corrective Action Needed: Please have the HO complete the training  │
│   and submit this to the consultant assigned to your review.          │
│                                                                       │
│   ❑ Finding #12: The non-discrimination statement is inaccurate on    │
│   the following documents: the Local Wellness Policy and the "St.     │
│   Mary Breakfast and Hot Lunch Program" document sent to households.   │
│                                                                       │
│   Corrective Action Needed: Please submit these updated documents to  │
│   the consultant assigned to your review.                             │
│                                                                       │
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Resources:
- [USDA Non-Discrimination Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights)

Local Wellness Policy

Commendations:
- ✓ Food service staff have completed multiple Smarter Lunchroom Technique assessments. The benefits of completing these were apparent on site. Great work!
- ✓ A wonderful LWP is in place at St. Mary's School.

Technical Assistance:
- Any foods/beverages sold to students outside of the meal programs during the school day on the school campus must adhere to Smart Snack regulations. This language is to be included in the LWP; currently St. Mary's School does not sell foods/beverages to students outside of the meal programs. If St. Mary's School ever needs to follow Smart Snack regulations, language must be included in the LWP.

Professional Standards

Technical Assistance:
- Hour requirements
- Non-food service staff do not have to have hour requirements nor do their trainings need to be tracked. Job-specific training is required for any and all non-food service employees completing tasks related to the meal programs (POS counts, submitting claims, financial management, etc.).

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│      Findings and Corrective Action Needed: Professional Standards    │
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│   ❑ Finding #13: Professional Standards trackers are not maintained   │
│   for food service employees.                                         │
│                                                                       │
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> **Corrective Action Needed:** Complete this for the full time food service employee and the food service director.

Resources:
- [Professional Standards webpage](https://dpi.wi.gov/school-nutrition/professional-standards)(https://dpi.wi.gov/school-nutrition/professional-standards)
- [Professional Standards *In A Nutshell*](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf)
- [Professional Standards Training Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf)
- [DPI SNT Professional Standards Training Tracker](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx)

Food Safety and Storage

Commendations:
- ✓ Storage violations were not observed.
- ✓ The food safety plan was site-specific and contained all required components (processes 1, 2, and 3; updated and signed employee reporting agreements; and all relevant Standard Operating Procedures (SOPs)).
- ✓ Temperature logs were maintained and all temperatures were appropriate.
- ✓ Two food safety inspections occurred in the previous school year.
- ✓ The most recent food safety inspection report was publicly posted.

Technical Assistance:
- All food must be stored in NSF food grade storage containers. Reuse of plastic packaging containers which contained purchased food may not be used per Wisconsin food code. "Single-use articles" means utensils and bulk food containers designed and constructed to be used once and discarded.

Reporting and Recordkeeping

Commendations:
- ✓ The VCR, FNS-10 report, PLP report, and AFR were all submitted.
- ✓ Records are maintained on file for the required three years plus the current school year.

Technical Assistance:
- For the FNS-10 report, ensure the "total number of students enrolled in NSLP" is accurately reported going forward.

Resources:
- [Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf)

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

Commendations:
- ✓ SBP outreach is completed by the SFA. Thank you!

Technical Assistance:
- SFSP outreach is to be completed prior to the end of the academic school year to inform families of where meals are offered during the summer months.

Compliance Reminders:
- A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, **USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months**. SFAs can inform families of summer meals via the following methods:
    - Promotion of the summer meals locator on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
    - Promotion of calling 211 to locate meals in the area
    - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
    - Promotion of the USDA Summer Food webpage (http://www.fns.usda.gov/summerfoodrocks)

Findings and Corrective Action Needed: SFSP

❑ **Finding #14:** SFSP Outreach is not completed by St. Mary's School.

Corrective Action Needed: Send a completed draft of the outreach poster to the consultant assigned to your review.

Resources:
- SFSP outreach poster (https://dpi.wi.gov/community-nutrition/sfsp/outreach)
- To access an inclusive map of all potential participating sites in your 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

"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 <u>Every Child a Graduate</u> webpage (<u>https://dpi.wi.gov/statesupt/every-child-graduate</u>)."

With School Nutrition Programs!