

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Good Shepherd Lutheran School Agency Code: 28-7951

School(s) Reviewed: Good Shepherd Lutheran

Review Date(s): December 20-21, 2017

Date of Exit Conference: Dec 21, 2017

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 Good Shepherd Lutheran School for the courtesies extended to us during the on-site review and for being available to answer questions and provide 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 DPI review team appreciates the willingness of the staff at Good Shepherd Lutheran School to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, service, local wellness, financial stability and staff training. We were impressed during meal service that the servers had such a pleasant demeanor with the students.

The DPI review team is confident that Good Shepherd Lutheran School will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance (TA)

- Forty-two eligibility determinations were reviewed with six student errors identified. These errors were corrected on site the same day. Thank you.

Free and Reduced Price Meal Applications

- Applications are reviewed in a timely manner, usually the same day and definitely within the required 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- This SFA is appropriately offering the 30 school day carryover of benefits from the previous school year or until a new determination is made for the household.
- (TA) When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with

jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Household Size Box

- (TA) The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

Incomplete Applications

- (TA) Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Application Forms

- Thank you for using the DPI prototype letters and application packet with the current non-discrimination statement.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Public Release

- (TA) All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced price meals are available. Thank you for submitting to the food pantry and church. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need, like food pantry, public library, church lobby)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Limited English Proficiency (LEP)

- 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 limited English proficiency.
- Thanks for providing household letters and application forms to families in Spanish, when needed.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsin 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 nonprofit 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.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

Transferring Students

- Transferring the eligibility determination between 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. 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. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year.
- (TA) Good Shepherd Lutheran School had a 14,3% certification error rate. More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** Three applications were determined without all of the required sections completed, including two with a missing last four digits of the social security number and two with the total household member number box not matching the number of names listed on the application in Step 1 and Step 3.

Corrective Action Needed: Please contact the households to secure the missing information.
Corrected onsite 12/20/17.

- ❑ **Finding #2:** The Confirming Official signed every application. Applications may have a second look for accuracy, but the only applications that should have the Confirming Official signature on the application is the application(s) pulled for the verification process.

Corrective Action Needed: Submit a statement of your application process moving forward, which includes the verification process.

Verification

Comments/Technical Assistance (TA)

- (TA) When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application. The Verifying Official signs the application at the end of the verification process.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Meal Counting and Claiming

Comments/Technical Assistance (TA)

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- (TA) When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- (TA) Meals should be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- The meal count and claim for the Review Month was correct, but need to perform the edit check monthly. This SFA uses Fast Direct.
- Please note that SFAs may claim visiting students in the paid category or the individual’s category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #3:** Before submitting the monthly claim, a required [edit check form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc) must be performed to identify that meals are counted correctly. The check is for the counts to be within the allowable number range when compared to the attendance adjusted rate of each meal eligibility status group (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc). Please look at the guidance on counting students who do not have access to the lunch meal every day, as found in the [Claiming Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/site-based-claiming-manual.pdf) on page 37 in Appendix A (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/site-based-claiming-manual.pdf).

Corrective Action Needed: Submit a completed Edit Check form for the month of onsite review (December, 2017) with an explanation of how the preschool 3 year olds are being calculated.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at Watertown Unified School District in cooperation with Good Shepherd Lutheran School for the organized, thorough documentation provided prior to the review. Having this information in advance helped to expedite the review process. The serving staff at Good Shepherd Lutheran are doing a great job. They were friendly and had positive interactions with the students throughout meal service.

Comments/Technical Assistance/Compliance Reminders

Documentation

For accurate documentation of items that were offered as part of the reimbursable meal, actual products served (e.g. fresh fruit type/s) must be recorded on the production record.

Production records used during the week of review did not document all required information. A list of production record requirements (“Must haves and Nice to haves”) can be found on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). This list requires that the planned number of portions, total purchase units prepared, total number of portions prepared and number of portions leftover are all included. However, the production record template in use only has columns for planned quantity, served quantity and leftovers. The planned quantity column is sometimes used to document total quantity, sometimes used for number of portions, and sometimes not completed. Leftovers are not being properly documented.

As Good Shepherd does not have offer versus serve (OVS), students must select all planned menu items. Therefore, on the production records, it is expected that the quantity of each item served matches the number of reimbursable meals served, which was not always the case. For some items, the quantity served was marked as “all”, but the planned quantity was more than the number of reimbursable meals actually served. For example:

- On 11/9, the actual number of students selecting the pizza entrée was 30, the planned quantity was 33 and it says that all were served.
- On 11/6, there were a total of 52 meals served; 3 cans of baked beans were planned which provides 70.5 ½ cup servings according to the Food Buying Guide, and all were served.

As a reminder, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the USDA *Food Buying Guide* for School Meal Programs. 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.

Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted.

- This requirement is outlined in the joint agreement template, #12: “The seller shall comply with all other requirements of their DPI agreement/application as it produces and makes available meals to the Purchaser, including providing the Purchaser with daily production/transport sheets indicating how menu items contribute to meal pattern requirements and *supporting documentation for contribution.*”

Recipes

Standardized recipes are required for all menu items that have more than one ingredient (mashed potatoes, gravy, Spanish rice, buttered rolls). All standardized recipes must include detailed information about the *specific* ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your food service operation. It produces *a consistent quality and yield* every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made or when optional ingredients are included. Both a weight and measure should not be included for each ingredient as they can be slightly different and result in inconsistent crediting. Instead, record weight OR measure based on how the recipe is prepared. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Meal Pattern Crediting/Portion size

The planned portion size for pork taco filling used on in the nacho recipe was a scant 3oz spoodle intended to provide 3.17 oz and therefore 2 oz eq meat/meat alternate (m/ma). Scant and heaping servings are not recommended as this makes it difficult to provide consistent portions. Rather, a different serving utensil should be used to ensure the planned portion is provided. This may mean using a scoop versus a spoodle or two scoops with a smaller utensil. For the pork taco filling, it was determined that a 2 oz spoodle provides 2.25 oz (1.25 oz eq m/ma), a 3 oz spoodle provides 3 oz (1.75 oz eq m/ma) and a #12 scoop provides 3.25 oz (2 oz eq m/ma).

It is important for serving staff to know how raw vegetables credit. Therefore, the quantity of each vegetable needed to credit as a specific volume must be determined. This can be done one of two ways. For example, to determine how many celery sticks equals 1/2 cup, either:

1. Dice up the celery sticks and determine the how many are needed to fill a 4 fl oz spoodle.
2. Calculate the weight of ½ cup of celery using the Food Buying Guide and determine the average number needed to provide that weight using a scale.

It is recommended that raw vegetable yields be determined by meal provider and this information be shared with the purchasing schools.

Pre-K students

Pre-K students come down to the cafeteria at the same time as the 7th-8th grade students. As this does not allow sufficient time for changing spoodle sizes, milk variety, etc., it was determined that it is acceptable for the school to follow the co-mingling flexibility and offer one menu to all students.

Milk Variety

A variety of milk, at least two allowable milk types, is required to be offered daily at lunch. Each student going through the line (including pre-k) must have access to a variety of allowable milk types. Allowable milk types in Child Nutrition Programs include nonfat (skim) unflavored milk, nonfat (skim) flavored milk (e.g., chocolate), and low-fat (1%) unflavored milk.

Breakfast participation and alternative service models

Good Shepherd Lutheran does not currently participate in the School Breakfast Program. Participation in the program is encouraged, as ensuring students have access to breakfast is beneficial for their health and academic success. Our [breakfast resources webpage](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>) has a lot of information about the different breakfast service and financial models for your reference. If you ever have questions on breakfast models or starting a program, please contact [Tracy Huffman](mailto:tracy.huffman@dpi.wi.gov) (tracy.huffman@dpi.wi.gov).

Findings and Corrective Action Needed

Finding #4: A complete standardized recipe was not available for the Spanish rice.

Corrective Action Needed: Develop and submit a standardized recipe for the Spanish rice.

Finding #5: Supporting documentation to show how menu items credit towards meal pattern requirements (recipes, labels, CN labels, PFS) are not available on-site.

Corrective Action Needed: Submit a written statement describing the plan for ensuring this information is available on-site at Good Shepherd Lutheran. It can be provided electronically or paper copy, at the beginning of the year (and updated mid-year as needed), each month, each week, etc.

Finding #6: The production record template currently does not meet all of the production record requirements and production records are not being filled in completely. During the week of review, the leftovers column was not filled in at all and the planned quantity was not completed for some items.

Corrective Action Needed: Submit one-week of lunch production records using an updated production record template that have been filled in completely.

Finding #7: Pre-K students were not offered a variety of milk. Rather, the teacher selected the 1% white milk for them without giving them a choice.

Corrective Action Needed: After conversation with the staff on-site, it was determined that pre-k students had previously been allowed to select between fat-free chocolate or 1% white milk. However, after a pre-review call in which pre-k/CACFP meal pattern was discussed, they stopped allowing students to select chocolate milk to comply with the CACFP requirement. As students were determined to be co-mingled during the on-site review, SFA staff agreed to go back to the previous practice of allowing pre-k students to have access to a variety of milk. **No further action is needed.**

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 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 also be subject to fiscal action. Thank you.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account Comments/Technical Assistance (TA)

- The consultant address financial topics with the Principal including how to locate the agency's Child Nutrition Program report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast.
- 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](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).

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; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance.
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund or the general fund until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
 - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
 - Under "Purchases Services" report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under "Ala Carte", report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from milks and adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account.

Allowable Costs

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found our Financial Management webpage (<https://dpi.wi.gov/school->

nutrition/national-school-lunch-program/financial).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs 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
- Thank you for preparing a policy and communicating it to your families annually and along with money collection procedures.

Paid Lunch Equity (PLE)

Comments/Technical Assistance (TA)

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Great job running this tool! The SFA’s current weighted average for 2017-18 SY tool is \$2.86.
- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the [PLE ‘In a Nutshell’](#) for more information on the PLE tool.
- Refer to the most recent [memo](#) from DPI.
- Refer to the most recent [guidance memo](#) from USDA.
- Step-by-step instructions to completing the PLE tool can be found on our [financial website](#) under Paid Lunch Equity.

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)

- Nonprogram foods include Adult Meals and Extra Milk (for cold lunch or extra milks at lunch).
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

- Adult meals are considered non-program foods. Thank you for pricing adult meals with the value of reimbursements and USDA Foods value.
- 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>).
- Districts 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 (2017-18 SY) should be used to determine adult prices.

Resources

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

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance (TA)

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 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. Thank you for using the correct statement on menus and letters to households.

And Justice for All Poster

- The new green "And Justice for All" poster is posted in public view where the program is offered.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by school nutrition staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype](#)

[Medical Statement](#) 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>)

- 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 may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. 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>).

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Local Wellness Policy (LWP)

Comments/Technical Assistance (TA)

- 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 2016-17 with full compliance 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 the SFA complies with the policy.
- An assessment of the policy every three years must be conducted to determine compliance with the wellness policy, how the wellness policy compares to model policies, and the SFA's progress 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.

- Good Shepherd Lutheran School recently presented a revised Local Wellness Policy to the school board. The public was informed of the meeting and the minutes are posted.

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Local Wellness Policy (LWP)

- **Finding #8:** This SFA's LWP meets some but not all requirements as stipulated above and outlined below in points 1 - 7. These are the sections that need to be addressed in the next Local Wellness Policy update.

1. SFA is required to make the LWP available to the public: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform the public about the content, implementation of, and updates to the LWP annually, as well as after the triennial assessment. SFAs may use a variety of methods to notify the public about the LWP and its updates. This may include mailing flyers, newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification.

2. SFA is required to have a committee of diverse stakeholders and/or a roster of those involved: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. SFA wellness committees should include a diverse team of committed school and community stakeholders. SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.

3. SFA is required to complete an assessment of the LWP: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the 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>). 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 school's report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (<https://www.wihealthatlas.org/lwp/>).

4. SFAs must include at least one goal for Nutrition Promotion and consider evidence-based strategies in determining the nutrition promotion goal, such as using Smarter Lunchroom techniques.
5. SFAs are required to adhere to meal regulations and include language related to this in the written local wellness policy. You may include language such as this: “All meals must meet or exceed current nutrition requirements established under the Healthy Hunger-Free Kids Act of 2010”.
6. The LWP must reference foods and beverages sold outside of the school meal programs. Those foods and beverages must meet the USDA’s nutrition standards for all foods sold in schools (Smart Snacks in schools rule).
7. SFAs must only market products that adhere to or are more strict than Smart Snacks guidelines during the school day and include language related to this in the written LWP.

Corrective Action Required: Please provide a timeline for updating your policy to include the above points 1-7 to become compliant with the final LWP rule.

Smart Snacks in Schools

Comments/Technical Assistance (TA) from Public Health Nutritionist

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.

The Wisconsin Department of Public Instruction 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 this may not occur in the meal service area during meal service times.

There is no required template that must be used to track fundraisers or products sold that are subject to Smart Snacks standards. However, tracking tool templates are available on the [Smart Snacks page](#) of our website and may be helpful in tracking this information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Findings and Corrective Action Needed: Smart Snacks in Schools

Finding #9: A vending machine located in the cafeteria is on during school hours and contains beverages that are not compliant with Smart Snack Regulations. While school staff indicated that students are not allowed to purchase from the vending machine during the school day, additional action must be taken to ensure that is the case.

Note: USDA defines “school day” as: the period from the midnight before to 30 minutes after the end of the instructional school day.

Corrective Action Needed: Submit a statement detailing how Good Shepherd Lutheran School will ensure that students do not have access to non-compliant beverages during the school day. As discussed on-site, options for compliance could include posting signage or turning off the machine during the school day. If signage is posted, please also submit a photo of the machine with the signage.

Professional Standards

Comments/Technical Assistance (TA)

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>). Thank you for tracking your trainings on an annual basis; the trainings for this school year is in progress.
- **Annual Training Requirements for All Staff**
Directors: 12 hours
Other Staff (20 hours or more per week): 6 hours
Part Time Staff (under 20 hours per week): 4 hours
If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Water

Comments/Technical Assistance (TA)

- Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Food Safety and Storage

Comments/Technical Assistance (TA)

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.
- (TA) Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Thank you for completing this daily.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service staff that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The site-specific food safety plan at Good Shepherd is called a Hazard Analysis Critical Control Point (HACCP) plan with a process approach to food safety is used and includes SOPs utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Food Employee Reporting Agreements

- (TA) All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).

Findings and Corrective Action: Food Safety

- Finding #10:** Missing Food Employee Reporting Agreements for all staff who work in the school nutrition area.

Corrective Action Needed: Complete all missing agreements. Submit a main copy of staff members who completed agreements as an attachment to assigned DPI Nutrition Program Consultant via email.

- **Finding #11:** 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. Submit photo as an attachment to assigned DPI Nutrition Program Consultant via email that shows where the inspection report is posted.

- **Finding #12:** Schools opting to reuse milk when out of mechanical refrigeration, must follow a Standard Operating Procedure. You may consult the local sanitarian for process approval. This [resource](#) indicates procedures for using an insulated milk bag with frozen inserts (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-bag-temperature.docx>).

Corrective Action Needed: Submit a timeline for a plan to offer milk to students kept outside of mechanical refrigeration.

Buy American

Comments/Technical Assistance (TA)

- 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.
- (TA) 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 be 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 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.
- 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 the product received and the 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/buy-american/monitoring>) are found on the procurement webpage under Buy American.
- 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.

- It is expected that the following products will require an exception to Buy American provisions: pineapple, mandarin oranges, olives, tuna, bananas and coffee.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Reporting and Recordkeeping

Comments/Technical Assistance (TA)

- 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.

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

Comments/Technical Assistance (TA)

Summer Meals

(TA) 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 Good Shepherd Lutheran School, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. This SFA may work in cooperation with Watertown Unified School District to inform families of summer meals or check the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

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 student success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage (dpi.wi.gov/statesupt/agenda-2017).



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