

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

School Food Authority: St. Mary's School

Agency Code: 31-7654

School(s) Reviewed: St. Mary's School

Review Date(s): February 18-19, 2019

Date of Exit Conference: 2/19/19

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

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. 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).

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. Everyone was very friendly, helpful, and 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.

Thank you to the Food Service Director for staying after hours to make sure everything was taken care of for the review. The DPI review team appreciates the eagerness of the Food Service Director and the Principal for their willingness to make changes to meet School Nutrition Program regulations.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The total number of eligibility determinations reviewed was 6. Of those determinations, there were zero errors.

Start Date of Eligibility

- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official via Free and Reduced School Meals Application or Direct Certification.
- The start date of eligibility is always the date the application is approved by the Determining Official the date Direct Certification was run.

Carryover

Carryover of meal benefits from the prior school year is allowable until the 30th operating day in the school year unless a Free and Reduced Meal Application has been submitted (approved or denied) or the student was coded on Direct Certification for any code except an N code. In those cases, carryover stops when a new meal determination has been made.

Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available.
- SFAs must annually distribute the Public Release to three of the following places:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need such as laundromats, social service agencies, libraries, grocery stores, WIC offices, food pantries, senior centers, physician offices/clinics, Community Action Program Agencies)
 - 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. You may request the public release to be published as a public service.

Direct Certification

- As a reminder, you are required to run direct certification with the full enrollment for the district a minimum of four times a year: at or near the beginning of the school year, three months after the initial run, six months after the initial run, and in March.
- A best practice is to run Direct Certification monthly and when a new student transfers in.
- Direct Certification (DC) was run on 8/14/18, 9/24/18, and 1/17/19.
- The effective eligibility date for a DC eligible student is the date of the original output file of the day that Direct Certification was completed.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).
- The household can “self-disclose” by bringing in a copy of their free/reduced approval notice or direct certification approval letter to the designated official operating the outside program. This option removes food service from these types of requests and is preferred. DPI recommends limiting the number of staff members responsible for collecting this data (e.g., one school secretary who has been trained on confidentiality, rather than each athletic coach).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- Finding #1:** The Benefit Issuance list at incorrect start dates of eligibility for every student certified for free or reduced-price meals. The school had correct documentation to support the statuses on file, but the start dates were in correct.

Corrective Action Needed: Update the start dates of eligibility in the software system to be the correct dates for the 18-19 SY. **Submit at statement of how you will make sure the correct start dates are entered into the software moving forward.**

Verification

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- There were no applications submitted during the 18-19 SY, therefore Verification was not required.
- For more information about Verification, please review the [Verification webinar](#) (https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html).
- The Verification Collection Report (VCR) was completed incorrectly. Please review the [instructions](#) on how to complete the VCR (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/verification-report-instructions.pdf>).

Meal Counting and Claiming

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- No errors were found on the monthly claim for reimbursement for the NSLP.

Visiting Students

- School age students visiting for lunch, may take a reimbursable meal, be charged the student lunch price, and be claimed in the paid category. Keep documentation to support they took a reimbursable meal.
- If you prefer to charge the visiting student for the meal and not claim them, they do not have to take a reimbursable meal, but must be charged the adult meal price or at least charged enough to cover all costs for their items.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff at St. Mary's School for their warm welcome and cooperation throughout the administrative review. Thank you, also, for all your questions, willingness to learn and quickly implement recommendations and required changes. It's been a pleasure working with your staff.

Comments/Technical Assistance/Compliance Reminders

Production records

Production records are intended to be useful tools to record information prior, during, and following production. They are also the SFA's way of proving that reimbursable meals were served; therefore, all items offered as part of the reimbursable meal must be recorded. This includes when products are substituted.

In addition, ensure that production records list the meal pattern that is being followed. There is no overlapping 3K-6 meal pattern. Because the preK students are comingled with the older students, the USDA flexibility may be observed to serve just one meal pattern for ease of service. Therefore, the K-8 meal pattern may be followed for all age/grade groups. This must be clearly identified on the production records.

In addition, the production record template currently in use does not contain space to record all required information including, menu type, USDA meal pattern used, site name, and total number of purchase units prepared. While there is no required production record template, there are some examples that may be used on our [Production Records](#) webpage. A copy of the production record requirements ("[Must Haves and Nice to Haves](#)" list) can also be found at that link (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Crediting Documentation

SFAs are required to document how foods offered credit towards weekly meal pattern requirements. Any processed product that is not listed in the USDA *Food Buying Guide* for Child Nutrition Programs (potato smiles) requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to credit toward the meal pattern. 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). If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for Child Nutrition Programs, it may not be credited when served as part of the USDA School Meal Programs. Additionally,

remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

Standardized recipes

Use of standardized recipes is another important part of USDA School Meals Programs. Any menu item that has more than one ingredient must have a standardized recipe. These recipes have been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used.

Visit our [Standardized Recipes](https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) webpage for resources regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. (<https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>).

Please review, update and/or add the following information to your recipes:

- Hamburger patty with beef base
 - Portion size: 1 hamburger patty
 - Amount listed in weight column for hamburger patty should be the weight or measure of 70 patties because recipe is written for a yield of 70 patties.
- Sub sandwiches
 - Portion size: 1 sub sandwich
 - Review and update crediting

PreK Students

The preK students at St. Mary's School are considered comingled and therefore all age/grade groups are following the K-8 meal pattern. This is acceptable under comingling flexibility from the USDA.

Field Trip Lunches

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way to collect meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

School breakfast

Consider participating in the School Breakfast Program (SBP). Participation in SBP will enable the SFA to help students start their school day with good nutrition and provide reimbursement to you for doing so. More information is available on the [School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program) webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding #1: Incomplete production records.

Corrective Action Needed: Submit one week of completed production records including all pieces of required information including, menu type, USDA meal pattern used, site name, and total number of purchase units prepared. Refer to production record requirements (“[Must Haves and Nice to Haves](#)” list) to ensure all required pieces of information are included (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>).

❑ **Finding #2:** Standardized recipes need to be updated.

- Hamburger patty with beef base
 - Portion size: 1 hamburger patty
 - Amount listed in weight column for hamburger patty should be the weight or measure of 70 patties because recipe is written for a yield of 70 patties.
- Sub sandwiches
 - Portion size: 1 sub sandwich
 - Review and update crediting

Corrective Action Needed: Update the abovementioned recipes and submit for review.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

3. RESOURCE MANAGEMENT

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

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 which is highly recommended. The [Annual Financial Report instructions](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- Any milk served to students for milk break must be recorded as a Nonprogram Food revenue on the Annual Financial Report. Additionally, the labor, food costs, and any other costs incurred for the milk must be recorded as expenditures under Nonprogram Foods.
- 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 “Purchased Services” report any time you pay someone for services provides such as equipment repair and health inspections.

- Under “nonprogram foods”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
- 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. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods.

Allowable Costs

- Bad debt from unpaid student lunch accounts 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

- The SFA does not have any issues with unpaid meals at this time.
- 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 snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). 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>)
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](#) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals and Extra Milk (for cold lunch or the milk break).
- If students would like to take extra fruit and vegetables, you do not need to charge them for these. However, if you see an excessive amount of these items being taken, you could potentially be losing money and should charge for extras.
- Giving away food without charging for it is unallowable.
- If you want to allow the students to take extra entrées, or any extra sides, they must be charged. You can calculate the raw food cost for these items and plug them into the [DPI Nonprogram Food Price Calculator Tool](#) to determine what you should price them out as (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>). The [Menu Raw Food Costing Tool](#) can be used to price out a week’s worth of entrées to get the raw food cost (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw->

food-costing-tool.xls). Plug the average raw food cost from this tool into the DPI Nonprogram Food Price Calculator Tool.

- 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.
- The USDA Nonprogram Revenue Tool (the formula shown below) must be completed annually, at a minimum, to ensure all costs of Nonprogram foods are being covered.

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

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, at a minimum, SFAs must follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- SFAs need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates 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>)

Indirect Costs

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

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

- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district’s total.

Findings and Corrective Action Needed: Resource Management

- ❑ **Finding #1:** Rent is charged to the Nonprofit School Food Service Account for \$100 per month. This is unallowable. In order to charge rent for using the kitchen, a realtor must assess the kitchen and determine how much you may charge for rent. Otherwise, you must discontinue paying rent for the kitchen out of the Nonprofit School Food Service Account.

Corrective Action Needed: Submit a statement to the consultant for what the plan moving forward is.

- ❑ **Finding #2:** Nonprogram foods (Adult meals, Extra milk, and Milk break milk) are not being tracked or recorded on the Annual Financial Report.

Corrective Action Needed: For the 18-19 SY Annual Financial Report, report all of the revenues and expenditures for the nonprogram foods in the nonprogram foods section of the report. **Submit a statement of how you plan to track and record all nonprogram foods revenues and expenditures for the Annual Financial Report.**

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The And Justice For All poster was posted in a publicly visible location at the review site.

Special Dietary Needs

- If accommodating students with allergies by having a specific table to sit at, it is advised to not label it “peanut free” or “allergen free”. Instead, label it “allergen aware” or “peanut aware” as you may not be able to guarantee the table(s) are free from any allergens at all times of the day. The school should have special procedures for 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.

Local Wellness Policy

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 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.

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

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

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

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

- Finding #1:** The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>). **Provide a statement of when you plan to have the policy updated and compliant with the final rule.** The [Wellness Policy Builder](https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy (<https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1>).

Smart Snacks in Schools

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at St. Mary's School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Buy American

Comments/Technical Assistance/Compliance Reminders

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product. A "Domestic Commodity or Product" is defined as an agricultural commodity or product that is produced or processed in the United States using substantial agricultural commodities that are produced in the United States (products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States).

"Substantial" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs.

If no country of origin is identified on the label, the 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 in an email. Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

The following information must be recorded on a Buy American Non-Compliant Product List. *Note:* In reference the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

When completing the [Buy American Non-Compliant Product list](#) there are 4 pieces of information that must be recorded:

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

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#)

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>;
<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American Provision

❑ **Finding #1:** The following products are non-domestic or no country of origin was listed on the packaging. Complete a non-compliant product sheet or request additional information from the vender to determine product origin.

- Chopped dehydrated onions - Distributed by...
- Canned pineapple - Thailand
- Dei Fratelli Condensed tomato soup - Packed by...

Corrective Action Needed: Complete non-compliant product sheets for each of the aforementioned products, and include any additional information from the vendor, if applicable. Submit to the public health nutritionist for review.

Professional Standards

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Professional Standards: New Food Service Director Hiring Requirements

- The [hiring standards for SFA directors](#) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

- Continue to use the [DPI tracking tool](#) to track trainings (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>).
- 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](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- USDA allows a flexibility to complete the total training

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours

- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Food Safety and Storage

Commendations

- The Food Safety Manual was available for review and had all required information. The temperature logs were documented well and organized nicely.
- Food Safety Inspections were posted in the cafeteria for all to see.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** There is no SOP on file for Field Trips.

Corrective Action Needed: Print off a copy of the [Field Trip SOP](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx). Edit it to be site specific. **Submit a statement this has been added to the Food Safety Manual.**

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- Be sure to keep all documents pertaining to the School Nutrition Programs for 3 years plus the current school year. You may shred anything from the 14-15 SY and prior.

Summer Food Service Program (SFSP) Outreach

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

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 this location, 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](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

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (https://dpi.wi.gov/statesupt/every-child-graduate).”



With School Nutrition Programs!