

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

School Food Authority: St. Mary's School

Agency Code: 35-7712

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

Review Date(s): 1/16-17/19

Date of Exit Conference: 1/17/19

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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, and 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. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** From the student sample reviewed for benefit's issuance, one student had been determined as free via income application but was changed to reduced after direct certification run in December. The family needs to receive the best benefit determined, so the free benefit should have stayed free.

Corrective Action Needed: Please notify this household of the increase in benefits (to take effect no later than 3 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be assessed for these errors for the review period (December) and month of on-site review (January), but USDA allows a \$600.00 per program disregard before fiscal reclaim is necessary.

- ❑ **Finding #1:** Benefit issuance determination letters are sent home with students in a sealed envelope. All benefit recipients need to be notified of benefit issuance via trackable email address delivery or mailed notification to assure proper notification.

Corrective Action Needed: Please submit a statement of understanding that benefit issuance will be mailed or emailed to households.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable, but these verifications are not considered part of the Verification sample. For more information, refer to the current [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).
- 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.

Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** Section 3 of the Verification Collection Report states 9 students are certified through other programs which includes the Medicaid reduced certified students, and reduced Medicaid certifications are not included in this section.

Corrective Action Needed: Please resubmit the VCR with reduced Medicaid students removed from Section 3. Completed on site. No further action required.

- ❑ **Finding #2:** The verified application was determined eligible via net income and gross income is used for benefit issuance. The benefit did not change.

Corrective Action Needed: Please provide a statement of understanding that income benefit determinations will be made from gross income.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- When reporting the number of students approved free or reduced on the claim, this number is the highest number approved eligible for the month being claimed.

- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission, and each site listed on Schedule A of your on-line contract must have its own edit check to view before claim consolidation.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** The number approved free or approved reduced was incorrectly reported on the December claim.
Corrective Action Needed: Please submit a statement that highest number of students eligible for free or reduced benefits during the claiming month will be recorded on the claim "Student Approved Free and Student Approved Reduced."
- ❑ **Finding #2:** The students write their own name on a blank sheet of paper for the breakfast counting process, and an adult needs to be responsible for all counting and claiming procedures.
Corrective Action Needed: Please correct the process and submit 30 days of clean counts to complete fiscal recalculation for the lunch meals served for the months of September, October, November, and December. There is a \$600.00 disregard before fiscal reclaim is necessary.
- ❑ **Finding #3:** Students are checked-off in the software system in the classroom prior to lunch service and this constitutes an inaccurate point of service because if the student were to become ill, they would need to be removed from the list. The USDA refers to this a back-out system and it is not an acceptable point of service.
Corrective Action Needed: Please correct the process and submit 30 days of clean counts to complete fiscal recalculation for the lunch meals served for the months of September, October, November, and December. There is a \$600.00 disregard before fiscal reclaim is necessary.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations: Meal Pattern

Thank you to all staff at St. Mary's School for the warm welcome and cooperation during this Administrative Review (AR). All staff were friendly, easy to work with, and receptive to feedback and suggestions. The Food Service Director is new to her position and is doing a great job menu planning and serving healthy meals to students. They are already making positive strides such as switching from 4% cottage cheese to a lower fat version and switching from iceberg lettuce to a Spring Mix, which is more nutrient dense. There were no non-reimbursable breakfasts or lunch during the day of onsite. This shows staff have a great understanding of Offer versus Serve (OVS) and the meal pattern. The kitchen and cafeteria were very clean and the food was fresh and tasteful. Great job serving delicious meals to the students of St. Mary's!

Technical Assistance and Program Requirement Reminders: Meal Pattern

Production Records

Production records are useful tools to record information prior to production, during production, and following production. The current production record template has missing information, such as serving site, total planned number of meals, planned serving size for many items and actual usage for condiments. Planned/actual quantity prepared in purchase units (e.g. #10 can, 2 cases) should also be recorded daily. Any food offered as part of a reimbursable meal must be recorded on production records. This includes condiments and the salad bar. Milk usage by type should also be recorded and on separate lines.

Be specific about the identity, brand, and description of the items served. Instead of “cereal,” specify exactly which kind. Instead of “Juice,” specify which flavor. There is a wide variation in many products and being specific about the product helps reduce confusion among staff and ensures the menu, as it was intended, is served to students. Fruit sizes (e.g. case count) should also be recorded. Instead of “apples,” include the case count as different sizes credit differently.

While there is no required production record template, there are some examples that may be used on DPI’s [Production Records](#) webpage. 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>).

Menu Planning

As a menu planner, you choose how you want your menu to look. Develop your own recipes and introduce new foods, just as long as the breakfast and lunch meal patterns are met. The following resources will assist you in planning your menus:

- [Lunch Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>)
- [Breakfast meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf>)
- [Lunch Menu Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-5.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-5.doc>)
- [Breakfast Menu Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx>)

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g., chicken patty on a bun, salt with rice). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. When taking a recipe from another source, make sure to re-standardize and re-write any changes in your operation. Old recipes with differing amounts written in the margins must be re-written and re-standardized to your operation as the yield has likely changed and the crediting can no longer be validated.

Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). Use the [USDA Standardized Recipes webpage](#) for recipe ideas (<https://www.fns.usda.gov/usda-standardized-recipe>).

Extras

Currently, the salad bar at lunch and the peanut butter at breakfast and lunch are offered as extras. Consider designing your menu so that these foods are included in the meal pattern. For example, 2 TBSP of peanut butter credits 1.0 ounce equivalent (oz eq) meat/meat alternate (M/MA). This amount is being portioned out for students to select as an extra and not as a M/MA. If you contribute this to the meal pattern, they could select this peanut butter as their M/MA option. The salad bar also has many vegetables and sometimes other M/MA products (cheese, hard-boiled eggs, cottage cheese). All of these products contribute toward the dietary specifications for the week (calories, saturated fat, sodium, trans fat) and *could* contribute to the M/MA or vegetable components if planned that way.

Child and Adult Care Food Program (CACFP) CACFP, Co-mingling flexibility - misuse

Preschool students are allowed to be served the K-5, K-8, or K-12 breakfast or lunch menu *if* they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA. Children who are not yet in kindergarten must be served the updated CACFP meal pattern if not co-mingled with other age/grade groups at meals. During on-site observation, preschool students were co-mingled at breakfast, but not at lunch. At lunch, there was a clear gap between 3-, 4-, and PK students from the rest of the school. The students who are not yet in kindergarten must be served the CACFP meal pattern.

CACFP, Sugar in Yogurt

The CACFP meal pattern requires yogurt to contain no more than 23 grams of total sugars per 6 ounces. This requirement will help reduce children's consumption of added sugars. To determine if a yogurt meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams or ounces) found on the nutrition facts panel. The answer must be less than the 0.135 threshold for sugar in yogurt if using a serving size in grams and 3.83 if using a serving size in ounces. Alternatively, a sugar limit chart for yogurt may be used to determine if yogurt meets the sugar requirements.

CACFP, Grain-based Desserts

Grain-based desserts are not creditable toward the grains component under the CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet piecrusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. There was a Chocolate, Whole grain-rich Rice Krispies bar served to those not yet in kindergarten during the day of review. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

CACFP, Milk types

Only unflavored milk is allowable under the CACFP meal pattern. Flavored milk may not be served. Children 2-5 years old and not yet in kindergarten should be served **unflavored** low-fat (1%) or unflavored fat-free (skim) milk. Discontinue serving skim chocolate milk to those not yet in kindergarten. The Smarter Lunchrooms Movement has strategies to [encourage the consumption of unflavored milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

CACFP, Offer Versus Serve (OVS)

Offer Versus Serve (OVS) is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service.

More information on CACFP topics can be found on SNT's [Infant and Preschool in NSLP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

For questions about the updated CACFP meal pattern, please contact our specialists: Tanya Kirtz at Tanya.Kirtz@dpi.wi.gov or Erin Opgenorth at Erin.Opgenorth@dpi.wi.gov.

Crediting

Meat/meat alternates and grain products credit by oz eq and fruits and vegetables credit by volume (cups, tbsp, etc.). Visit the [Crediting in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf) for an overview of crediting in the NSLP and SBP (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf>).

Food Buying Guide (FBG)

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

Crediting Documentation

Processed foods that are not listed in the *USDA Food Buying Guide for Child Nutrition Programs* must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. 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 (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

The following links contain helpful electronic crediting documentation for the products currently on the menu:

- [USDA Product Information Sheets](https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) (<https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets>)
- [WI Processed Product Nutrition Information](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf>)
- [General Mills PFS](https://www.generalmillscf.com/industries/k12/support-tool-categories/exploring-products/grain-guide-letter) (<https://www.generalmillscf.com/industries/k12/support-tool-categories/exploring-products/grain-guide-letter>)

Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

Equipment Grant

The USDA distributes funding annually to State Agencies (SAs) to award equipment assistance grants to eligible School Food Authority’s (SFAs) participating in the NSLP. Priority for this grant is given to schools that have not received similar USDA equipment grants in the past and have 50% or higher free and reduced-price eligibility. More information can be found on the [NSLP Equipment Grant Opportunities](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) webpage (<https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant>).

Scoop Sizes

For a visual display, download the Institute of Child Nutrition [Basics at a Glance](https://theicn.org/icn-resources-a-z/basics-at-a-glance/) poster, which includes scoop sizes, fraction to decimal equivalents, and steam table pan capacities (<https://theicn.org/icn-resources-a-z/basics-at-a-glance/>).

School Nutrition Team News

To join the SNT email Listserv, go to the [School Nutrition Programs homepage](https://dpi.wi.gov/school-nutrition) (<https://dpi.wi.gov/school-nutrition>). Scroll down and click on the Join our ListServ blue button in the

bottom left screen. You will receive bi-weekly emails on the second and fourth Tuesdays of the month with the latest school nutrition news.

Corrective Action: Meal Pattern

- ❑ **Finding #1:** Production Records do not have all required information and are not filled out entirely on a consistent basis. Serving site and planned number of meals were not included on production records, which are required. The quantity prepared and some serving sizes were not consistently filled out. There were also no salad bar production records for the week of review.

Corrective Action Required: Submit one week of production records for both breakfast and lunch (including salad bar) with all required information and all information filled out.

Production record templates for both breakfast and lunch (filled out) were sent to the Food Service Director as a reference. Templates (including salad bar templates) and [Production Records Must Haves](#) can also be found on DPI's [production records webpage](#) and edited to meet the needs of the school (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>)(<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

- ❑ **Finding #2:** The following recipes were not standardized to St. Mary's operation and did not follow the instructions and products exactly:

- Nacho Meat (recipe states enriched tortilla chips; whole grain-rich chips used in practice)
- Sloppy Joe (recipe states enriched bun; whole grain-rich bun used in practice)
- Stromboli (full recipe not provided; recipe also uses outdated grain crediting of grains/breads using the 14.75 g creditable grain per oz eq; updated versions use 16 g creditable grain per oz eq)

Corrective Action Required: Submit recipes that are standardized to St. Mary's operation (i.e. exact products, instructions, and amounts used). Use DPI's recipe templates, found on the [Standardized Recipe webpage](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

- ❑ **Finding #3:** No dark green vegetables were offered at lunch during the week of review. For the K-5 meal pattern, ½ cup dark green vegetable must be offered over the course of the week. Examples from this subgroup can be found on the Connecticut Department of Education's [Vegetable Chart](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>).

Corrective Action Required: Submit a statement explaining what you will do to the week of review so that ½ cup of dark green vegetable will be offered over the course of the week at lunch. Include the type of vegetable, serving size(s), and on which day(s) this will be offered.

- ❑ **Finding #4:** The following documentation was not provided:

- Waffle
- Cheese stick
- Muffin (box provided; need recipe if preparing from box)
- Cherry Strudel
- Breakfast Pizza
- Bagel (served day of onsite)

Corrective Action Required: Submit documentation (e.g. nutrition facts labels, Product Formulation Statements and/or Child Nutrition (CN) labels, etc.) for the products listed above.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed.

Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) and webcast are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf> and <https://dpi.wi.gov/school-nutrition/training/webcasts#afr>).
- 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 (Fund 50) or the general fund (Fund 10) 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” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, you should be reporting 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 would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to 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. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

- Alternate meals for students without funds to pay, that are provided free of charge, must have the entire meal cost funded from a non-federal source and are subject to nonprogram foods revenue regulation as food service may not absorb the meal cost.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, no expenses or revenues are allocated to nonprogram foods and the schools sells adult meals and extra milk, and a portion of food, labor, purchased services, and other must be allocated to nonprogram foods.

Corrective Action Needed: Please provide a statement that going forward all revenues and expenses will be broken out by program and category.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs 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 and non-federal funds must be transferred into the food service fund to cover the deficit.
- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to reassess 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 prices.
- **All milks sold to students for cold lunch milk must be charged full price as this is a nonprogram food and only complete reimbursable meals may be provided free of charge to free students.**

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** Adult meals are provided free of charge to the teachers require a transfer from the general fund to cover the full adult price of these meals.

Corrective Action Needed: Please submit a tracking tool and ledger entry to show that adult meals provided free to school staff are paid back to food service via nonfederal funds.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Processes for complaints

- All SFAs should have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. 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).
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

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>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** Meal substitutions are being made to the meal pattern without substitute requirements listed on the signed medical statement.
Corrective Action Needed: Please submit copies of the signed medical statements that require meal pattern substitutions with student names blacked out, please. Wellness Policy also needs to be updated to include a the requirement of a signed medical statement to make meal pattern substitutions.

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

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

Smart Snacks in Schools

- 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 unless the sales qualify for an exemption. You can find more information 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>).
- 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 sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

There are no fundraisers or a la carte items sold at St. Mary's School.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

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, 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>).
- **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

Findings and Corrective Action: Professional Standards

- ❑ **Finding #1:** Training is not being monitored on a tracking tool.
Corrective Action Needed: Include all current training hours for each food service employee onto the DPI tracking tool (<http://dpi.wi.gov/school-nutrition/training/professional-standards>) and submit as corrective action.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety

- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.

Time/Temperature Control for Safety (TCS) Food

- Milk and dairy products
- Shell eggs
- Meat (beef, pork, and lamb)
- Poultry
- Fish
- Shellfish and crustaceans
- Baked potatoes
- Heat-treated plant food, such as cooked rice, beans, and vegetables
- Tofu or other soy protein
- Sprouts and seed sprouts
- Sliced melons
- Cut tomatoes
- Cut leafy greens
- Untreated garlic-and-oil mixtures
- Synthetic ingredients, such as textured soy protein in meat alternatives

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration or heat during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Because cold items are held outside of mechanical refrigeration on the salad bar, Time as a Public Health Control must be used.
Corrective Action Needed: Please develop a Time as a Public Health Control SOP and submit updated SOPs as attachment via email.

Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation. SFAs must monitor contractor performance, to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- In USDA Memo SP 38 -2017, any product that does not identify the country of origin requires certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products.
- *Achieving Buy American Compliance*
 - 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 percent 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.

- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (<https://dpi.wi.gov/school-nutrition/procurement/procurement-manual>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

There were no Buy American findings at St. Mary's School.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at the school district, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [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>)
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

Findings and Corrective Action: SBP and SFSP Outreach

- ❑ **Finding #1:** Summer food service outreach was not provided to students.
Corrective Action Needed: Please provide a statement that you will notify students of the ability to receive free summer meals.

Wisconsin School Day Milk Program

Technical Assistance

- The Wisconsin School Day Milk Program (WSDMP) was created by the Wisconsin Legislature to reimburse schools for a portion of their costs for serving milk at a milk break to Pre-Kindergarten through Grade 5 students who are eligible for free or reduced price meals. Only one half-pint of milk may be claimed per eligible student per school day. By State law, no charge can be made to those students who qualify for free and reduced price meals and are receiving free milk under the WSDMP. Milk served to paid students at the milk break in Grades PreK through 5, and students in Grades 6-12, is not eligible for reimbursement and these non-reimbursable milks are considered non-program foods.
- Schools who wish to participate in the WSDMP must complete the [Application Agreement/Policy Statement \(PI-1464\)](https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf) and submit it to the DPI office by mail, fax or email (<https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf>).

Carolyn Stanford Taylor, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. Her 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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).

