USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Trinity Lutheran Agency Code: 357955

School(s) Reviewed: Trinity Lutheran

Review Date(s): November 27-28, 2018 Date of Exit Conference: 11/27/2018

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 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 <u>School Nutrition Training</u> webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their <u>Healthier School Day: The School Day Just Got Healthier</u> webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- The Smarter Lunchrooms Movement encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options
 (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Trinity Lutheran School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

Verification

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

When a benefit eligibility status increases, the change must take place within three days. When a benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Verification

Finding: The finding was that the application chosen for verification was not verified correctly. The net amount was used for determining income not the gross amount. Due to the error, it was found that the household does not qualify for a meal benefit.

Corrective Action Needed: Please send a letter to the household regarding the change in meal status. Please update the benefit issuance list and the point of service after the 10-calendar day requirement.

Meal Counting and Claiming

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

The meal counting and claim for the review month of October was conducted perfectly.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Sincere thanks to the Food Service Director and school nutrition professionals of Trinity Lutheran School. We appreciate your time and efforts spent preparing for and participating in the onsite review. The Food Service Director's menu item notes on production records are meticulous. She was receptive to feedback, both positive and constructive criticism. She asked questions reflective of her knowledge as well as her desire to improve the School Meals Program. The Food Service Director and Authorized Representative are considering implementation of Offer Versus Serve (OVS) for students in grades kindergarten through 8 in the upcoming school year 2019-20, which is commendable.

<u>Technical Assistance and Program Requirement Reminders</u> Grain-based Desserts

No more than 2.0 ounce equivalents (oz eq) of grain-based desserts can be offered per week at lunch. Grain-based desserts are designated with a superscript 3 or 4 on Exhibit A

(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf). They must be whole grain-rich to credit towards the grain component. If a grain-based dessert is not whole grain-rich (made with more than 50 percent enriched grains), then it cannot credit towards the grain component. However, grain-based desserts count towards the weekly grain-based dessert limit regardless of whether or not they are whole grain-rich (e.g. brownies made with enriched flour cannot credit towards the grain component, but they counts towards the grain-based dessert limit for the week in which they are served).

Sodium

Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, and processed food items, like chili and cheese sauce. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years.

Extra Items and Planned Portion Sizes

Extra items, both creditable and non-creditable (e.g. brownies, fortune cookies, pudding, romaine lettuce, cheese, croutons, orange juice, and various fruits and vegetables [i.e. salad bar optional]), are offered on the menu. Several of these foods could credit towards daily and weekly meal pattern requirements but currently do not. For example, the meal planner could plan fruits and vegetables on the salad bar to credit towards the meal pattern, when served a minimum of 1/8 cup, prior to the point of service (POS). While offering extra items occasionally is allowable and can be an incentive for program participation, staying within the dietary specifications for calories, sodium, saturated fat, and trans fat can be very difficult when extras are served frequently. These foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal.

Planned portion sizes are required for every menu item, including condiments and extras. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Use volume measures (such as cups) to record portion sizes of fruits, vegetables, and milk, and use weight measures (such as ounces or grams) to record portion sizes of meat/meat alternates and grains.

USDA Food Buying Guide for Child Nutrition Programs

The <u>USDA Food Buying Guide for Child Nutrition Programs</u> contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on "food items search" and type in a specific food in the "keywords" search box. Many different options may appear. Find the entry 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.

A webinar presented by USDA Child Nutrition Programs Nutrition & Technical Assistance Branch showcased the new Food Buying Guide (FBG) Mobile App and FBG Interactive Web Tool via a demonstration. Learn how to utilize the innovative features of these tools including search and navigation, the ability to compare food yield information, and the ability to create a favorite foods list. Access the recorded webinar (https://youtu.be/UP_t3D7AYAM) on the Food and Nutrition Service website (https://www.fns.usda.gov/tn/food-buying-guide-goes-digital).

Most fruits and vegetables credit by volume served (e.g. ½ cup peaches, drained will credit ½ cup fruit) and the FBG will note if the crediting is different based on volume served (e.g. one medium banana credits ½ cup fruit). Reference the School Nutrition Team (SNT) Half-Cup Crediting of Fruits and Vegetables
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In-house Yield

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the School Food Authority's (SFA) next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yields from a product than what is specified in the FBG. Additionally, an in-house yield study may be used for food items or sizes that are not currently listed in the FBG. In-house Yield Study Procedures are available on the Menu Planning webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy).

Consider adding signage to the meal service line, like the SNT Salad Bar Signage, showing students how many pieces of fruits and/or vegetables to select based on the planned portion size(s) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).

Crediting Documentation

Processed foods that are not listed in the FBG must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. Secure a PFS directly from the manufacturer or save a CN label directly off the packaging.

State-Processed and USDA Foods Product Information Sheets

Product formulations change frequently, therefore it is important that nutrition facts labels, CN labels, USDA Foods Product Information Sheets (USDA Fact Sheets), and PFS on file are kept up-to-date. State-Processed Product Information is updated annually and can be found:

SY 2018-2019 State-Processed Product Nutrition Information

(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf) <u>USDA Foods Product Information Sheets</u> are organized by component and updated as needed (https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets). CN labels can be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed.

More information about crediting documentation can be found on the <u>NSLP Menu Planning webpage</u>, under the Child Nutrition Labels and Product Formulation Statements heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

Weekly Nutrient Calculator

Rather than the standardized recipe template, the Weekly Nutrient Calculator can be used to analyze calories, saturated fat, and sodium values weighted over the week. When analyzing nutrients, remember that the values must be weighted according to popularity (how the menu planner plans for each item to be selected). This tool can quickly show both high and low menu items, as well as high or low days on the menu, making it quick to determine which days could be mixed and matched throughout the month. Access this tool on the NSLP Menu Planning webpage, under Menu Planning Tools (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools).

Standardized Recipes

Recipes, such as spaghetti with meat sauce, should be updated to reflect current practices and products. Standardized recipes exist, but may not accurately reflect what is happening in the kitchen. Use the **exact** procedures, equipment, ingredients, and serving utensil to produce consistent quality and yield every time. This is critical for crediting school nutrition recipes, especially vegetable contributions to weekly subgroup requirements.

Vegetable Subgroups and Mixed Vegetables

The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students are getting a variety of nutrients each week, the USDA lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Refer to the Vegetable Subgroups handout (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) from the Menu Planning webpage to identify commonly eaten

vegetables in each subgroup.

Stir Fry Vegetable Blend contains vegetables from multiple subgroups (broccoli, carrots, pea pods, onions, red peppers, water chestnuts, mushrooms), including starchy. Therefore, it credits as additional vegetable. This still credits towards the daily minimum requirement for vegetables, but does not contribute to a specific vegetable subgroup.

Production Records

Production records are required to document that food meeting the meal pattern requirements was served in the appropriate portion sizes. Continue working with all staff members to record planned usage, actual usage (Actual # of Servings Prepared/Available, Actual Quantity prepared [in purchase units]), and leftovers for all menu items, including daily alternate entrees (e.g. ham sandwich), condiments, and extras. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. The production record requirements list ("Must Haves and Nice to Haves") was reviewed onsite (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). It may also be found on the Production Records webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

Available milk types and actual usage by type (or a milk recipe) must be recorded on production records. A variety of milk, at least two allowable milk types, is required to be offered daily at lunch and breakfast. Allowable milk types in Child Nutrition Programs include nonfat (skim) milk, flavored (e.g. chocolate, strawberry, etc.) or unflavored, and low-fat (1%) milk, flavored or unflavored. Milk types may also be lactose-reduced or lactose-free.

Offer Versus Serve (OVS)

OVS is not required for students in grades kindergarten through 8, although it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, each student must be served $\frac{3}{2}$ cup vegetable and 1 cup of milk as part of his or her reimbursable meal. If OVS is implemented, then students can choose three of the five components offered, including $\frac{1}{2}$ cup fruit, vegetable, or combination, to create reimbursable meals.

The Offer Versus Serve Guidance manual and the Offer Versus Serve webcast may be used as training resources (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf, https://dpi.wi.gov/school-nutrition/training/webcasts). Additionally, Meal or No Meal, a training resource created by the SNT, may be used for staff determining reimbursable meals (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx)

Field Trip Meals

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) foods, establishing a way to collect meal payments, and obtaining a count by eligibility category.

If your school implements OVS, it must be implemented to the extent possible during field trips 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 overview (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf).

Child and Adult Care Food Program (CACFP)

Meal Pattern

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

Allowable Milk Types

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

Offer Versus Serve (OVS)

OVS is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the updated 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 regarding the updated CACFP meal pattern is available on the <u>Infants and Preschool in NSLP and SBP</u> webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool). For questions, please contact our specialists: Tanya Kirtz at <u>Tanya.Kirtz@dpi.wi.gov</u> or Erin Opgenorth at <u>Erin.Opgenorth@dpi.wi.gov</u>.

School Breakfast Program

Trinity Lutheran School does not currently participate in the School Breakfast Program (SBP). Participation in the program is encouraged, as ensuring students have access to breakfast is beneficial for their health and academic success. Specifically, students who eat breakfast at school, closer to class and test-taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. Furthermore, providing students with breakfast in the classroom is associated with lower tardy rates and fewer disciplinary referrals. The Resources for the SBP webpage (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) contains a wealth of information about the different breakfast service and financial models. For questions on breakfast models or starting a program, contact the School Breakfast Program Specialists (DPISBP@dpi.wi.gov).

Training

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) SNT trainings. These are offered in the summer and select other times throughout the year. Courses provide overviews of all areas of the National School Lunch Program (NSLP) and SBP requirements including meal pattern, OVS, and CACFP. Travel and meals are allowable expenses to the nonprofit food service account. Information on upcoming trainings can be found on the Training webpage, under Upcoming Trainings (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics. These can be found on the SNT Webcasts webpage (https://dpi.wi.gov/school-nutrition/training/webcasts).

Findings and Corrective Action Needed:

Meal Pattern Finding #1: Daily and weekly minimum requirements for vegetables were not met for lunch during the review period due to 1/2 cup of vegetables offered on Thursday and Friday (October 25 and 26). On Thursday, insufficient amounts of baby carrots and celery sticks (i.e. 1/8 cup each) were planned and served. On Friday, students who selected the daily alternate entrée (e.g. ham and cheese sandwich) did not have access to 3/8 cup of marinara sauce, an ingredient of spaghetti with meat sauce. The daily minimum requirement is 3/4 cup, and the weekly minimum requirement is 3/4 cups. Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.

Required Corrective Action: Describe specifically how the daily and weekly minimum requirements for fruit will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address baby carrots and celery sticks in your reply.

Meal Pattern Finding #2: Submitted production records for lunch for the review period were incomplete. Daily alternate daily alternate entrée (e.g. ham and cheese sandwich) and available milk types and actual usage by type (or a milk recipe) were not recorded. All required information on the production record template must be documented for all menu items.

Required Corrective Action: Submit three full days of completed production records for lunch. Select production records you are confident are filled in accurately and completely.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

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.
- 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.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance".
- These categories of the AFR that should be addressed when tracking revenues and expenditures
 include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other".
 Only expenses for edible food items and beverages should be reported under "Food".
 - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
 - Under "Purchases Services" report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under "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. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

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.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. SP23-2017 Unpaid Meal Charges guidance Q & A may be found our Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the <u>Unpaid Meal Charges In a "Nutshell"</u> (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: <u>Unpaid Meal Charges Guidance</u> 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 <u>unclaimed property</u> that must be followed (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf).

Revenue from Non-program Foods

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

- Non-program 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 costs associated with non-program foods, including food, labor, equipment, and purchased services
 must be covered by revenues received from the sale of those foods. Non-program foods may not be
 supported by reimbursable meals or have a non-program foods loss absorbed by the food service
 account. Thus non-program foods may never run in the negative unless non-federal funds are
 transferred into the food service fund to cover the deficit.
- Non-program Food costs and revenues must be separated from Program food costs and revenues.
- Since non-program foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- The USDA Non-program Revenue Tool must be completed yearly, at a minimum. The <u>DPI Nonprogram Food Revenue Tool/Calculator</u> located on our website feeds into the USDA tool and aids in calculating prices of non-program foods and meeting the USDA non-program food regulation (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx).

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

• SFAs that sell <u>only</u> non-program milk and adult meals as non-program foods are <u>exempt</u> from completing the USDA Non-program Food Revenue tool.

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, SFAs must at a minimum, follow the <u>minimum</u> pricing guidelines in Food Nutrition Services Instruction 782-5.

A <u>Wisconsin Adult Meal Pricing Worksheet</u> 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).

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

Finding: The non-program food revenue tool is required due to daycare meals being sold. The Non-program Foods Revenue Tool has not been completed correctly for the current school year. Technical assistance was provided to food service director and secretary.

Corrective Action Needed: Please complete the non-program food revenue tool. The reviewer worked with SFA to complete the tool. No further action needed.

Indirect Costs

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

- 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).
 - o 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.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

Nondiscrimination Statement

When including the <u>non-discrimination statement</u> on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights). Technical assistance was provided to include the full statement in the handbook and on the website.

However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, "This institution is an equal opportunity provider." Either of these statements must be in the same size font as the other text in the document.

And Justice for All Poster

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

Civil Rights Training

Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

Civil Rights Self-Compliance Form

The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually.

Special Dietary Needs

All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the <u>prototype Medical Statement</u> 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 <u>special dietary needs</u> can be found on the DPI School Nutrition Team website (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). This <u>flow chart</u> gives guidance on special dietary needs, as well (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf)

School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on <u>fluid milk substitutes</u>, please see our Special Dietary Needs webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs).

Overt Identification

The meal counting system must prevent overt identification of students receiving free and reduced price benefits. Processes for complaints

All SFAs should have procedures (written procedures preferred) 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.

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 <u>USDA Program Discrimination Complaint Form</u> for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Local Wellness Policy

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.

At a minimum, SFAs must permit participation by the 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.

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:

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

Smart Snacks in Schools

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

All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new "Smart Snacks" regulation that became effective July 1, 2014. Information on this regulation, along with a product calculator to help determine

compliance of various food items, can be found on our <u>Smart Snacks</u> webpage at (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school site per school year, per the district's approval. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our Smart Snacks webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Professional Standards

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

The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.

Each SFA must designate at least one staff member as a program "director". A program "director" is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

The <u>hiring standards for SFA directors</u> 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: New Food Service Director Hiring Requirements

<u>Professional Standards: Training Requirements</u>

- 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).

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.

Water

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

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

Food Safety and Storage

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

<u>A Flash of Food Safety</u> is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes).

Food Safety Plans

All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the SNT Food Safety webpage. (https://dpi.wi.gov/school-nutrition/food-safety)

Food Employee Reporting Agreements

All food service employees must have a signed <u>Food Employee Reporting Agreement</u> on file (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf).

Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Storage

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

The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.

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 during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Sharing and No Thank You Tables

Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.

Sharing Table

A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

No Thank You Table

A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, a designated worker or trained individual must inspect the items for wholesomeness.

Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, prekindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.

Considerations

- 1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
- 2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
- 3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.

- 4. Parents will be informed in writing.
- 5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
- 6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
- 7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
- 8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

Wholesome Leftovers

Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. "Wholesome" must be defined by the SFA as part of the SOP.

Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.

Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

Monitoring Log

Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the <u>Food Safety</u> webpage (https://dpi.wi.gov/school-nutrition/food-safety).

Findings and Corrective Action Needed: Food Safety

Finding: The food employee reporting agreements were not available.

Corrective Action Needed: Complete all food employee-reporting agreements. Submit copies of completed agreements as an attachment to assigned DPI Nutrition Program Consultant. **Corrected onsite no further action needed**.

Finding: The finding was that a sharing table is being utilized during meal service. There was no standard operating procedure (SOP) in place for the sharing table. Additional, the sharing table must be monitored throughout meal service.

Corrective Action Needed: Please submit a statement on either how the SFA will correct the practice of utilizing the sharing table or if the school will discontinue using the table. If the SFA plans to continue the practice of the sharing table please submit a Standard operating procedure (SOP).

Buy American

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

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with
 proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of
 market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT <u>Procurement</u> webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed: Buy American

Finding: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

Cauliflower -Mexico Broccoli-Mexico Mixed Vegetable-Canada Canned pineapple- Indonesia

Bananas-Guatemala

Corrective Action Needed: Begin using a *noncompliant product list form* for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A <u>template form</u> is located on the procurement webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx). **Corrected on-site no further action needed.**

Reporting and Recordkeeping

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

All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

<u>Summer Food Service Program (SFSP) Outreach</u>

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

Resources:

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

While Trinity participates in a summer feeding program with other churches in the area through their own program, **technical assistance** was provided to be sure that the SFA reaches out to households regarding the *Summer Food Service Program* under the UDSA federal program.

5. OTHER FEDERAL PROGRAMS REVIEWS

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

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



With School Nutrition Programs!