

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

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**School Food Authority:** Roncalli High School

**Review Date(s):** April 22-23, 2019

**Agency Code:** 367269

**Date of Exit Conference:** April 23, 2019

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at a nominal charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- Wisconsin Team Nutrition is hosting a *Teaming Up to Increase Participation* workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop) webpage (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Roncalli High School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The DPI review team appreciates the eagerness of the staff at Roncalli High School for their willingness to make alterations to meet school meals program regulations. Thank you!

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Commendations:

- ✓ All free and reduced price meal applications were approved and denied correctly.
- ✓ The Benefit Issuance (BI) list is produced from the SFA's software and accurately maintained.
- ✓ The Application Packet includes all required components.

##### Technical Assistance:

##### *Free and Reduced Meal Applications*

- The Determining Official (DO) initially determines a student's eligibility based on an application, and then signs the back of the application. The Confirming Official (CO) and Verifying Official (VO) only need to review and sign the backs of applications during the Verification process. The VO verifies the original determination made by the DO, and then the CO confirms what has been verified by the VO.
  - The DO and VO may be the same person, but the CO can never be the DO or VO. The Hearing Official (HO) cannot be any of the other three officials.
- Step 2 on an application requires a program name and 10-digit program number in order for the student(s) to be categorically eligible for free meals. Badger Care or Medicaid are two programs that **do not** qualify student(s) for free meals.

##### *Direct Certification*

- Direct Certification (DC) must be run at the following times:
  - At or prior to the beginning of the school year (as early as the second week of July)
  - Three months after the initial run
  - Six months after the initial run
  - On or before April 1

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#### Verification

##### Commendations:

- ✓ Verification was completed between October 1 and November 15.
- ✓ The Verifying and Confirming Officials do a fantastic job of tracking the Verification process and have a thorough understanding of the purpose and requirements.

##### Technical Assistance:

- Verification is considered complete once the “We Have Checked” letter has been sent. This letter should be dated and sent to households by no later than November 15.
  - The Standard Sampling Method for the Verification process is only required when 20% or more of the applications selected for Verification in the previous school year did not respond to the request for income documentation (i.e. 20% non-response rate).
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### Meal Counting and Claiming

#### Commendations:

- ✓ The SFA has a great point of service (POS) for counting reimbursable meals at lunch.
- ✓ Monthly edit checks are completed and reviewed prior to submitting claims for reimbursement.

#### Technical Assistance:

- **Visiting students may be claimed for reimbursement so long as they are served reimbursable meals.** These students may be claimed at the paid rate, unless eligibility documentation is acquired from the visiting students’ schools qualifying them for higher benefits.
- USDA regulations require school agencies to complete an edit check for each of its schools that participate in the NSLP prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools’ lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made.
- If ever a claim needs to be modified, please see instructions within the [DPI SNT Claiming Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/site-based-claiming-manual-accessible-version.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/site-based-claiming-manual-accessible-version.pdf). There are different instructions for whether a claim is *processed* or *unprocessed*.

#### Resources:

- [DPI SNT Edit Check](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/monthly-edit-check.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/monthly-edit-check.doc)
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## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Comments/Technical Assistance/Compliance Reminders

#### **Week of Review (March 11-15, 2019)**

All meal pattern requirements were met except on Monday, March 11th when there was a daily meat/meat alternate shortage with the Thai chili chicken recipe. Based on recipe instructions each serving only provided 1.5 oz eq meat/meat alternate per serving and students did not have access to another meat/meat alternate on the line. This is short the daily required amount of 2 oz eq meat/meat alternate for high school students. This daily shortage led to a weekly meat/meat alternate shortage.

#### **Onsite Meal Observation**

It was great to see all the fruit and vegetable offerings on the service line, in addition to the signage indicating how much of each item a student must select in order to take a ½ cup serving size. One sign, however, must be changed to align with USDA Offer vs. Serve requirements. The sign reads, “Take 2 vegetable or 2 fruit or a combination”, because each fruit and vegetable on the serving line is portioned in ½ cup serving sizes, this sign requires students to take at least 1 cup fruit, vegetable or combination of the two. According to the Offer vs Serve guidelines, a student only need to have at least a ½ cup fruit,

vegetable or combination on their tray (including two other full components) in order to be considered a reimbursable meal. Do not confuse this with what must be offered to students. High School students must still be offered at least 1 cup of fruit and 1 cup of vegetable daily. In summary, the school must OFFER the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal at lunch (refer to the [lunch meal pattern table](#)). From these offerings, students must SELECT at least three full, different, food components, one of which is at least a ½ cup fruit and/or vegetable. For more information on Offer vs. Serve visit the [NSLP menu planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

This was discussed with the food service director and the signs was updated to say, “take **at least 1** vegetable or 1 fruit or a combination.” Reimbursable meal signage was posted that indicates that ½ cup of fruit or vegetable is required therefore this statement is acceptable as long as all serving sizes continue to be a ½ cup for fruits and vegetables.

### **Breakfast**

Currently Roncalli High School offers breakfast options a la carte. Consider participating in the School Breakfast Program (SBP). Participation in SBP will enable the SFA to help students start their school day with good nutrition and provide reimbursement to you for doing so. The current set up could be easily switched over to the school breakfast program by offering at least 1 cup fruit (may be in the form of a fruit cup and a 4 fl.oz. juice) and milk, in addition to the grains already offered. Furthermore, the students who are considered free or reduced price would now have access to come and receive a nutritious breakfast by offering the School Breakfast Program. In the current set-up, these students may not have the financial means to purchase a breakfast a la carte. This would allow all students to participate in school breakfast (regardless of their financial situation) and Roncalli High School can receive additional reimbursement for those meals served.

Visit the DPI [School Breakfast Program](#) webpage for more information. Lastly, consider sending this [School Breakfast brochure](#) to families and caregivers to promote the benefits of breakfast (https://dpi.wi.gov/school-nutrition/school-breakfast-program).

### **PBJ - Alternate meal options**

One of the alternate meal options is a peanut butter and jelly sandwich. One sandwich is 1 oz eq meat/meat alternate and 1 oz eq grain. High School students must take two sandwiches in order to count it as two full components. A full component for a high school student is 2 oz eq meat/meat alternate or 2 oz eq grain. When considering Offer vs. Serve, if a student were to only select one sandwich, they would not have selected a full component or either the meat/meat alternate or the grain. The student would need to select an additional meat/meat alternate and/or another grain in order to count one or both of those components as full components. This is problematic considering there is no other meat/meat alternate or grain options for those students to select. You may choose to purchase and offer a 4.8 oz sandwich which provides 2 oz eq meat/meat alternate or 2 oz eq grain (be sure to check the crediting documentation to verify), you may require students to select two sandwiches or you may bundle one sandwich with a cheese stick (or yogurt) and crackers.

### **Standardized Recipes**

Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich). This includes any prepared menu option on the a la carte line. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and

yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes.

Recipes should be standardized to your kitchen to reflect the products and practices that are used in your kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

For more recipe ideas, refer to [USDA's What's Cooking? Recipes](https://whatscooking.fns.usda.gov/) that include nutritional and crediting information. They are a great resource to use in USDA School Meals Programs for cooking healthy and tasty recipes. Note: even though USDA refers to these as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they have been tried, tested, and adapted to your food service operation. (https://whatscooking.fns.usda.gov/).

We also encourage viewing the webcast, [What's the Yield with Standardized Recipes?](https://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (https://dpi.wi.gov/school-nutrition/training/webcasts#sr).

The following recipes were either missing or not standardized to your kitchen. Please create and/or update the recipes in use.

- Hummus alternate entree
- Spaghetti recipe
- Thai chili chicken

### **Summer Training**

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, crediting, smart snacks and record keeping requirements. Travel/meal expenses are allowable food service expenses.

The following classes are recommended for food service workers: Build a Better Breakfast, Smart Snacks, and Standardized Recipes.

The 2019 School Nutrition Skills Development Courses (SNSDC) dates and locations have been released:

- Appleton (Fox Valley Technical College): July 16-18, 2019
- Milwaukee (Alverno College): July 23-25, 2019
- Rice Lake (Wisconsin Indianhead Technical College): July 30-August 1, 2019
- Middleton (Kromrey Middle School): August 6-8, 2019
- Wausau (Northcentral Technical College): August 13-15, 2019

Registration and class schedules will be posted to the website in early May. Please visit the [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage for more information (https://dpi.wi.gov/school-nutrition/training#up).

Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts](#) webpage.

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

## Crediting documentation

For grain products (tortilla shells, hamburger buns, cookies, pretzels etc. be sure to keep the ingredient list along with any other information you may about the product. In this way, the review can verify that the product is whole grain-rich. The ingredient lists for these products were reviewed onsite and determined to be compliant with the whole grain-rich requirements.

The terms “wheat” or “made with whole grains” on a product label do not necessarily mean that a product is whole grain-rich. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as whole grain-rich.

Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients, making the product whole grain-rich. Note: a recipe that includes 50 percent whole grain and 50 percent enriched grain by weight is considered whole grain-rich. USDA has a very thorough [Whole Grain Resource](https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

## Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. The production records in use were missing a few pieces of required information:

- Menu type (e.g., lunch)
- Grade groupings
- Planned and actual number of meals served
- Milk usage

It is recommended to separate the planned serving size from the crediting of each food item.

A list of production record requirements (“[Must Haves and Nice to Haves](#)”) and sample production record templates can be found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

## **Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality**

**Finding #1:** Daily and weekly meat/meat alternate shortage at lunch.

**Corrective Action Needed:** Submit a statement that states what will be done to correct this daily and weekly meat/meat alternate shortage (by correcting the recipe to yield 2 oz eq meat/meat alternate per serving the weekly meat/meat alternate shortage will be corrected).

❑ **Finding #2:** The Thai chili chicken recipe does not include enough chicken strips in order to credit as 2 oz eq meat/meat alternate per serving.

**Corrective Action Needed:** Correct and submit the Thai chili chicken recipe to include enough chicken strips in order to credit as 2 oz eq meat/meat alternate per serving. For 80 servings, the recipe must include at least 12.5 pounds of chicken strips in order for each serving to credit as 2 oz eq meat/meat alternate.

❑ **Finding #3:** Production records missing key pieces of information including, menu type, grade groupings served, planned and actual number of meals served and daily milk usage. Refer to the [production records requirements](#) list to ensure all pieces of information are recorded.

**Corrective Action Needed:** Submit one week of completed production records that include all of the required information.

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

### 3. SMART SNACKS

#### Comments/Technical Assistance/Compliance Reminders

##### **Smart Snacks**

All a la carte food options that were not menued that day on the main line or on the previous day's main line must have acceptable portion sizes to be compliant with the Smart Snacks standards. Many times these entree options contain too many calories, total fat and/or sodium to be compliant with Smart Snacks standards.

Entrees may only be exempt from the Smart Snacks nutritional standards when they are offered the day the same item is sold on the main line, or the day after the entree item was menued on the main line. Additionally, accompaniments such as cream cheese or cheese sauce need to be included in the nutritional analysis. This means that if marinara or dipping sauce were to be sold with a breadstick or mozzarella stick, then the calories of the dipping sauce would need to be added to the nutritional information of the entree item it is paired with. When the nutritional information is calculated for the entree and the accompaniment then it must be entered into the [Smart Snacks product calculator](#) to determine compliance.

This process of determining compliance is also true for any recipe item sold a la carte (salads, sandwiches, wraps, veggies and dip etc.), that is not menued that day on the main line or was not menued the previous day.

Smart Snacks regulations allow entrees to be sold a la carte and be exempt from the nutritional standards, if and only if, they were served the same day or the day after the original entree was served on the main line.

Currently students are able to select their serving size of cereal and cream cheese for their bagels. This is not an acceptable practice. The food service director must set an intended serving size for every a la carte option. This nutritional information for this serving size must then be put into the [Smart Snacks product calculator](#) to determine compliance. This was reviewed onsite with the food service director.

Non-compliant products:

- Honey bunches of oats - calories exceeded per 1 cup serving
- Jimmy Dean Delights English Muffin - not whole grain-rich, which does not meet the Smart Snacks general standards.
- 12 piece serving of Popcorn Chicken - calories from total fat exceed 35% and calories from saturated fat are not less than 10%.
- 4 chocolate chip cookies (sold together) - calories exceed 200 and sodium exceeds 200 mg.
  - Students could either purchase one cookie individually or four for a discounted price. This practice of bundling multiple cookies must be discontinued immediately, as it is incentivizing unhealthy food choices. Not only that, when four cookies are served together the nutritional information for all cookies must be combined and entered into the Smart Snacks Calculator. One cookie by itself does meet Smart Snacks standards but four do not. Each cookie should be priced individually and must be sold separately.
- 2oz package of tortilla chips - calories exceed 200, calories from total fat exceed 35% and sodium exceeds 200 mg.
- Blueberry, chocolate chip, cinnamon raisin, and plain bagels are not whole grain-rich. The first ingredient listed in the ingredient list is not a whole grain.
- Tony's French Bread Pizza made with Whole Grain (Mozzarella and Pepperoni) - calories from total fat exceed 35%, calories from saturated fat are not less than 10% and sodium exceeds 480 mg.
- Tony's French Bread Pizza made with Whole Grain (Multi Cheese) - calories from total fat exceed 35%, calories from saturated fat are not less than 10%, and sodium exceeds 480 mg.

This is not an exhaustive list. The food service director must review each entree option sold a la carte for compliance with the Smart Snacks nutrition standards.

### **Fundraisers**

All foods or beverages sold to students during the school day for a fundraiser must meet Smart Snack standards. If they do not, even though the sales are an infrequent occurrence, they must follow the regulations as stated below:

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Documentation is required for school fundraisers. Keep records of school fundraisers, both compliant and noncompliant. Using DPI-provided tracking tools is a great way to make sure schools are meeting Smart Snacks regulations.



The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

### **Vending Machine**

There is a beverage vending machine in the cafeteria. All products are compliant upon review onsite; however, there was no documentation to support this. Be sure to maintain the documentation for the products sold for compliance verification. If any products should change, be sure to update your documentation and include the new products labels.

### **Findings and Corrective Action Needed: Smart Snacks**

❑ **Finding #4:** Products sold a la carte not checked for Smart Snacks compliance.

**Corrective Action Needed:** Submit a statement that explains what changes will be made to ensure that all products comply with the Smart Snack regulations. Use the [Smart Snacks in a Nutshell](#) to review the guidelines and utilize the [Smart Snacks product calculator](#) to help to determine product/meal compliance. Include specifics on who at the school will be responsible for assessing products for compliance, how documentation will be kept and the timeframe for when this will be complete.

❑ **Finding #5:** Documentation not maintained for beverages sold to students in the vending machine located in the cafeteria.

**Corrective Action Needed:** Submit a statement that details who at the school will be responsible for tracking Smart Snacks vending and how documentation will be kept.

## **4. BUY AMERICAN PROVISION**

### **Commendations**

The food service director has completed non-compliant product sheets for the food items that are non-domestic. Continue to review products before purchasing, as you are receiving them, and fill out any additional non-compliant product sheets as necessary. Below is additional information about the Buy American Provision.

### **Comments/Technical Assistance/Compliance Reminders**

The USDA requires that School Food Authorities (SFAs) purchase, to the maximum extent practicable, domestic commodities or products. It is each school's responsibility to ensure USDA dollars are spent on American grown products. Non-domestic items must have sufficient documentation, as outlined below.

A "domestic product" is defined as an agricultural commodity or product that is produced or processed in the United States (U.S.), including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands. "Substantial" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically.

If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted in an email. Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

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

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

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

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Include the Buy American Provision in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory are compliant with the Buy American procedure. Sample written [Procurement Contract Management Procedures](#) and Buy American monitoring procedures may be used and adjusted to meet the SFA's needs (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>).

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## 5. RESOURCE MANAGEMENT

### Non-profit School Food Service Account

#### Commendations:

- ✓ The Annual Financial Report (AFR) is completed annually and is an accurate reflection of Roncalli High School's food service program
- ✓ Indirect costs are not charged to the food service account
- ✓ A separate ledger for the food service account is maintained
- ✓ All costs to the food service account are allowable
- ✓ The food service account maintains a non-profit status

#### Technical Assistance:

##### *Annual Financial Report (AFR)*

- **The entitlement value of USDA Foods (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP. Any handling and processing fees must be recorded as a School Purchased Services Expenditure.**
  - The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services webpage](#) ([dpi.wi.gov/nutrition/online-services](https://dpi.wi.gov/nutrition/online-services)).
- Each food service employees is able to have one free meal with each meal service. They are not required to pay unless they purchase items beyond the single meal.
- The review team would like to emphasize the importance of the business manager's school meals program training. As she oversees many requirements related to the school meals programs, for the purpose of maintaining the integrity of these programs, she must continue to search for and complete annual trainings.

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

**Finding #6:** Roncalli High School does not have an Unpaid Meal Charge policy explaining how negative meal balance accounts will be handled by the SFA. This policy is required to be communicated to households at the start of each school year.

**Corrective Action Needed:** Please upload a draft Unpaid Meal Charge policy into SNACS.

#### Resources:

- Reference the [Unpaid Meal Charge Policy In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) for more details on this policy's requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf)
  - [Recommended topics for delinquent/bad debt policies for SFAs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/delinquent-bad-debt.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/delinquent-bad-debt.pdf)
- Consider applying for an equipment grant. More information is on the [USDA Equipment Grant webpage](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) (https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant).

### **Paid Lunch Equity (PLE)**

The Paid Lunch Equity (PLE) tool was not required for Roncalli High School during the 2018-19 school year, as it had a zero or positive fund balance in its food service account as of January 31, 2018. **For the 2019-20 school year, a similar exemption will take place with the completion of the [2019-20 PLE survey](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) by June 7, 2019** (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

### **Revenue from Non-Program Foods**

#### **Commendations:**

- ✓ Non-program foods are reported on the AFR

#### **Technical Assistance:**

- The adult meal prices on Roncalli High School's online contract is \$4.00, however an adult meal on site was charged as \$3.90. While \$3.90 still follows adult meal prices requirements, please be aware of and rectify this discrepancy in the future.

#### **Findings and Corrective Action Needed: Revenue from Non-Program Foods**

**❑ Finding #7:** The SFA has not demonstrated compliance with the [USDA Non-Program Foods Revenue Rule](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf), as the DPI nor the USDA Non-Program Foods Revenue tool has not been completed (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf)

**Corrective Action Needed:** Utilizing a 5-day reference period, please complete the USDA or DPI tool and upload into SNACS.

#### **Resources:**

- [DPI Non-Program Foods Revenue tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx)
- [USDA Non-Program Foods Revenue tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr\_tool.xls)

## 6. GENERAL PROGRAM COMPLIANCE

### Civil Rights

#### Commendations:

- ✓ The PI-1441 Civil Rights Self-Compliance form was completed
- ✓ The Public Release was completed
- ✓ Documents and resources are made available in other languages for household with limited English proficiency

#### Technical Assistance:

- USDA's Non-Discrimination Statement must be listed on all communications with the public regarding the school meals programs. ***This institution is an equal opportunity provider*** or the [lengthened statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) must be used (dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights).

#### *Civil Rights Complaint Procedures*

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. You will want to make sure that this is included in the district procedures to ensure compliance.
  - The 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](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\_combined\_6\_8\_12.pdf).

#### Findings and Corrective Action Needed: Civil Rights

**Finding #8:** The USDA Non-Discrimination Statement was either incorrect or not included on the following items: "We Must Check" letter for Verification, Local Wellness Policy, and school meals programs outreach letter at the beginning of the school year.

**Corrective Action Needed:** Please update these items and upload them into SNACS.

**Finding #9:** The civil right complaint procedures are not specific to discrimination within the school meals programs.

**Corrective Action Needed:** Please update the civil rights complaint procedures that satisfy the information in the Technical Assistance section on Civil Rights Complaint Procedures, and then upload into SNACS.

❑ **Finding #10:** The annual Civil Rights training attendance log is not maintained.

**Corrective Action Needed:** Please upload into SNACS a statement detailing who will complete the civil rights training annually and how it will be logged.

**Resources:**

- [DPI SNT Civil Rights attendance log](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights)
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**Local Wellness Policy**

**Commendations:**

- ✓ Roncalli High School's current LWP contains all required components and really great, very specific goals!

**Compliance Reminders:**

- All members of the community are encouraged to participate in a school's LWP. This includes, students, school staff, parents, business owners, and anyone else in the community.
  - The LWP must be formally assessed every three years; this is called the Triennial Assessment. For more resources, see [DPI SNT's LWP webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy).
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**Professional Standards**

**Technical Assistance:**

- Annual Professional Standards training requirements are in place to uphold the nutritional and fiscal integrity of the school meals programs. The annual training hours are required:
  - Food service director: 12 hours
  - Food service manager: 10 hours
  - Full-time staff: 6 hours
  - Part-time staff: 4 hours
- The following are required to have their annual Professional Standards trainings **tracked**:
  - School nutrition directors, managers and staff, plus persons acting in these roles for more than 30 days per year.
  - School nutrition substitutes and volunteers, cashiers determining reimbursable meals at Point of Service (POS), office staff with school nutrition program duties (submitting claims for NSLP, SBP, ASP, SMP, WSDMP and/or FFVP, processing free and reduced price applications, verification, or financial management).
- SFAs may use the DPI Professional Standards tracking tool, or it may create its own. The trackers must include the following information:
  - Employee name
  - Date of hire
  - Employee position
  - Full-time or part-time
  - Completed trainings and length of these trainings

**Resources:**

- [DPI Professional Standards tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx)
  - [Professional Standards training requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf)
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### **Food Safety and Storage**

#### **Commendations:**

- ✓ The Food Safety Plan for Roncalli High School contained all required elements
  - ✓ The most recent food safety inspection report was publicly posted
  - ✓ Two food safety inspections were completed in the previous school year
  - ✓ There is a certified food safety manager on site for the SFA
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### **Reporting and Recordkeeping**

#### **Technical Assistance:**

- All records are to be maintained for three years plus the current school year. Temperature logs may be discarded after six months.
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### **Summer Food Service Program (SFSP) Outreach**

#### **Technical Assistance:**

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

#### **Compliance Reminders:**

- A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, **USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months.** SFAs can inform families of summer meals via the following methods:
  - Promotion of the [summer meals locator](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 webpage](http://www.fns.usda.gov/summerfoodrocks) (http://www.fns.usda.gov/summerfoodrocks)

#### **Findings and Corrective Action Needed: SFSP**

- Finding #11:** SFSP outreach was not completed.

**Corrective Action Needed:** Upload a completed draft of the outreach poster listed under *Resources* into SNACS.

**Resources:**

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

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

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

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



*With School Nutrition Programs!*