USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Blessed Sacrament Agency Code: 407015

School(s) Reviewed: Review Date(s): 1/23, 1/24, 2019 Date of Exit Conference: 1/24/2019

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, 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, and 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 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 do 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 (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Blessed Sacrament Elementary School for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The office personnel does a wonderful job in keeping all paperwork for the meal programs very well organized.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Blessed Sacrament is a CEP school currently in Cycle Year 1. All students eat free.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Direct Certification

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

<u>Commendations/Comments/Technical Assistance/Compliance Reminders</u>

Blessed Sacrament is a CEP school, Cycle Year 1.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Verification

☐ Finding: The CEP Verification Report was completed on site even though the deadline was not until Feb. 1, 2019. No further action needed

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created <u>Field</u>
 <u>Trip meal resources</u> to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- The meal counting and claim for the Review Month was conducted perfectly.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.

REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an ala carte item.

This is a CEP school, and no errors were found in counting and claiming during our review for Blessed Sacrament Elementary School.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Authorized Representative, Food Service Director, and school nutrition professionals of Blessed Sacrament School as well as to the Executive Administrator, President and CEO, and Nutrition Team of Fresh & Safe. We appreciate your time and efforts spent preparing for and participating in the onsite review. Special thanks to the Executive Administrator, who responded to numerous questions and requests for additional information. The Nutrition Team was receptive to feedback and asked questions reflective of their desire to better understand program requirements and resources and to better serve schools in Milwaukee, including Blessed Sacrament School.

<u>Technical Assistance and Program Requirement Reminders</u>

Standardized Recipes

A standardized recipe is defined as one that has been tried, tested, evaluated, and adapted for use by food service. It produces a consistent quality and yield every time, when the **exact** procedures, equipment, and ingredients are used. Recipes must be updated to reflect current practices and products. Standardized recipes exist but do not accurately reflect what happens in the kitchen. Additionally, serving notes contradict ingredients and procedures on standardized recipes as well as planned portion sizes and meal pattern contributions on production records.

Use the resources on the <u>Standardized Recipes webpage</u>, including a checklist for pieces of information needed to standardize a recipe; tools to help analyze the meal component contribution; nutrient analysis

tools; and templates to organize all information once obtained

(http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes, https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc).

Copies of Recipe Standardization Steps and Standardized Recipe Checklist were left onsite with the Executive Administrator (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/recipe-standardization-steps.pdf; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf). The Public Health Nutritionist (PHN) also encourages viewing the webcast, "What's the Yield with Standardized Recipes?," which guides the viewer through the recipe standardization process (http://dpi.wi.gov/school-nutrition/training/webcasts#sr).

<u>USDA's What's Cooking? recipes</u> include nutritional and crediting information (https://whatscooking.fns.usda.gov/). Although USDA refers to these as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they are tried, tested, and adapted to your food service operation.

The PHN discussed the recipe standardization process with Fresh & Safe personnel during the onsite review. Recipes shall be tried, tested, evaluated, and adapted prior to entry and nutrient analysis in Nutrikids. All modifications and substitutions must be documented.

Consider Nutrikids Menu Planning 101 & Advanced Workshops, which provide overviews of the basics (e.g. enter ingredients, create recipes, build new menus, get a nutrient analysis and other needed reports, etc.) and advanced features (e.g. copy menus, analyze and modify menus to meet dietary guidelines, enter production quantities, create production records, etc.). For more information or to register for online webinars, visit the Heartland School Solutions Upcoming Product Training webpage (https://www.heartlandpaymentsystems.com/school-solutions/training-event-category/nutrikids).

Crediting information recorded on the standardized recipes and the production records was not consistently in agreement with crediting information on the supporting documentation, such as Child Nutrition (CN) labels, product formulation statements (PFS), or the Food Buying Guide. Update standardized recipes for Corn Green Bean Mix (001446), Green Bean and Carrot Mix (001389), Salad Mix with Garnish (001445) to credit corn, green beans, carrots, spinach, and tomatoes towards their appropriate subgroups based on **volume** measurements used to prepare the recipes. Ensure the procedures and serving for Chicken Quesadilla (000851), Chicken Tacos (001468), and Spanish Rice (001111) are consistent with ingredients and intended meal pattern contributions.

Recipe Analysis Workbook

The <u>Recipe Analysis Workbook</u> is a tool used to determine the expected meal pattern contribution and crediting statement for a recipe (https://foodbuyingguide.fns.usda.gov/Appendix/ResourceAppendixA). The <u>Recipe Analysis Workbook</u> consists of a worksheet for each meal component. This workbook is a tool for calculating the meal pattern contribution of a recipe's ingredients toward the vegetable (expressed in subgroups), fruit, meats/meat alternates, and grains components of the Federal meal pattern requirements. An interactive, web-based <u>Recipe Analysis Workbook</u> is available <u>on this website</u> (https://foodbuyingguide.fns.usda.gov/Raw/Index). Determining meal pattern contributions for recipes is an important step in ensuring that meals served are nutritious and meet Federal meal pattern requirements.

Grains

Grain-Based Desserts

Grain-based desserts designated with a superscript 3 on Exhibit A are allowed only as dessert at lunch as specified in §210.10. As Wet Apple Pie is not a dessert pie, the PHN strongly suggests renaming this menu item to more accurately represent a serving of fruit at breakfast.

Whole Grain-Rich Requirement

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. The following grain products are not WGR: Kellogg's Frosted Flakes cereal, Kellogg's Apple Jacks cereal, Kellogg's Corn Pops cereal, and hard shell tacos (SUPC: 6798698). USDA has a very thorough Whole Grain Resource that provides tools and tips for identifying whole grain-rich products

(http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

Amount of Creditable Grains

When the exact or minimum amount of creditable grains can be documented, the grain contribution may be calculated using 16.0 grams of creditable grains as 1.0 oz eq. Reference "Determining Serving Sizes Based on Creditable Grain Content" under the Grains Meal Component of the USDA Food Buying Guide for Child Nutrition Programs (https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs).

Weight versus Volume

There is a difference between weight (ounces [oz]) and volume (fluid ounces [fl oz]). While spoodles are referred to and labeled with "oz," they actually measure "fl oz." Therefore, a "4 oz spoodle" measures 4 fluid ounces or 1/2 cup (volume), not 4 ounces (weight). Most foods measured with a 4 fluid ounce spoodle will not weigh 4 ounces on a scale. This is an important distinction.

	Measures	Measured In	Conversions	Tools Used
WEIGHT	Meat/meat alternates Grains	Ounces (oz) Grams (g) Kilograms (kg) Pounds (lb or #)	1 lb = 16 oz 1 oz = 28 g	Scale
VOLUME	Fruits Vegetables Milk	Fluid ounces (floz) Tablespoon (T or TBSP) Teaspoon (t or tsp) Cups (c) Pint (pt) Quart (qt) Gallon (gal) Liter (L)	3 tsp = 1 TBSP 16 TBSP = 1 c 1 c = 8 fl oz 1 pint = 2 c 1 quart = 2 pints 1 gallon = 4 quarts	Spoodles, measuring cups, measuring spoons, scoops, dishers, ladles

^{*}WEIGHT AND VOLUME ARE NOT EQUAL OR INTERCHANGEABLE. OUNCES ≠FLUID OUNCES

USDA Food Buying Guide for Child Nutrition Programs

The <u>USDA Food Buying Guide</u> for <u>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/foodbuying-guide-for-child-nutrition-programs). Fruits, vegetables, and unprocessed grains, meat/meat alternates (m/ma), 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 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 <u>recorded webinar</u> (https://youtu.be/UP_t3D7AYAM) on the <u>Food Buying Guide Goes Digital! webpage</u> of the USDA 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. 1/2 cup green peas will credit 1/2 cup starchy vegetable) and the FBG will note if the crediting is different based on volume served (e.g. one orange, fresh, 138 case count credits 1/2 cup fruit). Reference the School Nutrition Team (SNT) Half-Cup Crediting of Fruits and Vegetables Handout for amounts required to credit as 1/2 cup as well as suggested serving sizes (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf). If the product is not listed in the FBG, additional crediting documentation is required.

Remember, always round up when calculating how much food to buy. Always round down when calculating the creditable amount of food towards meeting a meal pattern requirement.

Portion Control

Proper portion size utensils should be used. Scoops and spoodles are used to serve fruit, mashed potatoes, rice, and more. They measure different serving sizes and are numbered to differentiate the sizes, such as #8 (1/2 cup), #16 (1/4 cup), etc. The handles are often color-coded; ask the manufacturer for a reference to help correctly identify each scoop size, or refer to "Basics at a Glance Part 2 of Four Parts," available in both English and Spanish from the Institute of Child Nutrition (https://theicn.org/school-nutrition-programs/). Slotted, pierced, or perforated spoodles are important for serving foods prepared in liquid when you do not want to add the liquid to the portion. Measuring cups are used for measuring liquid and dry goods. Metal cups are used for measuring dry goods, and glass cups are used for measuring liquids. Ladles are used for serving soups, gravies, sauces, stews, and creamed foods. If a tool does not measure, it is not a portion size utensil (e.g. tongs, spatulas, spoons). Remember, a pinch or a handful is not a measurement!

To ensure that students receive appropriate amounts of meat/meat alternate, weigh the meat/meat alternate, then determine which scoop will hold that weight of meat.

A <u>portion control eLearning course</u>, focusing on the benefits of portion control when serving food, is available from the Institute of Child Nutrition (https://theicn.docebosaas.com/learn/course/external/view/elearning/16/portion-control).

The school nutrition professionals of Blessed Sacrament School will benefit from production records and program resources in English and in Spanish. Prior to lunch and breakfast meal observations, there was confusion over which serving utensils to use and how to follow serving notes. Per the Executive Administrator, Fresh & Safe intends to translate production records and looks to the Wisconsin Department of Public Instruction and the USDA for more programs resources in Spanish in the future.

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 (SFAs) 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 (e.g. 95 to 110 count pears). In-house Yield Study Procedures are available on the Menu Planning webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning#ihy).

Crediting Documentation

Processed foods that are not listed in the FBG must be accompanied by a PFS or CN label to sufficiently document meal component crediting. Secure a PFS directly from the manufacturer or save a CN label directly off the packaging. Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson).

Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

Current nutrition facts labels, CN labels, and/or manufacturer's PFS clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted. Many labels provided on-site were outdated and did not accurately represent the foods and meals currently being served.

This requirement is outlined in the vended meals agreement template, part B.3.d.: "The Vendor Agrees to maintain full and accurate records that document providing the SFA with daily production/transport sheets indicating how menu items contribute to meal pattern requirements and *supporting documentation for contribution.*"

Farm to School

School gardens are one of the best ways to educate students on nutrition and agriculture while demonstrating where their food comes from. Although starting and maintaining a school garden can seem like a daunting task, the resources on the School Gardens webpage assist with planning and curriculum to create a successful program in your school (https://dpi.wi.gov/school-nutrition/farm-to-school/school-garden)!

Corrective Action

<u>Meal Pattern Finding #1:</u> Kellogg's Frosted Flakes cereal, Kellogg's Apple Jacks cereal, Kellogg's Corn Pops cereal, and hard shell tacos (SUPC: 6798698) are not whole grain-rich products.

Required Corrective Action: Discontinue serving these items. Submit crediting documentation (e.g. CN label, PFS, complete nutrition facts label with ingredient statement) for replacement products.

Meal Pattern Finding #2: Recipes for Sweet and Sour Chicken (001471), Corn Green Bean Mix (001446), Green Bean and Carrot Mix (001389), Salad Mix with Garnish (001445), Chicken Quesadilla (000851), Chicken Tacos (001468), and Spanish Rice (001111) are not standardized to Fresh & Safe.

Required Corrective Action: Submit updated standardized recipes for these menu items, which reflect corrected ingredients, procedures, portion sizes, yields, and meal pattern contributions, as applicable.

Meal Pattern Finding #3: The school nutrition professionals of Blessed Sacrament School will benefit from additional portion control training.

Required Corrective Action: Watch the "What's the Scoop on Portion Control?" webcast (https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story_html5.html) on the SNT Training webpage (https://dpi.wi.gov/school-nutrition/training) or comparable training with prior approval from the Public Health Nutritionist. Please submit certificates of completion (automatic emails) for all school nutrition professionals of Blessed Sacrament School.

Smart Snacks

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

Buy American

If no country of origin is identified on label, and country of origin cannot be located on the distributor's online catalog or website, then the SFA must get certification from 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.

Alternatively, consider the Buy American Provision Attestation for Agricultural Product(s) Purchased Between School and Contractor (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). The 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. For more information, visit the Buy American Provision webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

<u>Commendations/Comments/Technical Assistance/Compliance Reminders</u> Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new 16-17 Annual Financial Report instructions are located on our website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).
- 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" you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

☐ Finding: The Annual Financial Report does not have the following areas broken out by category: Breakfast (food & labor), FFVP labor(fresh fruit & vegetable program).

Corrective Action Needed: Going forward, all revenues and expenses should be broken out by category
on the Annual Financial Report. Watch the DPI Webcast for Completing the Annual Financial Report, and
submit a statement that says you understand the process and going forward will break out all categories
when completing the 2018-2019 AFR. The link is below.
 Webcast with instructions for completing your Annual Financial Report

Paid Lunch Equity

- Commendations/Comments/Technical Assistance/Compliance Reminders Commendations:
 - Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
 - Great job running this tool! The current weighted average for 2018-19 SY tool is (\$2.73).
 - Thank-you for also completing the PLE Survey for the 2018-2019 school year.

Technical Assistance:

- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the <u>PLE 'In a Nutshell'</u> for more information on the PLE tool (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf).
- Refer to the most recent <u>memo</u> from DPI (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf).
- Refer to the most recent <u>guidance memo</u> from USDA (https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf).
- Step by step instructions to completing the PLE tool can be found on our <u>financial website</u> under Paid Lunch Equity (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be
 covered by revenues received from the sale of those foods. Nonprogram foods may not be
 supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service
 account. Thus nonprogram foods may never run in the negative unless non-federal funds are
 transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram 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 nonprogram foods and meeting the USDA nonprogram food regulation (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx).

Nonprogram food revenue	Total nonprogram food costs		
Total program and nonprogram revenue	Total program and nonprogram food costs		

SFAs that sell <u>only</u> nonprogram milk and adult meals as nonprogram foods are <u>exempt</u> from completing the USDA Nonprogram Food Revenue tool
 (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf).

The school does not participate in Ala Carte, nor do they have any Non-Program foods. They also do not have any fundraisers. It is not necessary for Blessed Sacrament to do the Non-Program Food Tool.

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

• DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they

pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.

There were no Indirect Costs found. Nothing further needed.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

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

An attendance list, with printed and signed signatures is on file to show that Civil Rights training was done for the 2018-2019 school year. Nothing further needed.

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. You may use the <u>prototype Medical Statement</u> for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the DPI School Nutrition Team website (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs).
- School food service staff may make food substitutions, at their discretion, for children for whom they
 do not have 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. Accommodations made for students without
 a signed medical statement from a licensed medical practitioner 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, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide the nutrition information from the product you will be using. 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).
- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow's
 milk and pre-approved through DPI. Fluid milk substitution rules apply to all federal school nutrition
 programs, including the National School Lunch Program, School Breakfast, and After School Snack
 Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP, which allows juice as
 a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal.

SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek preapproval for use.

Overt Identification

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

There is not any overt identification at Blessed Sacrament Elementary School. All staff is trained on how to manually mark down the students that take a reimbursable breakfast and/or lunch on a Classroom list specifically designed for breakfast and lunch. In our observation of the SBP & NSLP, the POS process they are using is done carefully and working well. The office manager then enters the names into the computer in the office after the meals are served. She uses a double check method to insure there are no mistakes.

Processes for complaints

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

There is not any overt identification at Blessed Sacrament Elementary School. All staff is trained on how to manually mark down the students that take a reimbursable breakfast and/or lunch on a Classroom list specifically designed for breakfast and lunch. In our observation of the SBP & NSLP, the POS process they are using is done carefully and working well.

Public Release

<u>Commendations/Comments/Technical Assistance/Compliance Reminders</u>

All SFAs are required to distribute a <u>Public Release</u> before the start of the school year (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc). The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must distribute the Public Release to:

- Local news media
- Grassroots organizations (local organizations providing services to populations in need)
- Major employers contemplating or experiencing large layoffs
- Local Unemployment Office (As applicable)

SFAs are not required to pay to have it published but must maintain documentation of whom the release was sent to along with the specific materials distributed.

The Public Release was done for the 2018-2019 school year as per the instructions.

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal
 counts against the attendance-adjusted enrollment. The forms are located on our <u>Community</u>
 <u>Eligibility Provision (CEP)</u> webpage, under the resources for currently participating sites section
 (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility).
- Finding: The On-Site Monitoring Forms were not completed as of our visit.
 - Corrective Action Needed: The forms were filled out and signed while on-site. No further action needed.

Local Wellness Policy

<u>Commendations/Comments/Technical Assistance/Compliance Reminders</u> SFA is required to review and update Local Wellness Policy (1002)

Technical Assistance: The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. Your SFA has not reviewed nor updated your policy within the past three years. Additionally, your SFA does not have documentation indicating when and how the plan is/will be reviewed and updated.

SFA is required to complete an assessment of the Local Wellness Policy (1005)

Technical Assistance: The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at School Nutrition Team's Wellness Policy webpage (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the <u>USDA Wellness Policy webpage</u> (http://www.fns.usda.gov/tn/implementation-tools-and-resources). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your schools report is available at the Wisconsin Health Atlas webpage (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool (<u>WellSAT</u>) for assistance in assessing the LWP (http://wellsat.org/).

Blessed Sacrament School has a very detailed and well written Wellness Policy. It includes all the points listed in the DPI Wellness Policy Checklist. Very well done!

Professional Standards

<u>Commendations/Comments/Technical Assistance/Compliance Reminders</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, volunteer, etc.), professional standards position (director, manager or staff). Learning
 codes are not required, but encouraged. A template tracking tool is posted to our <u>Professional</u>
 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.

The Food Service staff is using the DPI Professional Standards Tracking Tool for all professional standards training hours. All employees working with the Hot Lunch Program are up-to-date with Prof. Standards training hours for this year except 1 staff member, who was hired this school year. She is currently utilizing the DPI webinars, etc. as time during this school year, and recording it in the tracker tool.

Water

<u>Commendations/Comments/Technical Assistance/Compliance Reminders</u>

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.

At Blessed Sacrament, water is available at any time to all students at no cost.

Food Safety and Buy American

<u>Commendations/Comments/Technical Assistance/Compliance Reminders</u>

<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). While you're at it, visit the <u>Office of Food Safety</u> website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

Food Safety Inspections

• Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.

 Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Temperatures

 All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service
 manager/director at work that they are very knowledgeable about food safety practices and safe
 food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. 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)
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Food Employee Reporting Agreements

- All food handlers must have a signed <u>Food Employee Reporting Agreement</u> on file (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf).
- All food handlers 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. (record any notable observations)

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 this 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.

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

Blessed Sacrament receives their food from the vendor Fresh & Safe. They are practicing good food safety measures both inside and outside the kitchen and serving areas. During our review, all personnel working in the kitchen were wearing hairnets, and gloves. They were very neat and clean in preparing the service, serving and cleaning up afterwards. We observed both breakfast and lunch service. The school chooses to offer all meal components to each student, so the trays are filled and then given to the student. The students were very patient in waiting for their trays, and showed very good manners.

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.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. "LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP." Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

Summer Food Service Program (SFSP) and School Breakfast Program (SBP) Outreach Commendations/Comments/Technical Assistance/Compliance Reminders
Findings and Corrective Action Needed: SFSP and SBP Outreach

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the <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)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the <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

☐ Finding: Currently, Blessed Sacrament does not send out any information for Summer Feeding. They do receive some information from the MPS district to distribute to the families, but it was not clear if that was information regarding Summer Meals.

Corrective Action Needed: Refer to the DPI website, for information regarding Summer Food Service Programs available in your area. This was done while on-site, and the address is very near Blessed Sacrament school. You can notify families in several ways: post in place around the school where public/parents can view, distribute paper copies to families, email or post on your schools website. Keep documentation to show what was done each year. Corrected on site, no further action needed.

Breakfast Promotion

The breakfast participation in the Blessed Sacrament Elementary School is lower compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the Serving up a Successful School Breakfast Program guide (http://dpi.wi.gov/school-nutrition/school-breakfast-program).

A Breakfast in the Classroom Toolkit is also available if that option is considered (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our <u>Resources for the School Breakfast Program</u> webpage, in the Marketing Breakfast section (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- <u>Cycle Menu Resources</u> (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/cycle-menu)
- <u>School Breakfast Menus on the Web</u> (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

5. OTHER FEDERAL PROGRAMS REVIEW

Fresh Fruit and Vegetable Program (FFVP)

Commendations/Comments/Technical Assistance/Compliance Reminders

Blessed Sacrament currently is utilizing the FFVP program after receiving a grant for the program. The students are enjoying the fresh fruits and vegetables.

6. COMMUNITY ELIGIBILITY PROVISION (CEP) AND PROVISION 2

Commendations/Comments/Technical Assistance/Compliance Reminders

Blessed Sacrament School is doing a very good job of making sure every student receives a complete breakfast and lunch. They also are utilizing the Fresh Fruit & Vegetable Program through a grant that was received. All students seem very receptive to the meals and snack of fresh fruit or vegetable.

"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 <u>Every Child a Graduate</u> webpage (https://dpi.wi.gov/statesupt/every-child-graduate)."

