

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St Mary's of the Immaculate Conception

Agency Code: 447667

School(s) Reviewed: St Mary's of the Immaculate Conception

Review Date(s): November 7- 8, 2018

Date of Exit Conference: 11/8/2018

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state 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](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) 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](http://smarterlunchrooms.org) 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) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St Mary of the Immaculate Conception 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. It was a pleasure to visit St Mary of the Immaculate Conception.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

Public Release

All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must annually 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 the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Free and Reduced Price Meal Applications

When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding: The finding was that the Public Release was not submitted to the local news media or grassroots organization at the beginning of the school year. Technical assistance was provided.

Corrective Action Needed: Please submit a statement of when the Public Release is required to be sent out each year. Include in the statement to whom the SFA plans to send the Public Release too.

❑ Finding: *The Frequently asked Questions* (Parent letter) that is required to be provided to households each year was not filled out with the SFA information. *The Frequently asked Questions* (parent letter) template posted on the SFA website was also not filled out with SFA information.

Corrective Action Needed: Please provide a statement moving forward how the SFA will correct the *Frequently asked Questions* (Parent letter).

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

Confirming Official

When application(s) are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the household. There is a place for the Confirming Official to sign and date on the back of the application or the tracking tool.

Findings and Corrective Action Needed: Verification

❑ Finding: The finding was that there was a misperception on the role of the confirming official. There was second review of applications after the initial determination, which resulted in the SFA signing all applications in the spot of the confirming official. In addition, the person listed on the contract as the confirming official was not the person who was signing off on the applications, as this was incorrect to begin with. It was apparent that a confirmation review did not take place. Technical assistance was required.

Corrective Action Needed: Please review the [Verification](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) website and submit a statement of what the role of the confirming official is and the purpose of the confirmation review (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).

Meal Counting and Claiming

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ Finding: The finding was that there were seven meals claimed that were not found in the counting and claiming documents. Per SFA a sheet was misplaced with those seven meals.

Corrective Action Needed: This was reported on the S-1 and fiscal action will be applied. No further action needed.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Reviewers loved seeing the colorful fruit and veggie signage in lunchroom, and that the garden bar was placed at the front of the service line. The food service director was organized and has a great understanding of the meal pattern.

Comments/Technical Assistance/Compliance Reminders

Below you will find a list of what was discussed while onsite.

Production Records

- Each food item must be listed on its own line with its own serving size and other pertinent data (eg, BBQ rib and WG bun should not be together on one line, but should each have their own line).
- What you write in for Grades should reflect what meal pattern you are using. Since you are serving the K-8 meal pattern to all students, except the 3K students, your production records should say Grades: K-8, 4k is comingled. You are using a separate production record for the 3K students, and this is acceptable.
- Remember to include the number of meals planned and meals served, including adult meals.
- Remember to round down to nearest 0.25 oz eq for grains and meat/meat alternate crediting.
- Make sure to include units with serving sizes (eg, cups)

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

Recipes

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. 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](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

The following recipes should be updated to include all the required information, including detailed instructions, recipe yield, serving size, and age/grade groups served:

- PBJ Pack
- Yogurt Pak (use the [2 grade/group recipe template](#), since 3K only receives a ½ bagel, not a whole bagel) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-multiple.doc>)
- Cheese sandwich
- PBJ sandwich
- Wildcat Parfait

Determining Crediting In-House

The crust is removed from the PBJ Pak sandwich to resemble an Uncrustable. In order to get accurate crediting of the grain component in the sandwich, it is required to know the weight of the two slices of bread prior to assembling the sandwich and the weight of the crust that is removed when the sandwich is made to resemble an Uncrustable. The reviewer had kitchen staff weigh the above mentioned things while onsite. Reviewer encouraged the kitchen staff to write down their procedures for determining the crediting. You may write this procedure on the recipe itself, or keep it on a separate piece of paper but in the same place where you keep crediting documentation (nutrition facts labels, CN labels, product formulation statements, etc). It’s important to keep this documentation so that reviewers know that staff are calculating the crediting correctly.

Weekly meat/meat alternate (m/ma) shortage - Colby Jack cheese stick

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily as well as the weekly meal pattern requirements. The students are offered the choice of a cheese stick in the PBJ Pak and Yogurt Pak recipe (Colby Jack or Mozzarella). The Mozzarella stick weighs 28g (credits as 1 oz eq m/ma) and the Colby Jack stick weighs 23g (credits as 0.75 oz eq m/ma). Because students are only able to select one cheese stick with their meal, the reviewer must assess meal pattern compliance with the lowest crediting option. Because the Colby Jack cheese stick credits less than 1 oz eq m/ma, this created a weekly m/ma shortage. Discontinue the use of this Colby Jack cheese stick, and be sure to find a replacement that weighs at least 28g.

School Breakfast Challenge

Make this school year the best one yet and see how easy it is to provide a healthy breakfast and a great start for every student. The Wisconsin Department of Public Instruction (DPI) School Nutrition Team is partnering with Hunger Task Force (HTF) and Share Our Strength's No Kid Hungry (NKH) to promote breakfast in Wisconsin schools through the Wisconsin School Breakfast Challenge. The challenge begins December 1, 2018 and ends February 28, 2019.

Schools across Wisconsin are invited to compete for prizes and recognition by increasing participation in their school breakfast program, or to start a new program if they do not already have one. As student participation grows, so do the chances for winning!

NKH will be providing the following amazing prizes:

- Grand Prize: \$1,000 for Highest Breakfast Participation Increase (2 Schools)
- \$750 Prizes for Most Improved Breakfast After the Bell (2 Schools)
- \$750 Prizes for Implementing School Breakfast Program (2 Schools)

Not only is there opportunity to win prizes, but *all participating schools* are eligible to apply for NKH's breakfast grants, totaling \$30,000. For these grants, there is no free and/or reduced price meal percentage requirement.

Ready to get started? [Register your School](#) and visit the [Hunger Task Force](#) website to gather all the details

(<https://docs.google.com/forms/d/e/1FAIpQLSfYzqakQt9WWPnbdD4yGY5iYBP06bxRCXgVgAUpscmtmwW15Q/viewform>; <https://www.hungertaskforce.org/about-hunger/priority-campaigns/school-breakfast-challenge/>). Considering a new School Breakfast Program? Contact DPISBP@dpi.wi.gov.

You may also use this [School Breakfast brochure](#) to share the benefits of breakfast with parents (https://dpi.wi.gov/sites/default/files/imce/wisconsin-school-meals-rock/_files/brochure-get-school-breakfast.pdf).

Field Trip Lunches

Field trip lunches must meet the daily meal pattern requirements, just like the service line in the cafeteria. The daily minimum that must be offered for vegetables is $\frac{3}{4}$ cup. If there is only one vegetable option in the bag lunch, $\frac{3}{4}$ cup must be offered.

Whole Grain-Rich (WGR)

All grains served in the National School Lunch Program must be whole grain-rich. The Sara Lee sandwich bread used during the week of review was not whole grain-rich. It was discussed with the food service director that this bread will be discontinued. The food service director had two other

types of bread in-house that met the whole grain-rich requirement. It was agreed upon that this bread would be used going forward.

Take note that 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>).

Whole Grain-Rich Exemption Request

If you notice a decrease in participation due to having to use 100% whole grain bread, you may fill out an exemption request form. You could provide evidence by either doing a taste test with your students or providing production records that show a decrease in participation. Please read this [DPI memo](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082818.pdf) and read over the [google form](https://docs.google.com/forms/d/e/1FAIpQLSekyp2-qk3kpY2vzb2A1p5N8odO3TlwFZU6gnFt9OuSkOTjoA/viewform) prior to submitting (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082818.pdf>; <https://docs.google.com/forms/d/e/1FAIpQLSekyp2-qk3kpY2vzb2A1p5N8odO3TlwFZU6gnFt9OuSkOTjoA/viewform>). Filling out the form does not mean that you have been granted the exemption. You will have to wait until you get approval from DPI.

Offer Vs Serve (OVS)

Visit our Menu Planning website for more information regarding [OVS resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>).

3K Family Style Meal Service

Great job utilizing family style meal service with the 3K students, the teachers do an excellent job at modeling and engaging with the students. They also do a great job at including the cold lunch kids in the meal service. Well done!

A few comments on meal service:

- Students should be asked if they want milk, rather than opening the cartons and placing it on their trays. It's ok if they do not take a milk, they just have to be offered.
- Remember that supervising adults should actively encourage (but not force) children to try components and accept full portions during the meal. If a child refuses to take one or more food components, he or she should be offered that food again before the meal is finished.

A question asked during the onsite review was, “may the 3K students pay a cheaper meal price?” Yes, they may have a cheaper meal price for the pre-K. Just make sure it is an appropriate price so that the older students do not have to pay more to make up the difference.

For more information on PreK meal pattern visit our DPI page [Infants and Preschool in the NSLP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) for meal pattern tables and other information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Additionally, use this [family style meal service video](https://education.mn.gov/MDE/Video/?group=Educ&id=058099) as another great resource and teaching tool (<https://education.mn.gov/MDE/Video/?group=Educ&id=058099>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding #1:** The Colby Jack cheese stick offered as part of the PBJ Pak (uncrustable) sandwich and the Yogurt Pak only weighs 23g. To credit as 1 oz eq meat/meat alternate the cheese stick must weigh at least 28g. This means that the Colby Jack cheese stick only credits as 0.75 oz eq m/ma. This created a weekly m/ma shortage for the week of review. Because a weekly m/ma shortage was also found during your last administrative review, fiscal action must be assessed. The number of these meals served on the day with the lowest participation will be reclaimed.

❑ **Corrective Action:** submit a statement that says what you will do to fix the weekly m/ma alternate shortage. Please state that you will discontinue the use of this Colby Jack cheese stick and if you choose to find a replacement, please include the product label including the nutrition facts panel.

❑ **Finding #2:** The Sara Lee sandwich bread using during the week of review was not whole grain-rich.

❑ **Corrective action:** submit a statement that says you will discontinue the use of this sandwich bread.

❑ **Finding #3:** The following recipes were missing key pieces of information. Please update to include all the required information, including detailed instructions, recipe yield, serving size, and age/grade groups served:

- PBJ Pack
- Yogurt Pak (use the [2 grade/group recipe template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-multiple.doc), since 3K only would get ½ a bagel, not a whole bagel) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-multiple.doc>)

❑ **Corrective Action:** submit the revised recipes as corrective action.

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

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.

The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.

The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.

These categories of the AFR that should be addressed when tracking revenues and expenditures include:

- Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
- “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.

- Under “Purchases Services” report any time you pay someone for services provides such as equipment repair and health inspections.
- Under “nonprogram foods”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.

When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ Finding: The finding was that adult meals were not broken out in the ledger.

Corrective Action Needed: Please submit a statement of understanding that adult meals will be broken out separately in the ledger.

❑ Finding: The finding was that the WSDMP had not been tracked through the food service fund account the prior school year (17/18). Technical assistance was required with possible corrections needed. The SFA did start this year to breakout the WSDM program costs, revenues, and track them through the food service fund account as required.

Corrective Action Needed: Please submit a statement of understanding about breaking out costs and revenues for the WSDM program and tracking it through the school lunch program.

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

School was at or above equity for the 18/19 School year.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

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 an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.

Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:

- Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
- Utility charges - separately metered or current usage study by the local utility company.
- Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

Findings and Corrective Action Needed: Indirect Costs

□ **Finding:** The finding was that trash removal, custodial and secretarial services were charged to the food service account. The trash and secretarial services had documentation to support these charges to the school food service fund but there was no supporting documentation to show custodial charges.

Corrective Action Needed: Please complete a time study for custodial services and submit a copy of this back to reviewer.

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.

When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement. (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

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

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 individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints. (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Technical assistance was provided to the SFA to add language to include NSLP in the school's current non-discrimination policy. In addition, technical assistance was provided to have the SFA include the full non-discrimination statement on the food service webpage.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. At a minimum, the wellness policy must include:

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

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).

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

Findings and Corrective Action Needed: Local Wellness Policy

□ Finding: The finding was that the wellness policy was not updated with language to reflect current required content areas. A checklist was provided to assist the SFA in developing content in areas needing updates.

Corrective Action Needed: Please submit a timeline of when the SFA plans to update the content areas of the current wellness policy. As a reminder please keep copy of committee meeting minutes.

Smart Snacks

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

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

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

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

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

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).

- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

- Directors: 12 hours
- 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.

Technical assistance was provided to SFA to be sure to provide some training for the staff that do the check off at the beginning of the line. The SFA does a great job in providing training for volunteer staff.

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups. [More information](https://dpi.wi.gov/school-nutrition/food-safety) can be found on the webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Buy American

The food service director is checking products for compliance with this regulation and keeping the required documentation for any non-compliant products. Keep up the great work! Visit the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage for more information on this requirement, including a tool to assist with tracking noncompliant products (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Sharing Table

A [sharing table](https://dpi.wi.gov/school-nutrition/food-safety) is a designated table for items students do not intend to consume (<https://dpi.wi.gov/school-nutrition/food-safety>). 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.

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 a listing of food service staff at that site. The food safety plan must be reviewed annually. A

prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (https://dpi.wi.gov/school-nutrition/food-safety).

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

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

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

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. USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

Resources:

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

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

The Wisconsin School Day Milk Program (WSDMP) was created by the Wisconsin Legislature to reimburse schools for a portion of their costs for serving milk at a milk break to Pre-Kindergarten through Grade 5 students who are eligible for free or reduced price meals.

Only one half-pint of milk may be claimed per eligible student per school day. By State law, no charge can be made to those students who qualify for free and reduced price meals and are receiving free milk under the WSDMP.

Milk served to paid students at the milk break in Grades Pre-K through 5, and students in Grades 6-12, is not eligible for reimbursement. If milk served to students is claimed under the federal Special Milk Program (SMP), it may not be claimed under the WSDMP.

Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one.

Per the *Agreement for the WSDMP* in the points, the SFA agrees to number three that states schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and perhaps include that stipulation in the SFA’s milk bid.

Technical assistance was provided regarding point of service and milk temperatures. For additional guidance, please review the [WSDM webpage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf). There is a question and answer guidance sheet available for guidance.

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

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

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

