

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

School Food Authority: St. Paul's Lutheran School

Agency Code: 53-7804

School(s) Reviewed: St. Paul's Lutheran School

Review Date(s): 3/1/18

Date of Exit Conference: 3/1/18

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:

GOALS

- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

SOCIAL MEDIA

- Submit photos to the School Nutrition Team to be posted on the DPI SNT Facebook page, Twitter page or Instagram page. Send photos to Dana Colla at dana.colla@dpi.wi.gov.

SNSDC TRAININGS

- The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer in Green Bay, Wausau, Rice Lake, Madison and Milwaukee. There will be emails sent in the coming months regarding the trainings available at these locations. You may also check back on the [School Nutrition Team training website](#).

Appreciation/Commendations:

Thank you to the School Lunch Accountant, Food Service Manager, Food Service Staff, Secretaries and Teachers for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. 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.

Thank you for all that you do to feed the students healthy meals! You are much appreciated!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations

Applications were very well documented and determined. When the Determining Official needed to follow up with a household, notes were made on the applications of the new information that was received to support the eligibility status determinations. All eligibility determinations were made correctly. Direct Certification is run early, often, and at the required time frames. Well done!

- 35 eligibility determinations were reviewed; 4 errors were identified.

Technical Assistance/Compliance Reminders

Disclosure

- For any staff that has access to students' eligibility status that isn't within the School Nutrition Office (i.e. IT Department, Principals, Secretaries) they should sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This is to protect the students from any overt identification. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website.

Transferring Students

- If a student had a free or reduced price meal eligibility at his/her prior school district, the school can provide a copy to the district the student is transferring in to.
- The start date of eligibility is the date the Determining Official reviews and determines the application, signing and dating it.
- For students transferring into the district from a different school district who had a free or reduced meal eligibility status from Direct Certification, you must obtain a copy of the original Direct Certification match file with the student's name listed to allow the student to have that eligibility status. A letter from the prior district is not enough and you must have the original supporting documentation to support this eligibility status.

Annualizing Income

- For household applications that list the same pay frequency (i.e. all income listed as bi-weekly), it is not necessary to annualize the income. Annualizing the income when not necessary may change the eligibility status.

Findings and Corrective Action

❑ Finding #1: Four students from one household were originally determined as reduced at the beginning of the school year. The household reapplied in January and the application was mis-determined as free. The students were matched on Direct Certification in February changing their status to free.

Corrective Action Needed: The students' eligibility status changed to free when Direct Certification was run in February. No further action required.

Verification

Commendations

Verification was well done and completed in a timely manner. One application was verified. A confirmation review took place and the Confirming Official signed off on this task. The DPI notification letters were used for Verification, which had all of the required information. The DPI tracker sheet was also used. Great work!

Technical Assistance

- When a household provides a 1040 tax form to show business or farming income, use line 12 for business income and line 18 for farm income. Refer to the [example tax forms](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/visual-application-aid-tax-form.pdf) on the SNT website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/visual-application-aid-tax-form.pdf>).

Meal Counting and Claiming

Commendations

The lunch claim for January was submitted correctly. Great job!

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff at St. Paul's Lutheran School for a great Administrative Review (AR). Thank you to the Food Service Director for submitting documentation prior to the onsite visit as this helped expedite the review. At the position for only a year, the director has doubled lunch participation since starting! She has great rapport with students and it is clear she is passionate about providing healthy, nutritious meals for students. Thank you for all you do!

Technical Assistance

Training

Anyone involved with the United States Department of Agriculture (USDA) School Meal Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Breakfast

Consider participating in the School Breakfast Program (SBP). Participation in SBP will enable the SFA to help students start their school day with good nutrition and provide reimbursement to you for doing so. More information is available on the [School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) webpage (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

Child and Adult Care Food Program (CACFP)

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding

the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

The new Meal Pattern Charts for the CACFP meal pattern can be found on [USDA's CACFP](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf) webpage (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf).

Offer Versus Serve (OVS) in CACFP

Offer Versus Serve (OVS) is not an appropriate service style for pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or, implement family style meal service. When using family style meal service, a sufficient amount of prepared food must be placed on each table to provide the full required portions of each of the food components for all children at the table, and to accommodate supervising adults if they eat with the children. Family style meal service allows children to make choices in selecting foods and the size of initial servings. Children should initially be offered the full required portion of each meal component. 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.

Training resources on family style meals may be found on SNT's [Infant and Preschool in NSLP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

Milk in CACFP

Milk is a required component to be offered to children when using family style meal service. Small, child-size pitchers are recommended for children to serve milk to themselves. Teachers may serve the milk when using family style meal service, however, children must be served the full serving of milk when doing so. A variety of milk does *not* need to be offered under CACFP.

Vegetable Subgroups

Vegetable subgroups are required to be offered weekly to students in specific amounts based on the age/grade group. Keep in mind that green beans are located in the 'other' vegetable subgroup and not in the dark green vegetable subgroup.

Refer to the [vegetable subgroup table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) for more examples

(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf).

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese). 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 the foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

A few recipes used during the review week lacked pieces of information required for standardized recipes. Please use our [recipe tools and resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) to aid in the standardization process (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). There is a

checklist of information necessary to standardize a recipe, calculators to assist with nutrient analyses, and a template to help organize the information. The recipe standardization process will take several times producing the menu item to make sure it comes out the same way. This requires organized record keeping throughout the process.

Production Records

Be specific on production records about the identity, brand, and description of the items served. Production records should indicate exactly what was offered as part of a reimbursable meal. Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

Technical assistance was given for recording salad bar offerings on a salad bar production record. Templates can be found on the [Production Records webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Dietary Specifications

Currently, extras and numerous condiments are offered daily on the salad bar. Items such as ketchup, mustard, croutons, cottage cheese, salsa, sour cream, miracle whip, spicy brown mustard, French dressing, bacon bits, and sunflowers are being offered. Keep in mind that these items still need to be factored into the dietary specifications of fat, saturated fat, calories, and sodium for the week. Consider decreasing the number of extra salad bar offerings as to not put students over in their weekly limits.

Crediting

There is a difference between serving size and crediting (or meal pattern contribution). Most fruits and vegetables credit by volume served (e.g. ½ cup peaches credit as ½ cup fruit). Refer to the [Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (FBG) for more details on how specific ingredients credit toward the meal pattern (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>). Processed products which cannot be credited using the FBG require additional documentation like a Child Nutrition (CN) label or Product Formulation Statement (PFS). These typically will not credit ounce for ounce, meaning one ounce by weight will not credit as 1 oz. eq. M/MA. These will have the crediting directly on them (e.g. a Chicken patty may be 2.5 ounces by weight, but will credit 2 oz. eq. M/MA). When recording on production records, pay careful attention to the serving sizes versus the crediting of the menu item.

Crediting documentation

As a reminder, a CN label or PFS is required for any combination food, meat/meat alternate, or other processed food not found in the USDA *Food Buying Guide* for School Meal Programs. Make sure these are kept on file for all applicable products.

Cycle Menu

Using a cycle menu may ease the burden of menu planning once the cycle has been set and help ensure meal pattern requirements are met after a compliant cycle has been planned (if served as planned). Cycle menus may also aid in purchasing if production records are reviewed and analyzed to forecast meal counts based on historical data.

When using a cycle menu, production records can be partially completed including menu items, crediting information, and serving sizes (potentially planned quantity). Photocopies can be made, or if production records are managed electronically, they can be printed and the remaining information can be completed during production and after meal service.

Offer versus Serve (OVS)

Although no non-reimbursable meals were observed during the day of review, staff are not being trained on OVS on a consistent basis. Consider watching this [OVS Webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html) for a quick refresher (<https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html>).

Exhibit A

[Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf) is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1 oz. eq. for each specific group (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf). Exhibit A groups all grains products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:

- Group A: these products are hard and crunchy and dry and lightweight. Per ounce, they contain a good deal of grain.
- Group B: whether serving bagels, pizza crusts or tortillas, 1 ounce of these products all credit the same towards the meal pattern (1 ounce = 1 oz. eq. grain).
- Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1 ounce of pancake does not credit as 1 oz. eq. like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz. eq. grain.

Exhibit A can be used to credit any of the products that appear in this table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

Findings and Corrective Action Needed

Finding #1: Recipes were not standardized for the grilled chicken sandwich or hamburger on a bun. **Corrective Action Needed:** Submit a standardized recipe for the grilled chicken sandwich and the hamburger on a bun with all required items (e.g. yield, detailed instructions). A [Recipe Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc) may be used (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>).

Finding #2: No crediting information was available for the Tyson Savory Chicken Breast, the french toast, the sausage, or the grilled cheese.

Corrective Action Needed: Please provide crediting documentation for the following products:

- Tyson Savory Chicken breast
- French toast (comes packaged)
- Sausage
- Grilled cheese (comes packaged)

Finding #3: Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning 50% or more of the product needs to be whole grain. When determining if an item is whole grain-rich, the first word in the ingredient list needs to say *whole* or have a whole grain listed first. The white wheat bun served during the week of review was not whole-grain rich as it has enriched grains as its first ingredient.

Corrective Action Needed: Find a whole grain-rich version of the white wheat bun and submit a nutrition facts label and ingredient list. **A whole grain-rich bun is now being used for the daily chicken sandwich and hamburger on a bun. No further action required.**

3. RESOURCE MANAGEMENT

Commendations

The SFA has an Unpaid Meal Charge Policy in place and it was communicated with the households. There are not many negative lunch accounts.

Technical Assistance/Compliance Reminders

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>)

Allowable Costs

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found on the Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>). A best practice is to continue to collect on the unpaid meal charges as long as you are able to and the student is still enrolled. If unable to collect, then a transfer is required to Fund 50 from Fund 10 or another non-federal fund.
- Refer to the [Financial Q&A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>). Per question 15, student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50. Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer must be made to Fund 50.

Paid Lunch Equity (PLE)

Commendations

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. Great job running this tool!

Technical Assistance/Compliance Reminders

- USDA has not yet released the PLE tool for the 2018-19 SY. Once it is released, you will get an email through the SNT listserv.

Revenue from Nonprogram Foods

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at the school include: Adult Meals, Extra Milk, and Extra Entrees.
- On the Annual Financial Report, expenditures for nonprogram foods must be allocated for labor, food, equipment, purchased services, and other costs.
- Within the Annual Financial Report, some labor must be allocated to the Special Milk Program.
- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) 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>).

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

- Any non-reimbursable meals cannot be sold at a bundled price of \$3.40. Each item must be charged for individually and marked up to cover the cost of labor, food, and any other costs incurred. Since you are not getting reimbursement for these items, they have to be charged at a nonprogram rate. Using the [DPI Nonprogram Food Revenue Tool/Calculator](#) you can price out those items separately and charge students for them when they do not take a reimbursable meal. Otherwise, teaching the students about Offer Versus Serve will help, too.

Findings and Corrective Action

Finding #1: Nonprogram food expenditures are not being tracked.

Corrective Action Needed: Submit a statement as to how you will track these for the Annual Financial Report.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance/Compliance Reminders/Comments

- Civil Rights training needs to be completed at the beginning of the school year, annually, for all involved in the School Nutrition Programs.
- The PI 1441 form was completed correctly and done prior to the October 31 deadline. The And Justice for All poster was posted in the cafeteria next to the serving line which is a perfect spot for it.

Overt Identification

Findings and Corrective Action:

- Finding #1:** The price for a lunch shows on the computer screen indicating whether the student is free, reduced, or paid eligible.

Corrective Action Needed: Reconfigure the point of sale software to not show the price of a lunch or purchase a privacy screen for the monitor. **Submit a statement of how you will prevent overt identification on the point of sale screen.**

Local Wellness Policy

Commendations

The SFA does have a nice Wellness Policy in place. Thank you for having a wellness policy on file and working to assure students are on the path for a healthy lifestyle.

Technical Assistance: Local 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).

SFA is required to complete an assessment of the LWP:

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 the 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](#). A sample model wellness policy is available at the [USDA Wellness Policy webpage](#). 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 school's report is available at the [Wisconsin Health Atlas webpage](#). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

SFA required to inform the public of the results of the most recent assessment:

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

DPI's Team Nutrition has developed a toolkit and other resources to assist schools with building their [wellness policy](#). Schools can choose from several standardized language options in the toolkit that comply with USDA's regulations and tailor it to their school needs.

Findings and Corrective Action:

- **Finding #1:** The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](#). **Provide a timeline of when you plan to have the policy updated and compliant with the final rule.** The [Wellness Policy Builder](#) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy.

Professional Standards

Commendations

The School Food Authority is doing a wonderful job making sure staff are getting their required training hours either over summer or during the school year that pertain to their job duties.

Training Requirements

- One person needs to be deemed the "Director" of the School Nutrition Programs. This person should be the one that oversees most of the program duties and have at least 12 hours of continuing education training each school year.
- 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.

Findings and Corrective Action

- **Finding #1:** Training is not being monitored on a tracking tool. Clearly document all training information, 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).

Corrective Action Needed: Include all current training hours for each employee involved in the school nutrition programs onto the [DPI tracking tool](#) or create your own on a Google Sheet. **Submit a copy of the tracking tool with trainings entered.**

Food Safety

Findings and Corrective Action

- Finding #1:** The most recent Food Safety Inspection was not posted in a visible location of the cafeteria.

Corrective Action Needed: Post the most recent Food Safety Inspection in the cafeteria for the public to view. **Submit a statement in writing this has been completed.**

- Finding #2:** Dish machine temperatures for wash and rinse cycles are not being documented daily.

Corrective Action Needed: Begin documenting the dish machine temperatures for the wash and rinse cycles daily. **Submit a week's worth of dish machine temperature documentation.**

- Finding #3:** Staff have not signed off on the [Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployee reportingagreementsupplement.pdf).
(<https://datcp.wi.gov/Documents/foodemployee reportingagreementsupplement.pdf>)

Corrective Action Needed: Have all staff sign off on their own Employee Reporting Agreement. **Submit a statement that this has been completed.**

- Finding #4:** The Food Safety Manual needs to be printed and kept in a binder where it is accessible for all staff to use.

Corrective Action Needed: Print off the site specific Food Safety Manual you already have completed. **Submit a statement that this has been completed.**

- Finding #5:** Process 1 foods are not included in the Food Safety Manual.

Corrective Action Needed: Document the Process 1 foods (no cooking required) into the Food Safety Manual. **Submit a copy of this to the consultant.**

- Finding #6:** Standard operating procedures (SOPs) regarding the Time as a Public Health Control for TCS Food was not included in the food safety plan. SOPs are required for all applicable programs and processes occurring at the site.

Corrective Action Needed: Create or adapt an SOP (from the [SNT website](#)) to reflect *site-specific* procedures—particularly referring to Time as a Public Health Control for TCS Food. TCS food (cheese sticks, sour cream, yogurt) is removed from temperature control (mechanical refrigeration) and put onto the serving line without mechanical refrigeration. This requires a site specific SOP for the use of **Time as a Public Health Control**. Time as a public health control is used when hot or cold food is removed from temperature control for display or sale. The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold 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. Work with your local sanitarian to create/edit these 3 SOPs. **Submit a copy of the updated SOP regarding the Time as a Public Health Control to the DPI Nutrition Program Consultant via email.**

Buy American

The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, farmers, and provides healthy choices for children in the USDA School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification.

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

- ❑ **Finding #1:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List, or SFA equivalent form:
 - Grapes (Chile)
 - Canned, Mandarin Oranges (China)

Corrective Action Needed: Begin using a Non-compliant Product form for tracking non-domestic products. Provide a copy of the form that will be used and include any non-compliant products currently in the SFAs food storage areas. A [Template Form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) from DPI's Procurement webpage may be used (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Reporting and Recordkeeping

Commendations

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- Good work keeping all records regarding the school nutrition programs for 3 years plus the current school year.

Summer Food Service Program (SFSP) Outreach

Commendations

- The SFA is doing a wonderful job alerting families of open SFSP sites, towards the end of the school year. Keep up the great work!

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program

Commendations

The Special Milk Program claim was correctly submitted for December.

Technical Assistance

Per the new CACFP meal pattern, 4K students are only allowed skim or 1% white milk.

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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!