

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

School Food Authority: St. Luke Grade School

Agency Code: 567631

School(s) Reviewed: (5660) St. Luke Grade School

Review Date(s): 2/21/19-2/22/19

Date of Exit Conference: 2/22/19

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:

- 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).
- The US Department of Agriculture (USDA) 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 help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Luke School for the courtesies extended to us during the review. Staff are newer to their roles in food service and were receptive to recommendations and open to attending trainings. Reviewer suggested staff attend the August 6-8, 2019 training in Middleton and registering for the Free and Reduced-price applications and Verification course. The agency would also benefit from attending the Financial Basics course, which covers the Annual Financial Report (AFR). Thank you for all you do to serve the students in your community!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

Twenty eligibility determinations were reviewed; one error was identified, which was a correctable application error. The overall error rate is 5%, which means the agency will need to conduct an independent review of applications in SY 2019-20. Fiscal action will not be calculated.

Free and Reduced Price Meal Applications

Carryover

For up to 30 operating days into the new school year (or until a new eligibility determination is made, whichever comes first) an individual child's free or reduced price eligibility status from the previous year will continue within the same LEA. When the carryover period ends, unless the household is notified that their children are directly certified or the household submits an application that is approved, the children's meals must be claimed at the paid rate. Though encouraged to do so, the agency is not required to send a reminder or a notice of expired eligibility.

DPI SNT has an optional notification letter template that can be used to remind households of their expiring benefit (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expiring-benefits-template-letter.doc>).

- The Eligibility Manual for School Meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#em>) should be used as a guide for how to approve and process free and reduced meal eligibility determinations and conduct verification.
- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 *operating* days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined complete and unambiguous by the Determining Official (DO).
- When an application has multiple frequencies of income reported on the application, convert all types of income to annual. Use the conversions at the bottom of the Income Eligibility Guidelines (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1819.pdf>).
- The Benefit Issuance List (BI) is a list of students that qualify for free/reduced price meal or milk benefits for the current school year. This list must be updated in a timely manner, as needed, due to changes in student eligibility throughout the school year and after carryover period.
- There are four officials:
 - Determining Official (DO): Completes the initial determination and signs the back of the application. Notifies the household of the determination through application, direct certification, or other source. Cannot be the hearing or confirming official.
 - Verifying Official (VO): Completes the Verification Process and signs the back of the application(s) chosen from the pool as of October 1st. Submits the Verification Collection Report (VCR) by February 1st. Cannot be the hearing official.
 - Confirming Official (CO): Confirms the initial determination. If necessary, corrects the initial determination before reaching out to the household. Cannot be the same person as the determining official or hearing official.

- Hearing Official (HO): May be called upon to resolve a household complaint or appeal. Cannot be the same person as the Determining Official, Verifying Official, or Confirming Official.

Direct Certification

The SFA is encouraged to run direct certification prior to the first operating school day. This will certify students for free and reduced-price meal in a timely fashion and will reduce the number of households that need to submit a fee and reduced-price meal application.

Findings and Corrective Action Needed: Certification and Benefit Issuance

✓ **Finding #1:** Application error “A” as noted on the SFA-1 form.

Corrective Action: Follow-up to obtain the missing information that is required to complete the application and make a determination. If the clarification cannot be obtained, or does not support qualification for free meals, send a letter of adverse action to the household providing 10 *calendar* days to appeal. Submit a copy of the SFA-1 form with the “Date of Correction” column filled out.

Completed onsite. No further action required.

□ **Finding #2:** Households were not provided with carryover benefits in the 18-19 SY.

Corrective Action: Submit a statement summarizing the SFAs understanding of carryover and that it will be implemented, as required, moving forward. For more information, see the technical assistance above, or refer to the Eligibility Manual for School Meals (file:///C:/Users/schuljm/Desktop/1718%20eligibility-manual.pdf).

□ **Finding #3:** The agency is in need of training on the Free and Reduced-price meal determination and verification process.

Corrective Action: Review the Overview of Free/Reduced/Verification DPI webcast. Submit an email with the date of completion and who viewed the training.

□ **Finding #4:** The direct certification approval letter does not contain the correct non-discrimination statement, a place to list additional children in the household, or an explanation on how the household can notify the agency if the household does not wish to receive benefits.

Corrective Action: Update the SFAs template to include these required components, or use the DPI SNT DC Approval Letter(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter.doc>) template. The DPI templates are updated each year in May/June. Submit a statement to the consultant outlining your decision. If you will continue using your template, submit the updates.

Verification

The SFA did not have any applications on file as of October 1st. The Verification Collection Report was completed, but updated on review to remove reporting of an application received later in the year.

Meal Counting and Claiming

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

- Because teaching staff check for reimbursable meals at the point of sale (POS), they will need annual training on Offer Versus Serve (OVS) and the importance of the counting reimbursable meals as students receives it.
- Edit Check Regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made. The [daily participation/edit check form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc>) is provided for those manually consolidating claims—or without a software edit check function. School agencies are not required to use this particular form but must perform an edit check after completing the calculations shown on the bottom of the form.

Field Trip Meals

Providing meals for offsite meal consumption is at the option of the school per FNS 786-8 Rev. 1. However, not offering reimbursable meals during field trips limits meal access for students on free and reduced meal benefits. It also results in lost revenue for the food service program. Consider offering reimbursable sack lunches for field trip days. DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to assist with planning (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Findings and Corrective Action Needed: Meal Counting and Claiming

- Finding:** St. Luke School does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8.

Corrective Action Needed: Submit a copy of the February NSLP daily meal count summary (excel report) with the attendance factor calculations documented. Follow this process as outlined in the [manual edit check form](#) each month prior to claim submission.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at St. Luke Grade School documentation prior to and as requested during the on-site review. Staff was friendly and professional. The willingness to learn and make changes as needed was evident. Thank you for all you do for the students at St. Luke Grade School!

Comments/Technical Assistance/Compliance Reminders

Meal Pattern/Crediting

As a reminder, a Child Nutrition (CN) label or product formulation statement (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. A complete CN label includes the following: CN logo, product name, ingredient statement and inspection legend. It is important to save actual CN labels from product packaging that include these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label. When a CN label is not available for a processed product, that product must have a current, accurate PFS detailing product composition and crediting information in

order to be served in School Meal Programs. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

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

Offering a salad bar which includes eggs, cheese, croutons, sunflower seeds and dressing, after the point of service (POS) is discouraged. These foods must be taken into account when determining the dietary specifications for the meal (calories, saturated fat, trans fat, and sodium), but they do not contribute towards the meal pattern requirements. These items can be a significant source of calories, saturated fat, and sodium and are likely contributing excessive amounts of these nutrients. Food safety risks and cost control issues should also be considered. It is encouraged that the salad bar be moved to the beginning of the line or the POS moved to after the salad bar in order to count the salad bar offerings towards meal pattern requirements. Additionally, offering only fruits and vegetables on the salad/garden bar is strongly recommended.

During the week of review, pizza dippers and garlic bread were the planned entrée on 1/16/19. The serving size for pizza dippers was 4 sticks and when paired with the garlic bread, this resulted in 4 ounce equivalents (oz eq) of meat/meat alternate (M/MA) and 5 oz eq of grain. While there is not a limit on M/MA and grain that may be offered, staying close to the recommend weekly target maximums for grains and M/MA will help ensure that the menu is in compliance with dietary specifications of the meal pattern. It is recommended that the serving size for pizza dippers be decreased and/or the garlic bread be removed from the menu.

Fruited gelatin (1/2 cup serving size) was the only fruit planned for the day of on-site observation. This was discussed off-site and ¼ of an apple was also offered to ensure a full ½ cup of fruit was available to students. After reviewing the recipe provided, it was estimated that the ½ cup serving provided 3/8 cup of fruit. However, in order to accurately credit this recipe, the drained yield for a #10 can of mandarin oranges should be determined using the procedures outlined in the [in-house study](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

For the K-8 meal pattern, ¾ cup of vegetables must be offered daily. The planned menu for the day of on-site observation included 1 cup of romaine (crediting as ½ cup vegetable) along with salsa, tomatoes, black olives and onion all served using a spoon rather than proper portion utensil. The smallest creditable amount of vegetable is 1/8 cup, and the quantity provided using the spoon was likely closer to 1T, although difficult to determine. Therefore, in order to ensure the daily requirement was met for the vegetable component, the serving size for salsa was increased to ¼ cup (served with a 2 fl oz spoodle).

[Menu planning worksheets](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) are a great tool that can be used to ensure the planned menu meets all daily and weekly meal pattern requirements for the appropriate age group (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Portion Size

As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). The fact that spoodles, which are used to measure volume, are often referred to as a “4 oz spoodle” for example, makes this somewhat confusing. A 4 oz or ½ cup spoodle is actually 4 fl oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas). This [Basics At A](#)

Glance poster from the Institute of Child Nutrition is a helpful resource for converting spoodle sizes to volume measures (<https://theicn.org/resources/274/basics-at-a-glance/104316/basics-at-a-glance-full-poster.pdf>)

Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e., the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches children good eating habits by demonstrating and providing appropriate portion sizes of each food group at a meal. Proper portion control ensures a reimbursable meal is served, so students receive the planned quantity of the food component (e.g., two ounce equivalents of grain) or nutrients. Food costs are controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase. Note, portion sizes that are too large can sometimes discourage younger children from eating.

The practice of using heaping scoops to provide the desired amount is strongly discouraged as it is difficult to ensure consistency when not using full, level scoops. The proper scoop or spoodle size should be determined, which provides at least the minimum desired weight/volume.

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g. fruited gelatin, peanut butter sandwich, etc.). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the Standardized Recipes webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Equipment

In order to ensure that meals are planned and served in compliance with meal pattern requirements, it is essential that the necessary equipment be available. On the day of observation, at least 1.72oz of taco meat and 1 oz of tortilla chips were needed to meet the daily minimum requirements for meat/meat alternate and grain. However, the only scale available was a pound scale, making it difficult to determine the appropriate serving size. A gram or ounce scale should be purchased to aid in accurately determining servings sizes.

Additionally, the necessary serving utensils (scoops and/or spoodles) must also be available in order to serve the necessary quantity of food consistently.

Training

The Wisconsin Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. Courses such as Meal Pattern: The Whole Enchilada and Offer versus Serve (OVS) are recommended for lead workers and menu planners. Information, including dates, locations, course descriptions, class schedules and registration will be posted on the SNT Training webpage as they are scheduled (<http://dpi.wi.gov/school-nutrition/training>). This Year, SNSDC will be held in Middleton on August 6-8.

Findings and Corrective Action Needed

□ **Finding #1:** Overall, production records are being filled in fairly completely. However, there are a couple improvements that must be made. A list of production record requirements (“Must Haves and Nice to Haves”) and sample production record templates can be found on our Production Records webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). The following information was missing or recorded incorrectly on the submitted production records:

- Grade grouping(s)
- Planned/actual quantity prepared in purchase units (#10 cans, cases, pans, pounds, etc.) in addition to planned/actual number of serving prepared
- Number of reimbursable and non-reimbursable (adult meals) planned and actually served
- Serving size should reflect how it is served (ex for orange, write 1 each rather than ½ cup) and then in the component contribution section, rather than an X, indicate how the item contributes towards meal pattern requirements (for the orange, ½ cup under the fruit column). *Note: component contribution is optional but encouraged*
- Salad bar usage
 - This can be documented on the same production record or a separate salad bar record, but all items offered need to be documented individually

Corrective Action Needed: Submit one week of completed production records for lunch (including salad bar) that are in compliance with all production record requirements.

□ **Finding #2:** Production records are the documentation that all components of a reimbursable meal were offered in the minimum required amount for the age/grade group being served. There was no fruit recoded on the production record for 1/17/19, and without additional documentation that fruit was actually offered, this must be considered a missing fruit component at lunch.

As documentation is not available to show that students were offered a complete reimbursable meal, all 57 meals served on 1/17/19 will be subject to fiscal action.

Corrective Action Needed: Submit a written statement indicating your understanding of the need to offer all required components in the minimum quantities *and* document all items properly on the production records. Additionally, indicate what fruit (and portion size) would be planned with this menu if served again in the future. Production records requested in the previous finding will be reviewed for meal pattern compliance.

□ **Finding #3:** The lunch menu on 1/18/19, as served resulted a daily vegetable shortage at lunch for the K-5 meal pattern. This grade group must be offered a minimum of ¾ cup daily and the only vegetable offered was a 2.25 oz hashbrown patty crediting as ¼ cup vegetable.

Corrective Action Needed: Specify how this menu will be corrected for future service. Be specific and indicate what additional vegetable/s students will be offered along with serving sizes.

Note: as the salad bar is currently after the point of service, items offered cannot count towards meal pattern requirements. If the salad bar or POS are moved, this could correct the daily vegetable shortage. Please submit a diagram of the serving line to show any changes made.

❑ **Finding #4:** The lunch menu for the week of review (Jan 14-18, 2019), as served resulted a weekly vegetable subgroup shortage at lunch for the dark green and red/orange subgroups. The K-5 meal pattern requires that the planned menu offer at least ½ cup vegetables from the dark green subgroup and ¾ cup from the red/orange subgroup.

- Dark green vegetables offered: 1/8 cup romaine lettuce with the chicken patty sandwich on 1/17
- Red/orange vegetables offered: ½ cup carrots on 1/16, 1/8 cup tomatoes on 1/17

Corrective Action Needed: Specify how this menu will be corrected for future service. Be specific and indicate dates, vegetable substitutions/additions and serving sizes.

Note: as the salad bar is currently after the point of service, items offered cannot count towards meal pattern requirements. If the salad bar or POS are moved, this could correct the weekly vegetable subgroup shortages. Please submit a diagram of the serving line to show any changes made.

❑ **Finding #5:** Food service staff, student servers, and teachers taking POS counts at St. Luke Grade School were unclear about the OVS requirements. It is crucial that staff are well trained in recognizing a reimbursable meal under OVS. Additional training should be done as well as ongoing communication regarding the crediting of the daily menu.

As a reminder, students must select 3 different components in their daily required minimum amount, one being at least ½ cup of fruit, vegetable or combination of fruit and vegetable. Additionally, students cannot be required to select additional items if they have already selected a reimbursable meal.

The [Offer Versus Serve Guidance Manual](#) and the [Offer Versus Serve Webcasts](#) (Offer versus serve and Offer versus serve – Meal or No Meal Lesson and Game) can be used as a training resource (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf> and <https://dpi.wi.gov/school-nutrition/training/webcasts>).

Corrective Action Needed: Submit a training plan and signed roster once training has been completed for staff involved in serving and/or determining if reimbursable meals have been selected.

❑ **Finding #6:** Accurate crediting for the tortilla chips and taco meat served on the day of observation could not be determined due to lack of an ounce scale.

Corrective Action Needed: Once a new scale has been obtained, please submit the weight of a 2 fl oz spoodle of taco meat and 11 tortilla chips to confirm that daily minimum requirements were met.

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 also be subject to fiscal action. Thank you.

Please note that repeat violations involving food quantity shortages on future Administrative Reviews may result in fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance (TA)/Compliance Reminders

Annual Financial Report (AFR)

All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated by program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).

- Report USDA shipping/handling/processing fees taken out of the monthly NSLP claim as a food expense under the NSLP.
- Record the monthly gross federal reimbursement in the month it is *earned*.
- Record the annual state reimbursement in the SY it is *received*.

Allowable Costs

Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [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

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** The 17-18 SY Annual Financial Report (AFR) is not correct.
 - Revenues and expenses are not broken out by program and expense category (7 CFR 210.19). Nonprogram foods (adult meals and extra milk) must be separated from the National School Lunch Program (NSLP).
 - Total revenue must only include the meals and milk sold and must be reported as gross vs. net.
 - Commodities charges for shipping/handling/processing should be reported as an NSLP food cost.
 - Total Revenues and total expenses are incorrect
Should be:

- Revenue: \$37,186.67
- Expenses: \$34,862.91
- Ending fund balance is incorrect
Should be: \$2,323.76 *this will then be the *beginning* fund balance for the 18-19 SY AFR

Corrective Action Needed: Review the AFR webcast and manual on the DPI website. Update the 17-18 SY report. Reference the Nonprogram Food Revenue Tool Exceptions (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>) handout for guidance on how to calculate the portion of revenue and cost to pull out of NSLP for adult meals and extra milk. Report that portion under Nonprogram foods. Submit the corrected report to the consultant.

Finding #2: SFA does not have adequate internal controls to maintain oversight of federal funds.

Corrective Action Needed: Develop written internal controls to maintain oversight of federal funds and include the following: 1. Training staff on allowable expenses 2. Separation of duties 3. Policy on how to handle bad (uncollectable) debt 4. Physical controls to ensure money is not lost or stolen. Submit the plan to the consultant.

Finding #3: The SFA does not have an Unpaid Meal Charge Policy. All SFAs must have an Unpaid Meal Charge policy in place that is communicated and distributed to the households, annually.

Corrective Action Needed: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.

Finding #4: Secretarial labor is charged to the food service account without a time study or basis for the current percentage that is being allocated.

Corrective Action Needed: Submit a time study for administrative labor. Work with the consultant to determine an appropriate methodology that will more accurately reflect fluctuations in food service tasks during the school year. **If the results of the time study do not support the current percentages, the difference may need to be re-paid to food service account for last year and the current school year.**

Paid Lunch Equity (PLE)

The agency utilized the flexibility.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance (TA)/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 costs associated with nonprogram foods, 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.

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above

the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.

- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).
- Districts need to assess adult meal prices annually prior to the online contract submission to ensure student reimbursements are not being used to subsidize adult meals. The 2018-19 SY rates should be used for the 19-20 SY contract.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf)
- [Nonprogram Foods In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf)

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

Finding: Nonprogram adults (those not assisting with the direct preparation and service of food) are provided with a free lunch benefit that is paid for using food service funds.

Corrective Action Needed: Discontinue offering free adult meals to teaching staff that *do not* assist with the point of sale or direct preparation and service of the food. If the school would like to continue offering this benefit, the non-program staff meals must be tracked and a transfer made from an outside fund into food service to cover the full cost of the meal. Submit a statement to the consultant outlining how the agency will proceed.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

Nondiscrimination Statement

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

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

"And Justice for All" Poster

FNS Instruction 113 requires the nondiscrimination "And Justice for All" poster to be prominently displayed in each participating school. It must be placed in a location that enables program participants to read the text of the poster without obstruction and must be 11" x 17".

Civil Rights Self-Compliance Form

The form is required to be completed, and kept onsite, by October 31 annually.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). *Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements.* Additional information on [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>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children *without* a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. *These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable.* It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- 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 allows juice as a milk substitution and is reimbursable.** SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

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 5 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 Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action: Civil Rights

- **Finding #1:** The And Justice for All Poster is not publicly visible. It is hung inside the tray line area that closes off once meal service is complete.

Corrective Action: Submit a photo to the consultant once the poster is relocated.

- **Finding #2:** The calendar menu contains the incorrect non-discrimination statement.

Corrective Action: Update the language to the correct shortened statement, which is: "This institution is an equal opportunity provider." Submit a copy of the updated calendar menu to the consultant.

- **Finding #3:** Staff working with the school meal programs did not complete Civil Rights Training. This is an annual requirement for any staff or volunteers working with the school meal programs.

Corrective Action: Provide the [Civil Rights PowerPoint training](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx) to all staff that interact with program applicants found on the DPI website. This includes the authorized representative, food service director, determining official, verifying official, and teachers that conduct the point of sale at lunch. Submit the [sign in sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/civil-rights-training-attendance-record.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/civil-rights-training-attendance-record.doc) with the names and date(s) the training was provided.

Local Wellness Policy

Technical Assistance (TA)/Compliance Reminders

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. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy).

The following language content areas are missing from the SFA's policy:

- Policy Leadership- Identify the official responsible for the LWP oversight in the written policy
- Triennial Assessment- Include language regarding the completion
- Update/Inform the Public- The written policy must include language specifying how the SFA will be in compliance

Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available to assist in making the required updates, including a toolkit, a wellness policy builder, checklist and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

Findings and Corrective Action Needed: Local Wellness Policy

- **Finding:** SFA LWP meets some but not all requirements as stipulated above.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule.

Smart Snacks in Schools

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and

beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption.

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but this may not occur in the meal service area during meal service times.

There is no required template that must be used to track fundraisers or products sold that are subject to Smart Snacks standards. However, tracking tool templates are available on the [Smart Snacks page](#) of our website and may be helpful in tracking this information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). Locations where exempt fundraisers occur, must be documented to ensure compliance with the regulation.

The [Smart Snacks in a Nutshell](#) document provides a great overview and summary of the general standards, nutrient standards and allowable beverages for your reference (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).

Professional Standards

Technical Assistance (TA)/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](#) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).

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](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements

- Directors: 12 hours
- Managers: 10 hours
- Full-time 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
- Other staff working outside of food service with roles in food service: ~4 hours

Finding and Corrective Action: Professional Standards

- Finding #1:** Documentation of training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. Training is required for food service staff as well as other staff with partial food service responsibilities (Authorized Representative, claim preparer, teachers who conduct the point of sale and students helping with meal service).

Corrective Action: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool. If no training has been completed, submit a plan for each individual to meet their minimum training hours. Email the template and/or plan to the consultant.

- Finding #2:** The agency has not established a food service director.

Corrective Action: Submit a statement to the consultant identifying who the food service director is for the agency. This individual must meet the minimum hiring standards and the annual training hours (12/SY.)

Water

The agency is in compliance.

Food Safety and Storage

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

Food Safety Inspections

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 Plan

- The site-specific food safety plan should include SOPs for all programs and procedures that are 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.

Food Employee Reporting Agreements

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

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

Time as Public Health Control

When using "Time as a Public Health Control:"

- The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
- Cold 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 temperature control during service, including TCS foods on garden bars and milk, all leftover TCS food must be discarded.**

Findings and Corrective Action: Food Safety

- Finding #1:** The food service manager does not have a Food Employee Reporting Agreement on file.
Corrective Action Needed: Submit a copy of the completed agreement to the consultant via email.
- Finding #2:** The agency was unable to locate documentation to support that two food safety inspections were completed in the 17-18 SY. Records were not accessible for onsite audit purposes.
Corrective Action Needed: Submit copies of the Fall, 2017 and Spring, 2018 inspection reports.
- Finding #3:** The most recent food safety inspection report was posted, but not in a publicly visible location. It is hung inside the tray line area that closes off once meal service is complete.
Corrective Action Needed: Move the most recent food safety inspection report to a location visible to public. Submit photo as an attachment to assigned DPI Nutrition Program Consultant via email.
- Finding #4:** The Time as Public Health Control sanitarian approved plan from 2014 conflicts with SOP #17 and 19 (holding and serving food under temperature control) in the SFAs food safety plan.

Corrective Action: Update your food safety plan to leave only those SOPs that apply to your operation. Follow-up with your local sanitarian and see if the plan from 2014 is still acceptable. Submit a copy of their response to the DPI consultant.

Buy American

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

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

- Labels should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, the SFA must get certification from distributor or supplier stating: "We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the [SNT Procurement webpage](http://dpi.wi.gov/school-nutrition/procurement/buy-american) (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

The following products were found without a clear country of origin indicated on the product or product packaging. This will be treated as technical assistance for the 2018-19 school year, but work with your distributor/supplier to move toward compliance.

- Pancake mix
- Heinz cream of chicken soup
- Ranch dressing
- Bay leaves
- Cinnamon
- Garlic bread

If you have additional questions regarding the Buy American provision, please contact Alex Zitske (alex.zitske@dpi.wi.gov or 608-267-9822) to discuss further and ensure that procurement, monitoring and tracking are being done properly.

Summer Food Service Program (SFSP) Outreach

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

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 on the DPI Summer Meals webpage
- 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 website (<http://www.fns.usda.gov/summerfoodrocks>)

Finding and Corrective Action: Summer Food Service Program

- Finding:** The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).

Corrective Action: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Include the method of communication and timeframe for distributing SFSP outreach materials.

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program (SMP)/Wisconsin School Day Milk Program(WSDMP)

Technical Assistance (TA)/Comments

The 2018-19 SY online contract reflected participation in only the SMP (federal milk program), however, the agency has had a paper WSDMP (state milk program) contract on file since 1990. The agency also operated and submitted an annual claim under the WSDMP in the 2017-18 SY. With turnover in staff, the online contract changes made for the 18-19 SY from WSDMP to SMP participation were done in error. This resulted in the review period and month of December claims being submitted under SMP. Meanwhile, the onsite practices continued to align with the requirements of the WSDMP. The months of August- November were not claimed under SMP, the agency missed the claiming deadlines. Since the agency has a valid WSDMP paper contract, the consultant worked with the SFA to remove participation in the SMP and update the online contract to reflect WSDMP. This means that **the agency will be able to claim for the 18-19 SY under the WSDMP for all operating months.** The January SMP claim was removed from the online system before payment was made and the December SMP claim will be repaid by the SFA to DPI SNT.

Findings and Corrective Action: SMP and WSDMP

- Finding #1:** Inaccurate point of sale. Milks counts are claimed off a daily forecast rather than participation *as the student receives the milk*. A morning forecast can still be taken, but the SFA must maintain a separate point of sale count and claim off participation *as the student receives the milk*.

Corrective Action: Discontinue this practice. Correct the point of sale system and re-train staff responsible for the point of sale. Submit an explanation of the new system, who received training, and when the new system was implemented.

❑ **Finding #2:** The online contract does not reflect participation in the correct milk break program.
Corrective Action: Update the online contract to elect participation in WSDMP. Remove participation in SMP. *Submitted on 2/28/19. Once the assigned DPI contract consultant approves the update, the corrective action will be complete.*

❑ **Finding #3:** The December SMP claim was entered in error. *January was removed from the FNS online service prior to payment.
Corrective Action Needed: Send a check to DPI Accounts Payable in the amount of \$182.63 for the December SMP claim. *Once the receipt of payment is acknowledged by DPI Accounts Payable, the corrective action will be complete.*

✓ **Finding #4:** Milk temperature logs are not kept for the office refrigerator. Milk is stored in this refrigerator until milk break.
Corrective Action: Begin taking and recording the ambient air temperature of this refrigerator to ensure milk is held under 41 °F.
Corrected onsite. No further action required.

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

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

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



With School Nutrition Programs!