

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

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**School Food Authority: Holy Trinity School**

**Agency Code: 667138**

**School(s) Reviewed: Review Date(s): March 7, 8, 2019**

**Date of Exit Conference: March 8, 2019**

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage ([dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training)).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.usda.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the director and staff at Holy Trinity School for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. Everyone was very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The director does a great job in her school hot lunch program! She is very organized, and knowledgeable in creating colorful, nutritious meals for her students. The students are able to taste test new items, and be included in making decisions for menu options. It is a very well run program!

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

#### Commendations/Comments/Technical Assistance/Compliance Reminders

All (2) Applications were reviewed, and no errors were found.

#### Free and Reduced Price Meal Applications

- 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 by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that frequency [Annual Financial Report \(AFR\)](#):
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

#### Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at [karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov) for more information and approval.

#### Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with

jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

#### Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for the application to be considered complete.

#### Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

#### Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

#### Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

#### Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

### Transferring Students

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

### Direct Certification

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

### Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ **Finding #1:** In reviewing the applications, it was found that the reverse side of the applications were blank. In talking with the director, she did not realize she needed to fill in the bottom portion of the other side of the application where it says (school to fill in). TA was given and explained about the completeness and importance of the school section to be filled in. The roles of the 4 officials was talked about as well. For Verification, if this application was selected, the Confirming official would sign and date, and also the Verification official would do the same.

**Corrective Action Needed #1:** Watch the webcast on the DPI website for "[Processing Applications](https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html)" ([https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html)). Submit an email that states the date you watched it, and two sentences that tell us you understand what a complete (front and back) application should look like. Also there is more information on the DPI website regarding the four officials, and more about application process.

### Verification

#### Commendations/Comments/Technical Assistance/Compliance Reminders

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

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

❑ **Finding:** Technical Assistance was given regarding the Calendar of Requirements to follow as to when reports are due to DPI. The Verification Report was submitted after the deadline of Nov. 15<sup>th</sup>. We discussed the importance of Verification, and went over how an application is selected and verified. The process was done correctly. Holy Trinity only has 2 applications on file. Each year one or the other is selected for the verification process. Nothing further is needed.

## **Meal Counting and Claiming**

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

### **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

#### **Commendations**

Thank you to the staff at Holy Trinity Grade School for their warm welcome and cooperation throughout the administrative review. Thank you, also, for all your questions, willingness to learn and quickly implement recommendations and required changes. It has been a pleasure working with your staff. Keep up the great work!

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

##### **Standardized recipes**

A few recipes used during the review week lacked pieces of information necessary for standardized recipes. Technical assistance was provided on-site to list all the ingredients required to make the recipe, the weight or volume of the ingredients needed, the total recipe yield, the serving size for a single portion and the correct serving utensil size for the intended portion size.

For more information, check out our resources on our [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

The following recipes should be updated to include all the required information:

- Grilled hamburger
- Garlic bread

##### **Pre-K**

The 3K and 4K students are comingled with the other age/grade groups. Holy Trinity Grade School is using the USDA comingling flexibility and is serving the K-5 meal pattern for those students. This is acceptable.

For more information please visit 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).

##### **Training**

The school nutrition director and/or the authorized representative is encouraged to attend Wisconsin Team Nutrition's Teaming Up to Increase Participation workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school

cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop) webpage ([dpi.wi.gov/school-nutrition/training/increase-participation-workshop](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop)).

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 from each site. Information, including dates and locations, will be posted on the SNT [Training](http://dpi.wi.gov/school-nutrition/training) webpage as they are scheduled (<http://dpi.wi.gov/school-nutrition/training>).

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

❑ **Finding #1:** Finding: standardized recipes missing key pieces of information.

**Corrective Action Needed:** Please, update the grilled hamburger and garlic bread recipes to include all the required information. *Completed onsite, no further corrective action required. Thank you!*

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

## **3. RESOURCE MANAGEMENT**

### **Nonprofit School Food Service Account**

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

There was no overt identification in lunch service. A ticket system is used, and when payment is made, a ticket is issued for a 5-day lunch, 10-day lunch, etc. The student brings the card to lunch, it is punched prior to picking up the tray. The director is at the end of the line to make sure it is a reimbursable meal. Holy Trinity School is currently doing some research on a computerized system for the entire school, including the lunch program.

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

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

## Paid Lunch Equity

### Commendations/Comments/Technical Assistance/Compliance Reminders

The tool was not required due to a positive balance in Fund 50, however the district decided to raise the meal prices anyway. Prices were increased by \$.05 cents for both students and adults. Technical assistance was given and explained that it is fine to raise prices even if you are not required to, but a good practice is to do the tool, that will show the math in raising prices. When uploaded into the contract, DPI is able to see if it is done correctly before the contract is approved. Even if prices are not raised, having the tool up to date is helpful for the next year when prices need to be raised.

## Indirect Costs

### Commendations/Comments/Technical Assistance/Compliance Reminders

There are no indirect costs.

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
  - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
  - Utility charges - separately metered or current usage study by the local utility company.
  - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
  - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
  - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

#### Commendations/Comments/Technical Assistance/Compliance Reminders

The Justice for All Poster is currently posted out in the cafeteria.

Civil Rights training is being done annually. Training is being tracked on the DPI tracker form.

#### Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was

updated in October 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, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

#### And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered.

#### Civil Rights Training

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

#### Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

#### Local Wellness Policy

##### Commendations/Comments/Technical Assistance/Compliance Reminders

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 a plan to improve upon the results of the assessment.

##### Findings and Corrective Action Needed: Local Wellness Policy

**❑ Finding:** The paragraph regarding Fundraising being done in the school is no longer relevant to this policy. After discussing with the Food Service Director, there currently is not any fundraising being done. The Wellness Policy that Holy Trinity School has in place, contains all necessary components that USDA requires. Nice job!

**Corrective Action Needed:** Remove the paragraph about Fundraising from your Wellness Policy. Note on the policy, that an update was made to delete this paragraph. Send a copy to the consultant at DPI who was conducting the AR.

#### Smart Snacks

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

At the time of the on-site review there were no competitive foods or beverages sold. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other



competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

## **Professional Standards**

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

Professional Standards training is actively being done at Holy Trinity School. It is however, a slow process due to the high turnover in part-time staff for Food Service. The director mentioned that the hours are low and also the wages. The director continues to be very positive in her training of staff and documenting it on the DPI tracker.

### **Professional Standards: Training Requirements**

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, 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.

## **Water**

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

Water is available at no charge to students during meal services.

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

## **Food Safety**

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

The Food Safety Plan is current and available to staff in the kitchen.

[A Flash of Food Safety](http://www.fns.usda.gov/ofs/food-safety-flashes) is a video series designed to help school nutrition professionals understand and apply safe food practices ([www.fns.usda.gov/ofs/food-safety-flashes](http://www.fns.usda.gov/ofs/food-safety-flashes)). While you're at it, visit the [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website ([www.fns.usda.gov/ofs/food-safety](http://www.fns.usda.gov/ofs/food-safety)) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

## Findings and Corrective Action Needed: Food Safety

❑ **Finding:** The current Health Inspection Report was not posted where public can view it.

**Corrective Action Needed:** Post a copy of the most current health inspection report in a place where the public can view it. It can be posted outside the school office, in the cafeteria, etc. This was done on-site. No further action needed.

## Buy American Provision

### Comments/Technical Assistance/Compliance Reminders

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

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

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

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

- i. *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
- f. **Other**- Please provide a written explanation.
  - i. *Ex. The SFA received a donation of non-domestic oranges*
  - ii. *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

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

### **Findings and Corrective Action Needed: Buy American Provision**

**❑ Finding:** Pineapple tidbits from Indonesia did not have a non-compliant tracking sheet.

**Corrective Action Needed:** Complete a non-compliant product list for the pineapple tidbits. *Completed onsite, no further corrective action required. Thank you!*

### **Reporting and Recordkeeping**

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

All Food Service records are being kept for 3 years plus the current year as per the USDA requirement.

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

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

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

##### **Summer Meals**

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

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

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

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD

Summer Food Service Program Coordinator

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

**❑ Finding:** Holy Trinity School does not prepare summer meals, and is not currently doing any summer outreach.

**Corrective Action Needed:** Technical Assistance was given on how to do the Summer Outreach. Going forward, at the end of this 18-19 school year, using the DPI website, prepare a list of where families can go to have summer meals if necessary. Add to your school newsletter that goes to families at the end of the school year in June. Provide a copy of what is sent out to families, to the DPI consultant.

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Special Milk Program (SMP)**

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

The Special Milk Program currently is using a combination of white and chocolate milks. The grade groups receiving the milk are 3K-4K,5K. The Food Service Director and teachers were not aware of CACFP meal pattern regarding the special milk program. Technical assistance was given and explained why USDA requires the CACFP pattern for younger students. The POS system for each of the classes is being done correctly.

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

**❑ Finding:** The 3K-4K-5K classes receiving morning milk are not following the CACFP regulations. The students are currently receiving white and/or chocolate milk in the morning. In the 4K class, the teachers pours milk into a cup for the student, to keep less waste. It was explained about the serving requirements from USDA for the SMP program.

**Corrective Action Needed:** If Holy Trinity chooses to continue with the Special Milk Program, you will need to follow the CACFP regulations for the 3K/4K younger students as listed below starting immediately.

The serving sizes on the meal pattern table are daily minimums to serve to students. Therefore, you may pour milk in ½-cup (4 fl oz) servings for 1-2 year olds and ¾-cup (6 fl oz) servings for 3-5 year olds, or you may serve them the 1-cup (8 fl oz) milk cartons.

The food service director should periodically observe the distribution of milk for the Special Milk Program, to be sure the POS process is correct, and the portions are correct. Submit a statement that says it is being done per CACFP regulations, and documentation is being kept. **If they choose to not continue with the program, the contract will need to be changed, re-approved, and DPI notified of the date this will take place.**

“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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (https://dpi.wi.gov/statesupt/every-child-graduate).”

