

# USDA Child Nutrition Programs Administrative Review Summary Report

---

**School Food Authority: St. Paul Ev Lutheran School**

**Agency Code: 67-7819**

**School(s) Reviewed: St. Paul Ev Lutheran Sch**

**Review Date(s): 2/21-22/17//2017**

**Date of Exit Conference: 2/22/17**

---

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 (AR) 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, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training](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 webpage [dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

## **District Appreciation/Commendations/Noteworthy Initiatives:**

Special thanks is extended to the following staff positions at St. Paul Lutheran School: Administrative Assistant and the Cook/Supervisor for the courtesies extended to us during this AR. We also thank the Financial Secretary for her time in completing the comprehensive financial review. We were especially appreciative of all the time spent to answer questions off site and for cooperatively pulling records/documentation needed for the on-site review. Staff were very receptive to recommendations and guidance. The Administrative Assistant did a good job of answering the many questions on the *USDA Off-Site Assessment Tool*. The answers were easily validated during the on-site review.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Commendations

- Meal application materials are distributed to all households with back to school information after July 1, and copies of the application provided to the preschool/daycare for distribution to their enrolled families.
- Good job of approving meal applications in a timely manner, and for keeping copies of the direct certification and paper approval eligibility notification letters.
- Efforts were made to notify households that had not reapplied for meal benefits (or been directly certified) that the household benefits would be expiring. Great!
- Good to see that you have a second reviewer of the meal applications before the official notification letter is sent to families. This helps to minimize the potential for errors.
- All meal applications were approved without error and timely! Good work!

#### Comments/Technical Assistance/Compliance Reminders

##### **Certification and Benefit Issuance**

- Direct Certification has been completed 4 times this school year but we discussed the *requirement* which is to run direct *on or before the start of the school year, at the three month, and six month timeframe.*
- When computing income for eligibility determinations do not *annualize income* unless the household (hh) has multiple pay frequencies. If the hh has a single income frequency for all jobs just add up the income frequencies and compare to that frequency on the income guidelines (chart), i.e. yearly, monthly, weekly, bi-weekly, and twice per month.
- Be reminded that all contacts made with households regarding questions on the free or reduced price meal application should be *documented*. This is particularly important when the income reported on the application is *annual*. Households should only report annual income if the income meets the criteria of *seasonal or fluctuating*. The household can either project its annual rate of income, to report as current income, or if the prior year's income provides an accurate reflection of the household's current annual rate of income, the prior year may be used as a basis to project the annual rate of income.
- We also discussed the need to *document* when an *extension of direct certification benefits* has occurred. The documentation includes who is extending the benefit. The documentation can be a copy of information from your student information system to show who is residing in the household.

#### Findings and Corrective Action Needed

**Finding:** The free and reduced price meal application distributed and on the website did not contain the correct school year (SY) parent/guardian letter-*Frequently Asked Questions about Free and Reduced Price Meals*. The 2015-16 SY letter was attached. This letter has the incorrect income chart, which as you are aware, is updated annually on July 1.

**Corrective Action Needed:** Be sure to check the website each school year for updated free and reduced price meal application and notification letter templates, <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>. Please make a few copies of the letter for the balance of the school year for distribution to any newly enrolled households. **Also write a statement of corrective action that you will check the website each summer for updated materials.**

## Verification

### Comments/Technical Assistance/Compliance Reminders

#1 - Be reminded that the role of the *Confirming Official* is only to check over the application selected for verification prior to sending out the *We Must Check Your* letter. The confirming official cannot also act in the role of the second meal application reviewer since the confirmation review should be done by a person that has not been involved in the original eligibility determination. It is suggested for next school year that the Confirming Official be the School Principal, and you keep the Financial Secretary as the second meal application reviewer.

#2 – A recommendation was made to perhaps begin the verification process a little sooner, that way the Verifying Official won't be scrambling to obtain and review income documentation on the last day of the verification – November 15. Remember, a *follow-up* contact should be made with any household that does not respond to the verification request. We highly recommended that the DPI *Tracker* form be used since it is designed to document each step of the verification process and will allow for easier completion of the *Verification Collection Report*. The form is found on the website within other *optional* verification forms (page 12), <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>.

#3 – The *Verification Collection Report* (VCR) was completed on November 16 but was not correctly completed. Corrections were needed to Sections 3, 4, and 5. We recommend that the Verifying Official use the DPI - VCR Instructions next year when completing the report. Here is the link to the instructions, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-report-instructions.docx>.

### Findings and Corrective Action Needed

**Finding:** Income information submitted by the household selected for verification was not carefully reviewed. It appears that *net vs gross* income was used to evaluate the households continuing eligibility for free meals. It also appears that the child support was received more than 1 time per month based on the bank deposit slips, thus increasing household income.

**Corrective Action Needed:** Please contact the household to discuss the errors. It is likely the meal eligibility for the student will change from free to reduced price meals. Follow up with a *formal letter* to the household describing the error. Be sure to extend the required 10-calendar day timeframe should the household choose to request a hearing to discuss the reduction in benefits. The student can continue to receive free meals during the 10-calendar timeframe and during an appeals.

**Submit a copy of the letter sent to the household and some type of documentation (screen shot) within the software to show that the benefits have been changed correctly to reduced price meals along with the date this change occurred.**

## **Meal Counting and Claiming**

### **Commendations**

Review of the software meal count report, the edit check, and enrollment/attendance information for the review period - January 2017 found no errors. Again, great job!

The meal count process is that the teacher enters meal counts in the Fast Direct software in the morning. At lunch time check lists are run for each classroom from Fast Direct and the teacher stands at the end of the serving line (point of service) to check off each student that received a reimbursable meal. After each (3 serving periods) the cook/supervisor takes each checklist and checks against the initial morning counts. Counts are adjusted as necessary. If the teacher missed a name at the check off the supervisor went into cafeteria to confirm that the student did in fact have a meal. At the end of the meal service the meal count report is again cross-checked that the counts all match. Great job!

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

- The *point of service* per the approved online contract is at the end of the serving line. Please remind ALL teachers that they should be positioned at the *end of the serving line* by the milk (not standing out in cafeteria) since the teacher is also the final check for a reimbursable meal. Currently, there is no offer vs serve, therefore students (except those with documented exceptions to the meal pattern due physical or mental impairments) must leave the serving line with all components of the meal pattern. This is still important even with offer vs serve since the regulations require schools to have point of service meal counts.
- Though only a couple of the pre-school students participate in the lunch program each day a check list should be run for these students and the teacher should check the names off at the point of service. Same recommendation is made for running off the checklist for teaching staff/other non-reimbursable meals.
- If there is a perspective student visiting the school for what is referred to as “shadowing” the meal can be recorded and claimed for reimbursement in the *paid meal* category. The student is considered a “visiting student.” However, the school fund (General Fund or other School Account) should continue to reimburse the food service program for the cost of the meal. The amount reimbursed in this case is the student meal price for the age/grade group of the student.

If you choose to continue not claiming for these meals, then the meal is considered ala carte or now called – non program food sales, and the *full cost of the meal* should be recovered, i.e. the adult meal price.

- Be reminded that the *operating days* reported on the monthly reimbursement claim is the number of meal service days, not school days. For the review period (January 2017) the correct number of days was 18, not 20 per the claim.
- During the review we had a discussion about not serving a *reimbursable meal* on a day that is referred to as an “Emmaus Meal.” Per the approved online contract, schools agree to participate in the National School Lunch Program *EVERY* day school is in session for a full

day. This is addressed in part 210.1 of the Child Nutrition Program regulations which describes how the National School Lunch Act provides cash assistance and USDA Foods through USDA to the states “to be used to assist schools in serving lunches to children **each school day.**”

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

Thank you to the food service staff for providing documentation prior to the review. The willingness to learn was apparent and appreciated. Positive attitudes and excellent customer service make for a well-run program. You are doing a great job serving the students at St. Paul’s!

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

#### **OVS:**

- Your school has chosen to not use Offer Versus Serve (OVS). OVS is not required for grades K-8, although it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, students must receive all planned menu items in their full serving size. A change to OVS may be implemented at any time. Students would then have the option to choose three of the five offered components, with one of the three being at least ½ cup fruit, vegetable, or combination of fruit and vegetable, in order to create a reimbursable meal.
- If a change to OVS occurs, it is essential that all staff involved in serving or counting reimbursable meals are properly trained in meal pattern requirements and how to determine if a meal is reimbursable under OVS. Resources were provided prior to the review as well as on-site to aid in the understanding of how OVS works in the National School Lunch Program (NSLP).

#### **Weight vs. volume:**

- Unless an item is physically weighed, the serving size should most likely be recorded on the production records and/or standardized recipe as a volume. Spoodles measure volume, so while it may be labeled a 4 oz. spoodle, this actually indicates that it holds 4 *fluid* ounces or ½ cup. It doesn’t mean that the serving provided will necessarily weigh 4 oz.
- Fruit and vegetable serving sizes should be documented as a volume measure for consistency with meal pattern requirements.

#### **Standardized recipes:**

- Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service 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 to reflect the products and practices that are used in your kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates were provided prior to the review and can be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.

- In order to properly determine how a serving of a recipe credits towards meal pattern requirements, it is necessary to accurately determine the recipe yield rather than rounding or estimating that the recipe provides 50 or 100 servings.

#### Production records:

- Currently, the production records being used do not document all of the required information. While there is not a certain template that must be used, it will be necessary to either update the current template or switch to a new production record template. A new template may help to streamline documentation and ensure that all requirements are being met. The list of production record requirements, instructions, and templates are available on our website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/production-records>.
  - If choosing to use a template from our website, either the two-grade group (K-5 and 6-8) or three-grade group (if you want to separate by serving period) may work best. Alternatively, you may choose to offer all students the same menu and portion sizes, following the K-8 meal pattern. In that case, the single grade group template would be acceptable. Following the K-8 meal pattern would further streamline your menu planning and meal service processes.

#### Pre-K:

- For the 16-17 school year, students in Pre-K participating in NSLP may be offered the K-5 meal pattern or the old *traditional food based menu planning* (TFBMP) option for 1-2yr/3-4yr olds.
- With the exception of 1-2 year olds following the TFBMP, the same milk fat variety requirements apply to all students (fat-free white, 1% white, fat-free flavored).
- *Please note that regulations for pre-k students will be changing for the 17-18 school year as the new Child and Adult Care Food Program (CACFP) meal pattern will be implemented. For more information on preschoolers in NSLP, please visit: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>.*

#### Crediting:

- When calculating crediting for items or recipes, it is important to always round down. For fruits and vegetables, round down to the nearest 1/8 cup. For grains and meat/meat alternates, round down to the nearest 0.25 ounce equivalent (oz. eq).
- Grains can be credited based on weight using Exhibit A of the USDA Food Buying Guide ([http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa\\_fbg.pdf](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf)). Alternatively, a manufacturer may provide a signed product formulation statement (PFS) that lists the grams of creditable grain in the product. This number can be divided by 16 grams per ounce equivalent to get the grain contribution for that product.
- All grains offered in school meal programs are required to be whole grain-rich. Grains that are not whole grain-rich cannot be credited toward the grain component.
- The USDA *Food Buying Guide for Child Nutrition Programs* contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods.) Foods not listed in the Food Buying Guide require further documentation (a Child Nutrition (CN) label or a product formulation statement) clearly detailing the ingredients and their creditable quantities in order to be served in Child Nutrition Programs.

### Dietary Specifications:

- Being conscious of the dietary specifications of the meal pattern, it is recommended that added butter and salt is limited as much as possible. This includes adding butter to vegetables prior to serving.
- Food products and ingredients used to prepare school lunches must contain zero grams of Trans fat per serving (less than 0.5 grams per serving) according to each product's nutrition labeling or manufacturer's specifications. If it is likely that Trans fat appearing on a label is naturally occurring, the school food authority (SFA) must request documentation from the manufacturer that reports the source of the Trans fat prior to continuing use of the product. If a label does not specify the Trans fat content of a product, the SFA must request additional information prior to continuing to serve the product. All products containing synthetic Trans fats must be discontinued immediately.

### Training:

- The 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, menu planning, and recipe analysis. Information on the dates and locations of these trainings as well as course descriptions will be posted on the SNT website at <http://dpi.wi.gov/school-nutrition/training>.
- Ongoing training is essential to staying informed of school meal requirements. It is strongly recommended that you utilize the SNT website for resources, including training webcasts that can be watched at your convenience. A list of all available training webcasts can be found at <http://dpi.wi.gov/school-nutrition/training/webcasts>.

### **Findings and Corrective Action Needed**

**Finding #1:** Standardized recipes were not developed for several menu items, or an estimated yield was used and therefore the recipe could not be accurately credited.

**Corrective Action Needed:** Please provide standardized recipes for the following:

- Broccoli/cauliflower/carrots (with butter)
- Turkey and gravy
- Mashed potatoes
- Chicken tacos
- Spanish rice
- Broccoli, cheese, rice casserole

**Finding #2:** Production Records did not include the planned number of portions for each menu item, total number of portions prepared and number of portions left over, planned portion size and actual usage for condiments, and actual milk usage by type.

**Corrective Action Needed:** Please submit one week of completed production records to show that a new or updated template is being used and meets all production record requirements outlined on the list provided.

❑ **Finding #3:** Pre-K students did not select a milk as part of their reimbursable meal (teachers assembled the trays and did not take a milk) prior to the point of service. Rather, it was indicated that they are offered a glass of 2% milk in their classroom. St. Paul's currently has no offer versus serve and pre-k students are offered a menu following the K-5 meal pattern outlined in the Healthy, Hunger Free Kids Act, so all students must be offered a variety of milk from the allowable milk types (fat-free white, 1% white, fat-free chocolate).

**Corrective Action Needed:** Please submit a written statement outlining your plan for ensuring that pre-k meals are in compliance going forward. Options could include to have them select a milk while going through the line or change to the TFBMP option. Additionally, you may choose to use OVS, however, they students would still need to have the option to select an allowable milk under OVS.

Additionally, please submit one day of production records to show milk variety offered by type.

❑ **Finding #4:** The biscuit mix used in the taco bake and the chicken nuggets served during the week of review were not WGR. Additionally, no crediting information was available for the chicken nuggets. As these items could not be credited towards the meal pattern, this resulted in the daily grain requirement not being met on Monday and Tuesday.

**Corrective Action Needed:** It was discussed that until a WGR biscuit mix can be found, 1 oz. of tortilla chips will be served with the taco bake. *Please note, that in order to credit any purchased biscuit mixed used in a recipe, a PFS would be needed to document the amount of creditable grain in the product.*

Please submit a nutrition fact label and CN label or PFS for the chicken nuggets you plan to use in place of the non-WGR product.

❑ **Finding #5:** There was a vegetable shortage on Monday during the week of review. The planned offering was  $\frac{1}{4}$  cup of beans and  $\frac{3}{4}$  cup of lettuce (crediting as  $\frac{3}{8}$  cup).

**Corrective Action Needed:** This was discussed on-site and the serving size for lettuce will be increased to 1 cup. **No further action needed.**

❑ **Finding #6:** Trans fat was found in the butter blend being used.

**Corrective Action Needed:** Please submit a label for the new butter or margarine product that you plan to use going forward.

**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 pattern for the National School Lunch Program is 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. Thank you.**



### 3. RESOURCE MANAGEMENT

#### Comments/Technical Assistance/Compliance Reminders

- REMINDER: SFAs are required to have a *local meal charge policy* in place no later than July 1, 2017. More information, resources and best practices may be found on the School Nutrition Team <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section. For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter
  - Sample robo-call script

Be sure meal charge policy includes a reference to debt collection and refunds. Refunds must be made for students that receive *Reduced Price* meal benefits when the student withdraws or leaves the school. For students in the paid meal category schools have discretion to determine if refunds will be made and at what dollar amount. Refer to page 32 in the Unpaid Meal Charge Guidance referenced above.

USDA has established four areas for compliance in the *Resource Management* area. A series of questions related to: Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, and Indirect Costs was sent to the SFA at least 4 weeks prior to the AR. Based on the answers the school triggered what is called a *Comprehensive Review*. For the school a comprehensive review was conducted in two areas: *Maintenance of the Nonprofit School Food Service Account* and in the *Revenue from Nonprogram Foods* area.

#### **Maintenance of Nonprofit School Food Service Account**

This area was triggered for a comprehensive review since the food service account fund balance exceeds three months' average operating expenses for the fiscal year 2015-16. The school will receive a letter soon from DPI to indicate the excess balance. Since this is the first year that the school will receive the excess balance letter the school will just be informed of the balance requirements and provided some suggestions for reducing the fund balance. Please make some efforts to spend down the balance to an allowable level. Thank you and continue to monitor the fund balance each year.

#### **Revenue from Nonprogram Foods**

#### Comments/Technical Assistance/Compliance Reminders

The Healthy Hunger Free Kids Act of 2010 established requirements regarding revenue from the sale of nonprogram (NP) foods (formerly referred to as *ala carte*). All revenue from the sale of NP foods must accrue to the nonprofit food service account, and revenue available to support the production of reimbursable school meals cannot subsidize the sale of nonprogram foods.

#1 - Nonprogram foods include any non-reimbursable foods and beverages purchased using funds from the nonprofit school food service account, such as adult meals, food sold outside of school

hours, or any food used for catering or vending activities. For St. Paul Lutheran School nonprogram foods/beverages include: adult meals and extra milk sales. Prior to the onsite review it was also thought that revenues and expenditures for *snack cart* foods/beverages were also being run thru the food service program. These items were purchased outside the of nonprofit school foodservice account for the SY 2015-16 so there was no need for a *full comprehensive review*. The school business manager was able to show that revenue for extra milk sales was more than sufficient to cover the cost of the milk. However, for the 2016-17 FY snack revenue and expenses are purchased thru the food service account.

During the review it was discussed that snack cart foods/beverages would require the school to complete the USDA or DPI Nonprogram Foods Revenue tool at some point this school year. Compliance for all nonprogram food/beverages is determined if the percent of total revenue generated from nonprogram food sales is equal to or greater than the percent of total food costs for nonprogram foods. USDA allows schools to use a simplified approach to determine compliance, by selecting a reference period (5 consecutive days). SFAs will separate nonprogram food costs from their program food costs for the 5 day reference period. DPI has created a tool to assist schools in meeting this requirement, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xls>. The DPI tool can also assist SFAs in pricing nonprogram foods and calculating total nonprogram food expenses and revenues and total program expenses and revenues for the designated reference period. This data then pulls into the USDA *Nonprogram Food Revenue Tool* comparing revenue and food cost ratios to measure compliance.

The decision was made during the AR that the revenues from the sale of foods and beverages to date would be removed from the food service program account and run thru another school account which would mean the nonprogram food revenue tool is not required. The school is aware that the items sold must be Smart Snacks compliant (to be addressed in a separate section of this review report).

#2 - We discussed for the 2016-17 FY annual food service program financial report that **Student Meal Account Payments (Paid and Reduced-Price)** are only considered revenues when the meal is “sold”. Refer to the DPI instructions for completing the annual food service program financial report, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>.

#3 - When the food service program financial report is completed for the 2016-17 FY you will need to determine the average cost of adult meals to pull both the revenue and expense from the lunch program to the nonprogram food category. Refer to the Nonprogram Food Revenue Tool Nutshell for information on calculating adult meal cost and labor costs for adult meals, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.

### **Findings and Corrective Action Needed**

**Finding/Corrective Action Needed:** Prior to the onsite AR, the *adult meal price* was confirmed to be \$3.65 vs the \$3.80 per the approved online contract and USDA regulations regarding pricing for adult meals. Because adult meals are not reimbursable and are now considered nonprogram foods the cost of the meal must be covered. The price was increased before the onsite AR and the school could show documentation within the meal counting software that the price had been appropriately increased. Thank you! **No further corrective action is required.** The *WI Adult Meal Pricing Guide* is found on the website, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin->

[adult-meal-pricing-guide.doc](#). Please be sure to use this guide when determining the adult meal price each school year.

#### **4. GENERAL PROGRAM COMPLIANCE**

##### **Civil Rights**

##### **Commendations**

Good efforts by the Lunch Administrator to protect the anonymity or confidentiality of students eligible for free and reduced price meals.

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

##### **Special Dietary Needs**

Until recently regulations only *required* schools to offer meal accommodations if a licensed medical professional provided documentation to establish that the student has a *disability*. Recent passage of the American with Disabilities Amendments Act (ADA), considers most physical and mental impairments to constitute a disability. So rather than focus on whether or not the student has a disability, schools should now focus on ensuring equal opportunity to participate in the meal programs. Refer to this USDA policy memo, <http://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs>.

If accommodations are made without out medical statement, the student must be offered all meal pattern components and select at least three (this includes selection of at least ½ cup fruit or vegetable); this assumes the school has offer vs serve. New medical statements are not required each year, but we encourage schools to check with families annually to see if the accommodations are still required and to document this. DPI has updated the *Dietary Request* form to meet modified requirements regarding accommodations for students with special dietary needs since medical authorities no longer need to check a box to indicate if the child’s medical condition is a “disability.” The form will still require the medical authority to indicate the following: types of foods to be avoided, a list of foods to be substituted, and require a description of the modifications needed to accommodate the child’s needs. If the form is completed by a medical authority the school will be required to meet the student’s dietary needs/meal accommodations. The school should replace the form that is currently used and/or if posted to your website with the new form.

We recommend that you provide information regarding this change in upcoming communications with households and/or annually with back to school information. The form and DPI Q/A can be found on the website, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>, and <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/q-and-a-sp-59-2016.pdf>.

##### **Findings and Corrective Action Needed**

**Finding:** The January menu contained an incorrect non-discrimination statement.

**Corrective Action Needed:** 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,**” so that it can be printed in the same size font as the other printing in the document.

**For corrective action please write a brief statement of your understanding of this requirement, and submit a copy of a future menu with the corrected statement.**

## **Smart Snacks**

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

All foods (vending machines, a la carte, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the Smart Snacks rule that went into effect on July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>. Please note that all food sold on the snack cart are subject to the Smart Snack standards and therefore should be run through the product calculator and documentation of product compliance should be kept on file.

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. Exempt fundraisers cannot exceed two consecutive weeks in length and cannot occur in the meal service area during meal time. One exempt fundraiser has occurred this school year. Great job keeping a tracking form to document this fundraiser!

### **Findings and Corrective Action Needed**

**Finding #1:** Two items reviewed from the snack cart were not in compliance with Smart Snacks standards. The Rice Krispy treats did not list a whole grain as the first ingredient. The lemonade drink mix is not considered a beverage unless sold bundled with a bottle of water, in which case it would be considered a low-calorie beverage, but is only allowable at the high school level.

**Corrective Action Needed:** Please submit a written statement regarding your plans to discontinue the sale of these items and the timeframe in which that will occur.

## **Local Wellness Policy Summary for Administrative Review**

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities to begin developing a revised local school wellness policy during School Year 2016-2017 and *full compliance with the requirements of the final rule by June 30, 2017.*

Language should be added to school wellness policies to permit participation by the general public and the school community including parents, students, and representatives of the school food

authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

### Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for School Meal Nutrition Standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

[http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>.

Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

DPI has created a *Local Wellness Policy Checklist* which was used to compare the district's current policy against the WP regulation/requirements. The checklist will be sent as a separate attachment with this review report. Please consider these recommendations for additional update of the school policy before June 30, 2017.

### **Professional Standards (PS)**

The Healthy Hunger-Free Kids Act of 2010 amended 7 CFR Parts 210 and 235 of the regulations to institute hiring standards for the selection of State and local school nutrition program directors and requires *all personnel* in the school nutrition programs to complete annual continuing education/training. These regulations are expected to result in consistent, national professional standards that strengthen the ability of school nutrition professionals and staff to perform their duties effectively and efficiently. These regulations took effect July 1, 2015.

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

Staff at the school were not fully aware of this new regulation and the requirement to document training for each staff member until the AR took place. We appreciate the efforts made to use the DPI tracker tool to at least document training for the 2016-17 SY. NOTE: Any form to track trainings can be used, but must include employee name, date of training, topic and any subtopic of instruction, source of instruction, format, and number of hours of training obtained. Since DPI has allowed schools two years to complete the training requirements, and the 2016-17 SY is the second year of this first PS cycle, please do the best you can to obtain the required hours for each staff person for this cycle. July 1, 2017 will start the second-two year cycle.

It was decided during the review that it might be more appropriate for the cook/supervisor to meet the training requirements for the *Full-Time School Nutrition Program Staff* instead of the *School Nutrition Program Manager* training requirements. The latter is typically intended for public school districts that have site level managers. This is however a local decision.

## **Food Safety, Storage and Buy American**

### **Food Safety**

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

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

- Please create a template form to record daily dishmachine temperatures for the wash and rinse cycle since your dishmachine uses heat to sanitize dishes and utensils. The form should have a column for the date, a column to record the wash temperature, a column to record the rinse temperature, and a column to record the initials of the person recording the temperatures.
- On the day of the AR the dishmachine rinse temperature did not reach 180° F. until the very end of the rinse cycle. When there are gaps in time running racks of dirty dishes thru the dishmachine, this can cause the booster heater to reduce the rinse temperature. Try running a few racks of empty dishes thru the machine to see if the temperature reaches the required 180°. If it does not, please contact a repair person or try raising the temperature of the booster heater.
- Please plan to purchase some *food grade* food storage containers for storing leftover food items. Cottage cheese and sour cream containers, etc. are single use containers and not intended for reuse. These containers are porous and cannot be properly sanitized.
- Students wash tables between each serving period and at the end of the meal periods. Staff were encouraged to replace the cleaning solution after each period. We also recommend that the food service staff rewash tables before the meal service periods each day since the cafeteria is a multi-purpose room.

NOTE: Feel free to discuss these comments with your health inspector at the time of your next food safety inspection.

## **Findings and Corrective Action Needed**

**#1 - Finding/Corrective Action Needed:** Food safety inspection reports are required to be posted in public view. The food service supervisor at the school did not know that the *most recent inspection* report needed to be publicly posted. The report was posted during the review. **No further corrective action is requested. Thank you.**

**#2 – Finding/Corrective Action Needed:** The food safety (fs) plan at the school was reviewed and was in need of updating. The plan begins with a categorization of foods into Process 1, 2, or 3 depending on the amount and type of preparation at the school. Please work to update or create your *categorization list*. Based on the processes chosen, Standard Operating Procedures (SOP) are selected. Be sure to read thru each SOP and as needed check applicable boxes. Please refer to our website for the most current DPI FS Plan template, [https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp\\_may14\\_1.doc](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp_may14_1.doc). **For corrective action please develop and submit a written timeline for update of your school’s food safety plan. If you have questions about the plan be sure to ask the health inspector when you have your spring inspection.**

Food service staff need to sign the *Food Safety Reporting Agreements* at least one time, upon hire. Best practice is to review the document with staff and have them sign annually. Keep copies of the forms with your food safety plan.

## **Buy American**

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

Regulations took effect with the start of the 2016-17 SY for the *Buy American provision*. This provision requires SFAs to purchase, to the maximum extent practicable, *domestic agricultural commodities or commercial food products*. “Domestic Commodity or Product” are defined as an agricultural commodity that is produced in the United States and a food product that is processed in the United States using substantial agricultural commodities that are produced in the United States. “Substantial” means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowed under this provision as territories of the United States.

The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs. 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. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

The AR requires the State Agency to assess compliance by checking 1-2 items in a variety of food categories.

The following items were found to be non-compliant:

*Grapes from Chile, Cauliflower - product of Mexico, Mandarin Oranges from Thailand, and Vegetable Oil from Canada.*

Recommendations for compliance:

-Some products will not be grown domestically, such as pineapple and mandarin oranges. The food service staff should be checking with their food vendors to see if these products are available domestically. If they are not, document on the Non-compliant Product List, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>.

Other possible reasons for not purchasing domestically includes: cost, seasonality, availability, and substitution.

-If ordering online check with vendor to see if there is a link for determining the origin of the product.

-Bid documents should also include Buy American language.

Note: The use of the non-compliant product list is the exception, not the rule. I encourage the food service supervisor to read what is posted about Buy American on the website, <http://dpi.wi.gov/school-nutrition/procurement/buy-american>. She might also read thru the USDA memo, SP24-2016, <http://www.fns.usda.gov/sites/default/files/cn/SP24-2016os.pdf>.

If there are additional questions about Buy American the food service supervisor should ask them of our procurement staff during the upcoming procurement review.

## **Reporting and Recordkeeping**

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

USDA requires food service records to be kept for 3 years plus the current year, or 3 years after the final claim for reimbursement for the fiscal year or until audit resolution of any audits.

## **Summer Food Service Program Outreach (SFSP)**

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

- 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 St. Paul Lutheran School USDA still requires that all SFAs 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 website**
  - 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>

Near the end of this school year information about the SFSP can be a simple paragraph in the school newsletter or an email sent home to parents, or by putting up free posters and/or mail these items free of charge. For more information on the SFSP contact:

Amy J. Kolano, RD, CD  
Summer Food Service Program Coordinator  
Phone: 608.266.7124  
e-mail: amy.kolano@dpi.wi.gov

---

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage [dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017).

