

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

School Food Authority: Martin Luther School

Agency Code: 70-7189

School(s) Reviewed: Martin Luther School

Review Date(s): February 20-21, 2019

Date of Exit Conference: 2/21/19

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:

- 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. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, 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](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, 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).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Martin Luther School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. Everyone was very friendly, helpful, and 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.

Thank you to the Food Service Director for staying after hours to make sure everything was taken care of for the review. The DPI review team appreciates the eagerness of the Food Service Director, Principal, and staff for their willingness to make changes to meet School Nutrition Program regulations.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

The total number of eligibility determinations reviewed was 7. Of those determinations, there were 0 errors. There were no applications submitted for the 18-19 SY.

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.

Carryover

Carryover of meal benefits from the prior school year is allowable until the 30th operating day in the school year unless a Free and Reduced Meal Application has been submitted (approved or denied) or the student was coded on Direct Certification for any code except an N code. In those cases, carryover stops when a new meal determination has been made.

Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available.
- SFAs must annually distribute the Public Release to three of the following places:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need such as laundromats, social service agencies, libraries, grocery stores, WIC offices, food pantries, senior centers, physician offices/clinics, Community Action Program Agencies)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed. You may request the public release to be published as a public service.

Direct Certification

- As a reminder, you are required to run direct certification with the full enrollment for the entire School Food Authority (SFA) a minimum of four times a year: at or near the beginning of the school year, three months after the initial run, six months after the initial run, and in March.
- A best practice is to run Direct Certification monthly and when a new student transfers into the district.
- Direct Certification (DC) was run on 8/17/18, 9/28/18, and 1/17/19.

- The effective eligibility date for a DC eligible student is the date of the original output file of the day that Direct Certification was completed.

Transferring Students

- When a child transfers in to the school midyear, the Determining Official (DO) can request documentation to support the child’s benefit status from the former school or the household can provide it.
- Appropriate documentation would be a copy of the approved application or a copy of the Direct Certification output match file which shows the DC code he/she matched to.
- If you receive a copy of the approved application determined at the prior school, the Determining Official must re-determine the application, sign, and date it. A notification of eligibility letter must go out to the household notifying the benefit and start date of eligibility.
- The start date of eligibility is the date the DO re-determined the application.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).
- The household can “self-disclose” by bringing in a copy of their free/reduced approval notice or direct certification approval letter to the designated official operating the outside program. This option removes food service from these types of requests and is preferred. DPI recommends limiting the number of staff members responsible for collecting this data (e.g., one school secretary who has been trained on confidentiality, rather than each athletic coach).

Verification

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

- There were no applications submitted during the 18-19 SY, therefore Verification was not required.
- For more information about Verification, please review the [Verification webinar](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html).
- The Verification Collection Report (VCR) was completed incorrectly. This was corrected on-site. Please review the [instructions](#) on how to complete the VCR (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/verification-report-instructions.pdf>).

Meal Counting and Claiming

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

- No errors were found on the monthly claim for reimbursement for the NSLP.

- Observing lunch service, it was noted that the flow of service could be changed to allow the students to take milk first, then fruit, vegetables, grain, and lastly the entrée. This would allow the school nutrition professional to check trays for reimbursable meals. Teachers would not need to check trays for reimbursable meals.

Visiting Students

- School age students visiting for lunch, may take a reimbursable meal, be charged the student lunch price, and be claimed in the paid category. Keep documentation to support they took a reimbursable meal.
- If you prefer to charge the visiting student for the meal and not claim them, they do not have to take a reimbursable meal, but must be charged the adult meal price or at least charged enough to cover all costs for their items.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff at Martin Luther 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.

Comments/Technical Assistance/Compliance Reminders

Week of Review - January 7-11, 2019

- Daily vegetable shortage on Monday. Only $\frac{5}{8}$ cup vegetable offered when $\frac{3}{4}$ cup is required.
- Daily meat/meat alternate (m/ma) shortage on Monday. Per the crediting of the chili recipe, only 0.75 oz eq m/ma offered per serving.
- Weekly m/ma shortage. Over the course of the week only 7 oz eq m/ma were offered instead of the required 9 oz eq m/ma.
- Weekly grain shortage. 7.5 oz eq grains were offered instead of the required 8 oz eq grains.
- Only 30% of the grains offered over the course of the week were whole grain rich.

Standardized Recipes

Use of standardized recipes is another important part of USDA School Meals Programs. Any menu item that has more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used.

This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Continue to use the resources on our website regarding recipe standardization. These include a [Standardized Recipe Checklist](#) for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the [Standardized Recipes](#) webpage. We also encourage viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>; <https://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

A few recipes used during the review week lacked pieces of information necessary for standardized recipes. Technical assistance was provided on-site to include all ingredients apart of the recipe, detailed

instructions (including any equipment needed to prepare the menu item), serving size for a single portion and the total recipe yield.

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

- PBJ sandwich
- Ryan's Cornbread
- Turkey and cheese sub sandwich
- Grammy Carol's Chili
- Buttered noodles

Crediting of recipes

SFAs are required to document how foods offered credit towards weekly meal pattern requirements.

The [USDA Food Buying Guide for Child Nutrition Programs](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on "food items search" and type in a specific food in the "keywords" search box. Many different options may appear. Find the one that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>).

Most fruits and vegetables credit by volume served (e.g., ½ cup peaches will credit ½ cup fruit) and the FBG will note if the crediting is different based on volume served (e.g., one medium banana credits ½ cup fruit). Most meat/meat alternates and grains credit by weight (i.e., 2 ounces of cooked, plain chicken breast credit 2.0 oz eq meat/meat alternate; 1 ounce brown rice credits 1.0 oz eq grain). If the product is not listed in the FBG, additional crediting documentation is required.

Any processed product that is not listed in the *USDA Food Buying Guide for Child Nutrition Programs* requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to credit toward the meal pattern. A complete PFS must come directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).

If a processed item does not have a valid CN label or PFS and cannot be found in the *USDA Food Buying Guide for Child Nutrition Programs*, it may not be credited when served as part of the USDA School Meal Programs. Additionally, remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. 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>).

Reference the [Tips for Accepting Processed Product Documentation PDF](#) on the Menu Planning webpage for steps to verifying the accuracy of information on a PFS (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/tipsheet_processedproduct.pdf).

Production Records

Be sure to include everything that is planned and served as part of a reimbursable meal. This is your proof that reimbursable meals were served.

- Meal Pattern used
- If you are using a recipe to prepare a menu item, then only the recipe name is needed on production records (the ingredients do not need to be listed out on the production records).
- Planned serving sizes - be clear
 - Fish sticks, instead of writing 2oz as the serving sizes write 4 sticks.
 - If going to use spoodles, it would be nice to denote that a spoodle was used. Otherwise if the serving size is listed as 2oz, reviewers believe that 2 oz by weight was used, rather than a spoodle.

It was great to see the food service director include menu planning worksheets with the meal pattern documentation that was submitted, however, sometimes food items that were listed on the worksheets were not included on the production records. Menu planning worksheets are excellent tools to help the menu planner plan the week appropriately, however, the production records are what reviewers use as proof as what was actually served. Therefore, be sure to include everything that was listed on the menu planning worksheets on the production records.

Alternate Meals - Peanut Butter and Jelly Sandwich

All alternate meal choices must be included on production records. Because students are only able to select one entrée option, each entrée option offered is viewed as one “line” and therefore needs to meet the daily as well as the weekly requirements of the meal pattern, including vegetable subgroups.

Menu Planning Worksheets

It was great to see that the food service director was using the menu planning worksheets! Additionally, it was noted that an outdated menu planning worksheet was being used. Please use this updated [worksheet for K-8](#), which has a column to calculate the totals for the week. Remember to write down everything intended to be served with the reimbursable meal.

Vegetable Subgroups

It was noted that green peas were frequently credited towards the beans, peas (legumes) vegetable subgroup. However, due to the nutritional content of this vegetable it is actually considered a starchy vegetable.

Whole Grain-Rich

All grains offered and credited in school meal programs are required to be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. Replace the following enriched grain products with whole grain-rich versions.

- Cornbread
- Sandwich bread
- Sub bun

USDA has a very thorough [Whole Grain Resource](https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

Whole grain exemption

If the SFA can demonstrate a hardship in procuring, preparing or serving a compliant WGR product that is accepted by students, an exemption can be requested for that specific product. Review the August 28, 2018 memo, "[School Meal Flexibilities for School Year \(SY\) 2018-19](#)" for more information on the exemption process. Note that until an exemption approval has been received, WGR products must continue to be served.

Signage

Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage was posted but did not include how students could select a meal under Offer versus Serve. Signage examples can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Printed Menu

The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal. The food service director completed this onsite. Thank you!

Field trips

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way to collect meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding #1:** Multiple meal pattern violations for the week of review (January 7-11, 2019).
- Daily vegetable shortage on Monday. Only ⅝ cup vegetable offered when ¾ cup is required.
 - Daily meat/meat alternate (m/ma) shortage on Monday. Per the crediting of the chili recipe, only 0.75 oz eq m/ma offered per serving.
 - Weekly m/ma shortage. Over the course of the week only 7 oz eq m/ma were offered instead of the required 9 oz eq m/ma.
 - Weekly grain shortage. 7.5 oz eq grains were offered instead of the required 8 oz eq grains.

Corrective Action Needed: Submit a statement explaining how the daily vegetable shortage, daily meat/meat alternate shortage, weekly meat/meat alternate shortage and weekly grain shortage will be fixed for the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.

❑ **Finding #2:** Standardized recipes need to be updated to include all required pieces of information.

Corrective Action Needed: Submit a standardized recipe for the following menu items. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the [Standardized Recipes webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

- PBJ sandwich
- Ryan’s Cornbread
- Turkey and cheese sub sandwich
- Grammy Carol’s Chili
- Buttered noodles

❑ **Finding #3:** Production records not complete.

Corrective Action Needed: Submit one week of completed production records. Be sure that planned serving sizes are clear.

❑ **Finding #4:** The cornbread, sandwich bread and sub buns served during the week of review were not whole grain-rich.

Corrective Action Needed: Find new, whole grain-rich versions of the above mentioned products and submit nutrition facts labels, ingredient lists and recipes, if applicable. If you choose to submit a whole grain exemption request, please let the public health nutritionist know.

❑ **Finding #5:** Reimbursable signage not posted at the beginning of the line.

Corrective Action Needed: Post signage near the beginning of the service line that explains how students may select a reimbursable meal with Offer versus Serve. *Completed onsite no further corrective action is 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

Commendations/Comments/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 into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. 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).

- Refer to the webcast explaining the [Annual Financial Report](https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story_html5.html).
- Any milk sold to students that is not being claimed for reimbursement, must be recorded as a Nonprogram Food revenue on the Annual Financial Report. This is only if the milk is being paid for by the food service account.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchased Services” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “nonprogram foods”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
 - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP purchased service for public schools.

Allowable Costs

- Bad debt from unpaid student lunch accounts is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (https://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
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf).

Revenue from Nonprogram Foods

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

- Nonprogram foods include: Adult Meals and Extra Milk (for cold lunch or the milk break).
- If students would like to take extra fruit and vegetables, you do not need to charge them for these. However, if you see an excessive amount of these items being taken, you could potentially be losing money and should charge for extras.
- Giving away food without charging for it is unallowable.
- If you want to allow the students to take extra entrées, or any extra sides, they must be charged. You can calculate the raw food cost for these items and plug them into the [DPI Nonprogram Food Price Calculator Tool](#) to determine what you should price them out as. The [Menu Raw Food Costing Tool](#) can be used to price out a week's worth of entrées to get the raw food cost. Plug the average raw food cost from this tool into the DPI Nonprogram Food Price Calculator Tool.
- 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.
- The USDA Nonprogram Revenue Tool (the formula shown below) must be completed annually, at a minimum, to ensure all costs of Nonprogram foods are being covered.

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

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, at a minimum, SFAs must 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).

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)

Indirect Costs

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

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:

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

Findings and Corrective Action Needed: Resource Management

- **Finding #1:** There is no Unpaid Meal Charge Policy on file.

Corrective Action Needed: Create an Unpaid Meal Charge Policy and submit a copy to the consultant for review.

- **Finding #2:** The Adult Meal price does not meet the minimum price requirement. Currently, it is \$3.50, but since the student lunch is \$2.90, it should be ~\$0.65 more than the student price, at \$3.55.

Corrective Action Needed: Update the Adult lunch price on the Online Contract. Corrected on-site. No further action required.

- **Finding #3:** Teachers and staff are being charged a lesser amount for lunch, \$3.40, than what is required, \$3.55.

Corrective Action Needed: Begin charging the teachers and staff the \$3.55 price. Submit a statement this has been implemented.

- **Finding #4:** Nonprogram food revenues and expenses are not being tracked on the Annual Financial Report. Nonprogram foods include adult meals, extra milk, milk break milk, cold lunch milk, and extra entrées.

Corrective Action Needed: Track all nonprogram food revenues and expenses. By signing this report you agree to track these and report them on the Annual Financial Report each year.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

- The And Justice For All poster was posted in a publicly visible location at the review site.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

Special Dietary Needs

- If accommodating students with allergies by having a specific table to sit at, it is advised to not label it “peanut free” or “allergen free”. Instead, label it “allergen aware” or “peanut aware” as you may not be able to guarantee the table(s) are free from any allergens at all times of the day. The school(s) should have special procedures for 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>).

Findings and Corrective Action Needed: Civil Rights

- Finding #1:** The lunch menu does not have the correct shortened USDA non-discrimination statement on them.

Corrective Action Needed: Update the menus to have the full USDA non-discrimination statement.
Updated on-site. No further action required.

Local Wellness Policy

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

Martin Luther School has an excellent Local Wellness Policy in place. Technical assistance was provided on-site regarding documenting the measurable goals for Nutrition Education, Nutrition Promotion, Physical Activity, and Other School-Based Wellness Strategies.

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

Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

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

Content of the Wellness Policy

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

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

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Smart Snacks in Schools

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

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

Buy American

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

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product. A “Domestic Commodity or Product” is defined as an agricultural commodity or product that is produced or processed in the United States using substantial agricultural commodities that are produced in the United States (products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States).

“Substantial” means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. 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.

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) (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed: Buy American Provision

❑ Finding #1: Refrigerated grape tomatoes (Mexico) not included in non-compliant product list.

Corrective Action Needed: complete a non-compliant product list for the refrigerated grape tomatoes. *Completed onsite, no further corrective action required. thank you!*

Professional Standards

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

Professional Standards: New Food Service Director Hiring Requirements

- 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).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A [template tracking tool](#) is posted to our [Professional Standards](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- USDA allows a flexibility to complete the total training

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action Needed: Professional Standards

- Finding #1:** Trainings are occurring but not being tracked on a spreadsheet.

Corrective Action Needed: Use the [DPI tracking tool](#) to track trainings. **Submit a copy of a completed tracking tool.**

- Finding #2:** Food Service Director does not have ServSafe certification.

Corrective Action Needed: Submit a statement for when the Food Service Director will complete this certification class.

Food Safety and Storage

Commendations

- The Food Safety Manual was available for review and had all required information. The temperature logs, calibration logs, and sanitizing solution logs were documented well and organized nicely.

Technical Assistance

- 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.
- Any food that is a TCS food must be kept under refrigeration or hot held (depending on the food). If not, it must be discarded after meal service.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products

Shell eggs

Meat (beef, pork, and lamb)
Poultry
Fish
Shellfish and crustaceans
Baked potatoes
Heat-treated plant food, such as cooked rice,
beans, and vegetables
Tofu or other soy protein

Sprouts and seed sprouts
Sliced melons
Cut tomatoes
Cut leafy greens
Untreated garlic-and-oil mixtures
Synthetic ingredients, such as textured soy
protein in meat alternatives

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.
 - 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 mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** The most recent food safety inspection was not posted in a public location.

Corrective Action Needed: Post the most recent food safety inspection in a public location. **Corrected on-site. No further action required.**

- ❑ **Finding #2:** Milk served to students for lunch is taken out of refrigeration and put on a cart without ice packs or ice.

Corrective Action Needed: Put milk on ice or ice packs to keep milk cold. **Submit a statement this has been implemented.**

- ❑ **Finding #3:** No SOP on file for the milk.

Corrective Action Needed: Adapt an SOP for the milk using the [milk barrel SOP](#). Add this to the Food Safety manual and **submit a copy to the consultant.**

Reporting and Recordkeeping

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- Be sure to keep all documents pertaining to the School Nutrition Programs for 3 years plus the current school year. You may shred anything from the 14-15 SY and prior.

Summer Food Service Program (SFSP) Outreach

Commendations/Comments/Technical Assistance (TA)/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 Martin Luther School, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

Resources:

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

5. OTHER FEDERAL PROGRAM REVIEWS

Special Milk Program

Commendations/Comments/Technical Assistance/Compliance Reminders

- The January 2019 and December 2018 SMP claims were validated and resulted in an underclaim. You may only claim milk served to students in the half day 4K program, that do not have access to lunch (or breakfast).
- Flavored milk may not be offered within the Special Milk Program.

Findings and Corrective Action: Special Milk Program

- Finding #1:** The January 2019 and December 2018 SMP claims resulted in an overclaim. Prior months were correctly submitted.

Corrective Action Needed: Submit a statement of how you will ensure to claim the 4K student milk only.

- Finding #2:** Flavored milk is offered to students within the SMP. This is unallowable.

Corrective Action Needed: Submit a statement of how you will ensure the 4K students will only take unflavored milk.

"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>).



With School Nutrition Programs!