

# School Nutrition News

A Newsletter from the Wisconsin Department of Public Instruction, Division of Finance and Management

Vol. 6 No. 3

Spring 2014

## All Foods Sold in Schools



The Smart Snacks Interim Final Rule was released June 28, 2013, with clarifying questions and answers (Q&As) from the United States Department of Agriculture (USDA) released March 5, 2014. This rule applies to any entity participating in the National School Lunch (NSLP) and/or School Breakfast Program (SBP). Effective July 1, 2014, the rule applies to all foods being **sold** to students on the school campus during the school day. There are general and nutrition standards for entrée items, side items, and beverages. For more information on these standards, visit [http://fns.dpi.wi.gov/fns\\_cnrsnp#cf](http://fns.dpi.wi.gov/fns_cnrsnp#cf). Please note that State Agencies (SA) are prohibited from providing waivers to School Food Authorities (SFA) to allow them to delay the implementation of the Smart Snacks rule.

According to this rule, SAs are to set up the number of fundraisers that may be exempt from the rule's guidelines. The exemptions are only for those fundraisers that sell foods that do not meet the nutritional standards for the Smart Snacks Rule AND that are sold and consumed during the school day. Fundraisers using non-food items, foods that meet the new standards, and foods that are not consumed during the school day (example: frozen cookie dough) are allowable without limitations. We sent out a survey to collect feedback from school staff and parents to assist us in setting this number and received 805 completed surveys. The Department of Public Instruction (DPI) hopes to get a decision to you by the end of the present school year.



## Is Your Snack a Smart Snack?

A product calculator developed by Alliance for a Healthier Generation makes it easy for schools to determine which snack items meet the new Smart Snacks standards. To begin, go to [https://schools.healthiergeneration.org/focus\\_areas/snacks\\_and\\_beverages](https://schools.healthiergeneration.org/focus_areas/snacks_and_beverages). After answering the questions, the calculator will tell you whether or not the snack item is compliant. The USDA has determined this calculator to be accurate in assessing compliance so we recommend printing the results and keeping them on file.

## 2014 Standing Up for Rural Wisconsin Award

Congratulations to Northland Pines School District for receiving a "Standing Up for Rural Wisconsin Schools, Libraries, and Communities" award!

Robin Indermuehle, science teacher at Northland Pines High School, developed Growing Your Own Food in the 21st Century as a project-based class to teach students how to garden and give them a new life skill. She partnered with Mary Ann Lambrecht, Vilas County Master Gardener volunteer, and Debbie Jircik, co-founder of the Seed to Seed Edible Garden Project, to expose the students to science-based gardening concepts.

Started in school year (SY) 2010-11, Growing Your Own Food in the 21st Century now involves three garden sites: the school attached green house, four plots at the community garden, and the hoop house behind the community garden.

During the winter months, students plant and tend seedlings in the hoop house and in the spring the young plants are sold to raise funds for the garden or are planted in the community garden plots. Students decide the types of plants, which include many types of greens, tomatoes, peas, green beans, and more. The harvest becomes in-class "Salad Day Fridays." Students also share their crops with the school food service, and a chef comes in and uses it in special featured recipes.



Pictured, from left to right: Mary Ann Lambrecht, Master Gardener; Robin Indermuehle, Science Teacher; Tony Evers, State Superintendent; Jim Brewer, Principal; Julie Cox, School Nutrition Team Assistant Director.

# School Nutrition Skills Development Courses

With SY 2013-14 winding down, it's time to start thinking about summer training opportunities. Every year, the School Nutrition Team (SNT) offers School Nutrition Skills Development Courses (SNSDC) at different locations throughout Wisconsin. Mark your calendars for these free trainings geared toward both food service personnel and administrative staff!

SNSDC Location	Date
<b>Wausau:</b> Northcentral Technical College	June 24-26
<b>Rhineland:</b> Nicolet Technical College	July 8-10
<b>Oshkosh:</b> Fox Valley Technical College	July 15-17
<b>La Crosse:</b> Viterbo University	July 22-24
<b>Milwaukee:</b> Milwaukee Area Technical College – Oak Creek Campus	July 29-31
<b>Madison:</b> The DPI	
<b>Madison:</b> The DPI	August 5-7

At each site, we will offer administrative courses such as child nutrition program basics, free and reduced eligibility, verification, and financial basics. We will also offer courses for food service staff on the breakfast meal pattern, lunch meal pattern, and menu planning tools. A Public Health Nutritionist and/or a Nutrition Program Consultant will be holding “office hours” at least one time at each site. You will be able to come and go as you please during the four hours that we offer this technical assistance opportunity. Bring your recipes, menus, forms, and any other questions to our office hours for individualized help.

For those who feel well-versed in our previous course offerings, keep an eye out for the new classes we have developed. This year, we'll be adding courses on local procurement with a Farm to School (F2S) emphasis and on expanding your programming to include additional programs like the Special Milk Program, Afterschool Snack Program, and Breakfast in the Classroom. Additional classes and descriptions will be found on our training webpage at [http://fns.dpi.wi.gov/fns\\_snt\\_training](http://fns.dpi.wi.gov/fns_snt_training). Registration for these classes will be handled online through RegOnline at <https://www.regonline.com/snsdc2014>.

## Certificates of Attendance for Watching Webcasts

Did you know the SNT has over 30 webcasts available for viewing on our training web page? At your convenience, you can refresh yourself on the lunch meal pattern, learn what to

expect for your upcoming administrative review, or see if the Community Eligibility Provision (CEP) is an option for your SFA. When you watch individual webcasts that are at least 60 minutes long, you can complete a “Certificate of Attendance Request Form” in order to track your training hours for the School Nutrition Association (SNA). The form can be found at <http://fns.dpi.wi.gov/files/fns/doc/6058.doc>. The completed form should be submitted by email to Molly Gregory at [molly.gregory@dpi.wi.gov](mailto:molly.gregory@dpi.wi.gov) or faxed to Molly at 608-267-0363. After your request has been successfully processed, a certificate will be sent to you.

Please note that webcasts must each be at least 60 minutes long in order to receive continuing education credit. We are not able to grant certificates of attendance for shorter webinars that are bundled together in order to meet the 60 minute minimum.



## Small Victories (SV) Fall Training

After taking a spring hiatus, Small Victories (SV) training sessions will be offered again in October! Topics for the fall sessions will likely include an in depth look at the new Smart Snacks rule, an update on incorporating new wellness regulations into the school wellness policy, discussion of the feasibility of utilizing CEP in small schools, and effective production record keeping. The last topic is the result of numerous requests from food service staff that we offer additional training on recordkeeping since implementing the new meal patterns under the Healthy, Hunger-Free Kids Act of 2010 (HHFKA).

As always, anyone working in school food service is invited to attend SV sessions which focus on issues relevant to those working in small schools. Those working in small schools within large districts often find that SV trainings offer a valuable learning experience. Sessions are eligible for continuing education credits. Locations and dates for October have not yet been set but watch the mail this fall for details. If you have questions about the trainings or would like to host a SV session, please contact Loriann Knapton at [loriann.knapton@dpi.wi.gov](mailto:loriann.knapton@dpi.wi.gov) or via phone at 608-266-1046.

## Pop Quiz

Which situation is not exempt under the All Foods Sold in School: Smart Snacks Rule?

- A. Birthday treats brought into a classroom.
- B. Concessions at a 6:00pm basketball game.
- C. Vending machine items in the teacher's lounge.
- D. Products sold at a school store.

What do you think? Turn to page 11 for the answer!



## Team Nutrition Training Opportunities

Wisconsin (WI) Team Nutrition has developed a new training and grant opportunities web page that can be accessed at [http://ne.dpi.wi.gov/ne\\_tngrant](http://ne.dpi.wi.gov/ne_tngrant). Archived trainings, upcoming webinar opportunities, and available school sub-grants will be listed on this page. It will be updated routinely as new sub-grants become available and training opportunities are scheduled. Consider reviewing our two available webinars: *Taking the HealthierUS School Challenge* and *Creating Smarter Lunchrooms*.

- **Taking the HealthierUS School Challenge (HUSCC)** was recorded on February 20, 2014 and attended by over 40 food service and school personnel. The training was designed to provide WI schools with the opportunity to learn more about the HUSCC and how your school can receive national recognition and monetary prizes for your school's wellness initiatives. The training discusses HUSCC requirements, guidance for completing an application, and tips for successful completion of the materials.
- **Creating Smarter Lunchrooms** was recorded on December 18, 2013, and provides information on Smarter Lunchroom basics and how WI schools can easily implement the techniques with little to no time and funding. Did you know you can increase your students' vegetable consumption 40-70% simply by creatively naming your vegetables and displaying these names near the food? This is just one example of a Smarter Lunchroom technique. The Smarter Lunchroom Movement seeks to equip school lunchrooms with evidence-based tools that improve child eating behaviors and thus improve the health of children.

## Team Nutrition Resources

WI Team Nutrition is excited to introduce *Wisconsin Wellness: Putting Policy into Practice* and *Home Grown: School Gardens in Wisconsin*. These guides are available as electronic copies only.

- **Wisconsin Wellness: Putting Policy into Practice** is an interactive, web-based resource that is designed to assist school districts with developing comprehensive policies that incorporate new wellness policy requirements while establishing a framework for accountability. The resource provides information on the five steps that should be taken to create and maintain a strong local wellness policy. It also includes information on components that should be included in your policy and provides sample goals and objectives for each content area. You can download the resource at [http://fns.dpi.wi.gov/fns\\_wellnesspley2](http://fns.dpi.wi.gov/fns_wellnesspley2).

- **Home Grown: School Gardens in Wisconsin** shares the stories of 12 schools that started a garden during the spring of 2013. Each school shares the barriers they faced, successes they celebrated, and the nutrition education techniques that were implemented in the classrooms. Additionally, five best-practice recommendations were developed to assist other schools in starting a garden. Visit [http://fns.dpi.wi.gov/files/fns/pdf/tn\\_hmgrwn\\_wi.pdf](http://fns.dpi.wi.gov/files/fns/pdf/tn_hmgrwn_wi.pdf) to download the complete resource.

## Wisconsin School Garden Initiative



The Wisconsin School Garden Initiative is a collaborative project of Community GroundWorks, the University of Wisconsin, and other SAs. The project promotes youth gardening and garden-based education to improve the health of Wisconsin's children through trainings, resource development and technical assistance supporting gardens and garden-based education at schools, early childhood centers and after-school programs across the state.

Interested? It's easy to get involved!

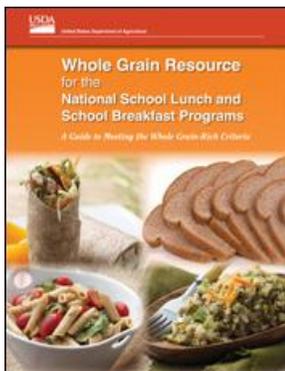
- Share your youth garden story or resources on the Wisconsin School Garden Initiative website at <http://www.communitygroundworks.org/what-we-do/wsgi>.
- Subscribe to the Wisconsin School Garden Initiative newsletter at <http://communitygroundworks.us7.list-manage.com/subscribe?u=de183d3fbb459b209137418c7&id=54fa989f3a>.
- Get inspired by the Wisconsin School Garden Initiative's Facebook page at <https://www.facebook.com/WISchoolGardens> and Pinterest page at <http://www.pinterest.com/wsgi>.
- Sign up to show off your site's garden on a school or early childhood garden tour.
- Host a free school, early childhood, or after-school garden training for staff or community members.

## The Fresh Fruit and Vegetable Program (FFVP)



The SNT received 227 applications for the SY 2014-15 Fresh Fruit and Vegetable Program (FFVP). Applications are currently under review and we anticipate being able to announce FFVP grant recipients by the end of the current school year pending the announcement of USDA funding. For more information about the program, please visit [http://fns.dpi.wi.gov/fns\\_ffvp](http://fns.dpi.wi.gov/fns_ffvp).

## New Whole Grain Resource



The USDA has released a new resource to help schools identify products that meet the whole grain-rich criteria for school meal programs. Currently in SY 2013-14, half of all grains served over the course of the week must be whole grain-rich for both breakfast and lunch. Starting in SY 2014-15, all grains served at breakfast and lunch must be whole grain-rich.

The new resource defines the whole grain-rich criteria, which apply to both foods that are strictly grain and foods that contain grain plus another component, such as meat/meat alternate.

Examples of labels for a variety of grain products are included with explanations of whether the product *is* whole grain-rich, *is not* whole grain-rich, or more information is needed from the manufacturer. Product Formulation Statements for documenting grains and HealthierUS School Challenge whole grain-rich criteria are also covered.

The new resource, *Whole Grain Resource for the National School Lunch and School Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria* is available at [http://fns.dpi.wi.gov/files/fns/pdf/wgr\\_nslp\\_sbp.pdf](http://fns.dpi.wi.gov/files/fns/pdf/wgr_nslp_sbp.pdf). It can also be found under “Hot Topics” on our website.

## The F2S Website Has Been Updated!



The SNT is pleased to announce that the F2S website at [http://fns.dpi.wi.gov/fns\\_f2s](http://fns.dpi.wi.gov/fns_f2s) has been updated to better assist you find what you are looking for! The website contains new and easy-to-find resources on a variety of Farm to School topics shown below.



## Growing Hydroponic Lettuce in Holmen, WI

The Food Service Director for Holmen School District, Mike Gasper, and Agricultural Education Teacher, Roger King, have teamed up to create a unique learning environment that flawlessly transitions education from the classroom to the cafeteria. Nutrition Program Consultant Katherine Pike visited the high school’s hydroponic lettuce garden in January, and although the weather was below zero, the greenhouse had an abundance of fresh locally grown food!

Hydroponics is a method of growing plants in a mineral nutrient solution and water instead of using soil. You will see in the picture that no soil is needed to grow beautiful heads of fresh lettuce.



King was approached by one of his students about the idea of starting an “indoor garden” through the use of hydroponics after her father, who was a farmer, became disabled and she wanted a way he could still feel connected to the growing process. King jumped on the opportunity and began a partnership with Gasper to utilize a F2S grant to initiate the project. The lettuce is grown and maintained by students in Agricultural Education classes and is used daily in Holmen High School’s school lunch program.

Beyond the hydroponic lettuce garden, the district has high hopes to expand their F2S program. King and Gasper are currently in the planning phases of raising local chickens in the community to use in the NSLP. The district is also hoping to plant windowsill strawberries and maybe add herbs like cilantro to the greenhouse.

Holmen School District currently has a strong comprehensive F2S program that includes cooking demonstrations by a local chef, Harvest of Month items featured on school menus, farm field trips, and an outdoor potato and sweet corn garden that students assist with. The SNT is pleased to commend Holmen School District on their program and is looking forward to hearing more about their upcoming plans.

If you have a F2S program at your school or district that you would like featured in a future SNT newsletter, please contact Katherine Pike at [katherine.pike@dpi.wi.gov](mailto:katherine.pike@dpi.wi.gov) or Lizzie Severson at [lizabeth.severson@dpi.wi.gov](mailto:lizabeth.severson@dpi.wi.gov).

## Breakfast in the Classroom (BIC) Pilot Grant

The SNT partnered with the Wisconsin Milk Marketing Board (WMMB) to encourage schools to start a BIC program on a four-week trial basis this spring by offering pilot grants. Applications went out in March and the selected schools were notified on April 2.

Congratulations to Prairie View Elementary, DeSoto Area School District; Humke Elementary, Nekoosa School District; and Believers In Christ who all received \$500 mini-grants as well as “got milk?” insulated cooler bags. We look forward to hearing the success stories of these pilot programs and hope they all decide to continue with implementation of the SBP in the fall. If you’re interested in starting a breakfast program at your school, or if you have questions about BIC, please contact Tracy Pierick at [tracy.pierick@dpi.wi.gov](mailto:tracy.pierick@dpi.wi.gov) or 608-266-7112.

## Breakfast Promotional Video



The SNT also teamed up with University of Wisconsin-Extension and the WMMB to work with the University of Wisconsin Clearinghouse to create a video highlighting the importance of school breakfast programs in Wisconsin. The target audience for this video will be parents and we hope that the video will be shown at PTA/PTO meetings, school wellness programs, or other events to gain parent support for the SBP. It can be used as a tool for schools that are looking to start a program or to gain support and increase participation in their current program. The video will be available at [http://fns.dpi.wi.gov/fns\\_market3#parentvideo](http://fns.dpi.wi.gov/fns_market3#parentvideo) sometime this summer.

## Don't Forget to Run the Paid Lunch Equity (PLE) Tool!

Now is the time to start talking with your school boards and administrators about the PLE requirement if you need their approval to raise lunch prices. All SFAs must run the PLE tool annually to document if and how much paid lunch prices need to be increased. Don't wait until the fall to run this tool as prices must be set at the appropriate amount required in the tool starting the first day of SY 2014-15.

Please note that the SNT will not approve your annual online school nutrition contract unless an increase is shown on the meal charges page or unless the tool is sent to your contract approver documenting no increase was required.

You can access the 2014-15 PLE Tool and instructions on our website at [http://fns.dpi.wi.gov/fns\\_cnrsnp#cnrsnplp](http://fns.dpi.wi.gov/fns_cnrsnp#cnrsnplp).



## Direct Certification (DC) Question of the Month

As you may be aware, the DPI received a three-year USDA Direct Certification Implementation Grant in 2012 to improve Wisconsin's DC process and increase the DC rate.

As part of the improvement process, we have begun a “Question of the Month” series. Every first Monday of the month, a new question concerning DC will be answered. If you'd like to be added to the email list or submit a question for this monthly series, please email our DC specialists at [directcert@ckfwi.org](mailto:directcert@ckfwi.org).

The series began in January 2014 and will continue through the end of the school year. The Frequently Asked Questions (FAQs) document will be updated monthly to include each new question. You will find the FAQ document and other helpful information on the direct certification web page located at [http://fns.dpi.wi.gov/fns\\_directcert](http://fns.dpi.wi.gov/fns_directcert).

### Sample Question of the Month

**Question** - I run DC often and always put my downloaded match file from the state's Direct Certification Program (DCP) into my school's software program. Should I be saving a copy of the match file that comes from the state's DCP before putting it into my software program? Do I really need to save the file after every match I complete?

**Answer** - Yes, the match file should be downloaded and saved every time you run DC. It is very important to save the match file in a secure place. These files are as important as approved paper applications because they are your proof of eligibility.

When the DPI comes in to conduct your Administrative Review (AR), the consultant(s) will ask to see the original match file. If the original file is not available, your SFA will be cited and corrective action will be required. There is also the potential for fiscal action depending on the specific situation.

The match file is returned from the DCP in a Notepad file format and the original match file should be saved to your computer. Along with saving it in the original format, the match file can be saved in Excel or any other software program you are using. You may also print the match files out and save them as a hard copy. It is important to save the file soon after you run DC, as match files are only available for download on the DCP for 14 days.

**DC TIP:** Create a DC folder on your computer to store all electronic files and/or create a file folder to house all paper DC documents. This will be especially beneficial during your SFA's AR, as you will have quick access to any documentation that is requested.

## **SP 13-2014: School Food Service Account Revenue from the Sale of Non-Program Foods.**

If the school food service account is used to provide goods and/or services for other programs within the school, the school food service account must be fully reimbursed for any and all costs for the goods purchased, as well as any labor costs associated with purchasing these goods. The additional purchase also must not create a material change in the school food authority's contracts.

## **SP 14-2014: National School Lunch Program Equipment Assistance Grants – Fiscal Years (FY) 2010 and 2013.**

The FY 2013 Agriculture Appropriations Act authorized \$9.7 million for the Food and Nutrition Service (FNS) to provide grants to SAs for providing equipment assistance to SFAs participating in the NSLP. This was combined with the \$1.25 million remaining funds from the FY 2010 NSLP Equipment Assistance funds for a total of \$11 million available funds.

Unfortunately, FNS determined that awarding grants to all 50 states was not feasible. They elected to target a smaller number of SAs to make the greatest impact on need in the selected SAs, make best use of the funds available, and ensure that the administrative cost associated with the grant process in SAs is reasonable given the grant funds available.

Along with geographical balance, FNS also looked at free and reduced-price participation in the NSLP and a measure of unmet need from previous NSLP Equipment Assistance Funding. Using these criteria, we are sad to report that Wisconsin did not qualify for funding.

## **SP 15-2014: Paid Lunch Equity: School Year 2014-2015 Calculations and Tool.**

This memo provides the updated PLE tool for SY 2014-15 which is posted, along with updated instructions on the SNT website, at [http://fns.dpi.wi.gov/fns\\_cnrsnp#cnrsnplp](http://fns.dpi.wi.gov/fns_cnrsnp#cnrsnplp). The average weighted price for SY 2014-15 is \$2.65. There are two ways to meet this requirement: through the prices charged for "paid" meals or through other non-Federal sources provided to the nonprofit school food service account.

Please refer to the SNT memo dated February 7, 2014 at [http://fns.dpi.wi.gov/files/fns/doc/snt\\_mail\\_020714.doc](http://fns.dpi.wi.gov/files/fns/doc/snt_mail_020714.doc) for more detailed information on PLE. As a reminder, it is required that all SFAs run the PLE tool annually and adjust paid lunch prices if required.

## **SP 16\_SFSP 14-2014: Demonstration Project for Non-Congregate Feeding for Outdoor Summer Feeding Sites Experiencing Excessive Heat.**

This memo is extending the 2013 demonstration project allowing non-congregate feeding at certain outdoor summer meal sites experiencing excessive heat to summer 2014. This memo includes FAQs regarding the administration of the demonstration project.

## **SP 17-2014: Discretionary Elimination of Reduced Price Charges in the School Meal Programs.**

SFAs may offer meals at no charge to students who qualify for reduced price meals. These expenditures may be funded from the nonprofit food service account. The SFA may opt to reduce the price of meals rather than eliminating it entirely. SFAs electing to take advantage of this flexibility continue to claim meals in the reduced price category for these students. Only paid students will be charged for meals. This flexibility is permitted to be implemented selectively between programs and serving sites. SFAs should do a thorough analysis of their operating costs to ensure they can maintain their program without the revenue generated from charging students for reduced price meals.

## **SP 19-2014: Community Eligibility Provision: Department of Education Title I Guidance.**

One of the most common questions we get about CEP is how it will affect other funding sources if the school meal applications are no longer used. This memo highlights the guidance received by the United States Department of Education on how CEP data can be utilized for Title I funding. The DPI is having discussions internally on how to transition programs to utilize CEP. Until then, for SY 2014-15, the DPI still encourages the use of an alternative household income form to replace the school meal application for other programs.

This form is located on our website for your convenience at [http://fns.dpi.wi.gov/fns\\_cep](http://fns.dpi.wi.gov/fns_cep). Please note, the distribution and processing of these alternative applications cannot be funded through the non-profit school food service account.

## **SP 21-2014: Community Eligibility Provision: Guidance and Q&As.**

This memorandum provides background as well as guidance and Q&As that address common questions on CEP, which will be implemented nationwide beginning July 1, 2014.

## **SP 23-2014: Questions and Answers Related to the "Smart Snacks" Interim Final Rule.**

Long awaited answers to some of the questions we have been receiving are here. This Q&A addresses:

- Combination Foods
- Beverages
- Soy Products
- Entrees
- Nutrition Standards
- Saturated Fat Requirement
- Trans Fat Requirement
- Fundraisers
- Sale of Food
- Applicability of Smart Snack Standards

As the rule goes into effect July 1, 2014, please take the time to read this document to help you get prepared.

### **SP 24-2014: Additional Administrative Reviews Guidance.**

Due to the increased frequency of administrative reviews as a result of Section 207 of the HRFKA, SAs are no longer required to conduct additional administrative reviews, beginning this school year.

### **SP 25-2014: School Food Authorities Purchasing Produce from U.S. Department of Defense (DoD) Vendors Using Section 4 and 11 or Fresh Fruit and Vegetable Program Funds.**

This guidance memo reminds SFAs that all procurement using federal funds must follow the procurement regulations. In conducting the procurement, it is permissible for SFAs to include vendors that provide services through DoD Fresh when soliciting bids. After evaluating all bids, if the SFA determines that the DoD Fresh vendor's bid is the winning submission, the SFA must directly contract with the vendor, as they would with any other commercial procurement.

It is not permissible for SFAs to place orders through DoD's FFAVORS system for any purchases, either formally or informally, to be paid for with Section 45 and 11 or Fresh Fruit and Vegetable Program funds. Those SFAs that are doing so will no longer be able to do so beginning in SY 2014-15.

### **SP 28-2014: Paid Lunch Equity: Guidance for School Year 2014-15.**

The USDA has extended the ability for SFAs to apply for a PLE exemption for SY 2014-15. SFAs that demonstrate they will have an excess cash balance, are certified and receiving the additional 6 cents and demonstrate they are financially prepared to meet the meal pattern requirements and future requirements, may be exempt from raising paid meal prices, if required according to the PLE tool, with state approval. This PLE exemption form is available on the SNT website at [http://fns.dpi.wi.gov/fns\\_cnrsnp#cnrsnplp](http://fns.dpi.wi.gov/fns_cnrsnp#cnrsnplp).

The form, along with a copy of your completed PLE excel tool, can be submitted to Karrie Isaacson for approval. Please note that this is an annual exemption. If your SFA received an

exemption for SY 2013-14, you will need to apply for an exemption again for SY 2014-15.

### **SP 29-2014: Consolidated Appropriations Act Report Language on Waivers for School Breakfast and Smart Snacks.**

The USDA is informing all of us through this memo that SA are not able to provide waivers for SBP and Smart Snacks requirements that go into effect on July 1, 2014. Unfortunately, even though the consolidation Appropriations Act, 2014 (P.L. 113-76) stated we would be doing this, the USDA has confirmed that we are prohibited by Federal law to do so. The SNT is committed to providing training and technical assistance to schools to help ensure the continued successful timely implementation of these new regulations.

## **Amendments & Addendums**

Frequently, SFAs have questions regarding the acceptance of addendums or amendments to change the terms and conditions to an awarded contract. An SFA should first know the difference between an "amendment" and an "addendum."

- An **amendment** makes a change to, or "amends" an already existing contract. Many contracts contain language that requires any change to the contract be in the form of an amendment, which must be in writing and signed by both parties.
- An **addendum** is something that "adds to" a contract. It's normally referenced in the contract. Addendums are often used to explain something in a contract such as a list of goods or services to be included. Addendums can also be used to document changes to a contract resulting from negotiations prior to signing, or responses to questions by offerors to invitation for bid (IFB) or request for proposals (RFP) prior to the due date.

When presented with an amendment or addendum, the SFA should defer to the SFA's contracting policy and seek legal counsel. Furthermore, the SFA should keep the following in mind:

- The SNT only reviews procurement documents, contracts, addendums or amendments for compliance with applicable Federal and State regulations.
- The SFA is responsible for the administration of the awarded contract and acceptance of any addendums or amendments.
- If the awarded contract was procured properly and the offeror agreed to the initial terms and conditions in the awarded contract, then question if an addendum or amendment is needed.
- Be aware that addendums or amendments may cause a material change.
- If circumstances around the awarded contract have changed, then it may be time to procure and award a new contract, and let competition drive those changes.

# Legislative Updates



## Professional Standards

The proposed rule, Professional Standards for State and Local School Nutrition Programs Personnel, was published on February 4, 2014. Please refer to the handout enclosed with this newsletter for a table of proposed standards. The comment period ended April 7. For the full proposed rule, go to [http://fns.dpi.wi.gov/fns\\_regs](http://fns.dpi.wi.gov/fns_regs).

Section 306 of the HHFKA puts forth the requirement to:

- Establish a program of mandatory education, training, and certification for all school nutrition directors responsible for the management of a SFA. The program must include minimum educational and periodic training requirements necessary to successfully manage the school meal programs.
- Require that each local educational agency (LEA) or SFA ensure that local nutrition personnel complete annual training and receive annual certification to demonstrate competence in the areas covered by the training, including ensuring individuals conducting or overseeing administrative procedures receive training at intervals defined by the USDA.
- Establish criteria and standards for states to use in the selection of SA directors with responsibility for the NSLP and SBP.
- Require each state to provide at least annual training in administrative practices to the LEA and school nutrition personnel.

## Local Wellness Policy Implementation

On February 26, 2014, the USDA released the Proposed Rule for Local Wellness Policy Implementation under the HHFKA. This proposed rule would require all LEAs participating in the NSLP and/or the SBP to meet expanded local school wellness policy requirements consistent with the new requirements set forth in section 204 of the HHFKA.

The provisions of this proposed rulemaking would ensure LEAs establish and implement local school wellness policies that meet minimum standards designed to support a school environment that promotes sound nutrition and student health, reduces childhood obesity, and provides transparency to the public on school wellness policy content and implementation. The comment period on the proposed operational changes closed April 28, 2014.

More information on wellness policies and the proposed rule can be found at [http://fns.dpi.wi.gov/fns\\_regs#pprl](http://fns.dpi.wi.gov/fns_regs#pprl).

## Independent Review of Applications

The final rule, published on February 6, 2014, requires certain LEAs participating in the NSLP to conduct an independent review of initial eligibility determinations for free and reduced-price school meals. In addition, the LEAs are required to submit to the SNT the results of the reviews including the number and percentage of reviewed applications for which the eligibility determinations changed and the type of change made. The SNT, in turn, is required to submit this information to the Food and Nutrition Service of the USDA.

### *Selection Criteria*

LEAs will be selected if they demonstrate a high level of, or are at risk for, certification errors. The SNT will select LEAs based on two criteria:

1. All LEAs with 10 percent or more of the certification/benefit issuances in error as determined by the SNT during an administrative review; and
2. LEAs not selected under Criterion 1 that are at risk for certification error, as determined by the SNT. SAs are strongly encouraged to include those LEAs with between 5-10 percent of the certification/benefit issuances in error, as determined under an administrative review.

LEAs selected must conduct a second review of applications until LEA-provided documentation demonstrates to the satisfaction of the SNT, that no more than five percent of reviewed applications required a change in eligibility determination, which may include documentation obtained through an administrative review.

### *Reporting Requirements*

LEAs will need to report on applications for the current school year that have been reviewed on or before October 31, a date consistent with already existing reporting requirements. The SNT will have discretion in establishing the reporting format and timeframe for report submission, provided such timeframes permit the state to meet its reporting deadline to the USDA.

### *Implementation*

- LEAs subject to a second review will be identified and notified by SNT no later than June 30, 2014.
- Identified LEAs must conduct second reviews of applications starting in SY 2014-15.
- Affected LEAs must submit to the SNT, an annual report on the results of the second review in a format prescribed, no later than the date specified.
- The SNT must submit a report providing LEA-level information including the number of free and reduced-price applications subject to a second review in the LEA, the number and percentage of reviewed applications for which the eligibility determination was changed in the LEA, and a summary of the types of changes that were made to applications reviewed in the LEA to the USDA no later than March 15.

# Community Eligibility Provision (CEP)

As part of the HHFKA, beginning in SY 2014-15, all states must offer the CEP. The CEP is a four year reimbursement alternative for high poverty LEAs and schools participating in the NSLP and SBP. It is intended to improve access to free school meals in eligible high poverty LEAs and schools, and eliminate the administrative burden associated with collecting household meal applications.

The SNT website has a listing of which LEAs and schools are eligible or near eligible to participate in CEP, along with a Monthly Federal Reimbursement Estimator that can assist you in determining if CEP is a good financial decision for your LEA.

Any LEA or schools interested in participating in CEP beginning in SY 2014-15 must complete the CEP application which includes a CEP Participation Agreement and CEP Eligibility Worksheet. This application must be submitted to Karrie Isaacson at [karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov) or faxed to Karrie at 608-267-0363 by June 30, 2014.

The application, along with more detailed information and resources on CEP, can be found on the CEP webpage on the SNT website at [http://fns.dpi.wi.gov/fns\\_cep](http://fns.dpi.wi.gov/fns_cep).



## Food Safety Reminder

All too often when reviewing Food Safety Plans/Temperature Logs we see the same temperatures or temperatures ending in zero or five being recorded daily. Is this really accurate? We all know the temperature of freezers, coolers, and hot and cold foods will fluctuate. Our temperature logs should reflect this. Keep reading for tips on how to use a metal-stem thermometer.

**Step 1:** Clean and sanitize the metal stem of the thermometer before and after you use it in a food.

**Step 2:** Stick the stem of the thermometer into the thickest part of the food, about 2 inches deep. Be careful not to touch fat, bone, or the cooking pan. Do not leave the metal stem thermometer in the food during cooking.

**Step 3:** Wait for the dial or the digital indicator to stop (about 15 seconds) and then read the temperature.

Be sure to calibrate thermometers on a regular basis. Also, calibrate thermometers when they are bumped or dropped to maintain accurate readings. Keep hot food at or above 135 °F if you are holding food before it is served. Keep cold food at or below 41 °F before it is served.

**Is the BEAN/PEA vegetable sub-group difficult to menu?** Popular ways to incorporate beans, peas, and legumes into your weekly menus include refried beans, baked beans, barbeque beans, hummus, shelled edamame, and chickpeas. Also, make sure to try the Confetti Soup and Harvest Salad recipes from the *On Wisconsin!* Menus at [http://fns.dpi.wi.gov/fns\\_wicyclemenu](http://fns.dpi.wi.gov/fns_wicyclemenu).

## First Sodium Target in School Meals

Beginning July 1, 2014, the average daily sodium content over a school week must be monitored and kept below a certain threshold depending on the age/grade group of the students you serve.

Sodium (mg) Limits for SY 2014-15			
	K-5	6-8	9-12
Breakfast	≤ 540mg	≤ 600mg	≤ 640 mg
Lunch	≤ 1230mg	≤ 1360mg	≤ 1420mg

Don't let worrying about the sodium content of school meals raise your blood pressure. The Center for Disease Control says limiting sodium intake helps to reduce the risk of chronic diseases, including cardiovascular disease, heart attack, and stroke by *lowering* your blood pressure.

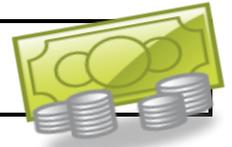
The targeted sodium values for SY 2014-15 are approximately only 5-10% less than the national average baseline. Here are some tips to continue offering delicious healthy meals that meet the meal pattern regulations.

- Offer more fresh and frozen produce instead of canned.
- Compare nutrition fact labels to find the product with the least amount of sodium per serving.
- Order low-sodium USDA Foods, such as their cheese and their canned vegetables.
- Add spices, herbs and salt-free seasoning to prepared dishes instead of table salt.

By serving lower sodium versions of bread, luncheon meat, condiments, and cheese, a turkey and cheese sandwich could have 670 mg less sodium than a sandwich without reduced-sodium products!

**DID YOU KNOW** that there's a difference between "Low Sodium" and "Reduced Sodium" on food labels? *Low Sodium* is defined by the FDA as 140mg sodium or less per serving, while *Reduced Sodium* indicates there is a 25% or less reduction from the usual sodium content of the product.

# Special Edition: Financial Questions and Answers



**Be sure to share these with those responsible for fiscal management of the School Nutrition Programs!** If you are new to the position of financial management for the School Nutrition Programs, just feel you need a refresher, or want to gain a better understanding of new requirements under the HFFKA (Paid Lunch Equity and handling of non-program foods), please consider attending the four-hour Financial Basics course that will be taught as part of the School Nutrition Skills Development Courses this summer. Turn to page two of this newsletter for locations and dates.

1. **Question (Q)** – I have a community member who would like to donate money to food service in order to help families who are in need. How is this handled? Is it allowable to put money into student accounts anonymously? The person donating does not want to be acknowledged in any way.

**Answer (A)** – The donation can be receipted into food service (Fund 50 for public schools, Source 291, Gifts). Since the donation has a specific purpose of helping families who are in need, the school can decide how much of the donation can be added to particular family accounts.

The school should develop some written criteria for deciding which families would qualify for assistance.

2. **Q** – Administration is suggesting that our school offer students a small snack pack to take home after school as we have a high percentage of students eligible for free and reduced-price meals. Can this activity be funded out of our food service account (Fund 50)?

**A** – Money from food service (Fund 50) should not be used to support donations of food for children to take home. It is critical for a school participating in the federal School Nutrition Programs to be able to show that federal and state reimbursement received for reimbursable meals is used specifically to support the cost of providing those meals. Perhaps there is a student or parent group that would like to take on fundraising for this noble cause.

The school may also want to look into administering the Afterschool Snack Program, if they don't already. Information regarding this program can be found on our website at [http://fns.dpi.wi.gov/fns\\_schoolsnacks](http://fns.dpi.wi.gov/fns_schoolsnacks).

3. **Q** – At the end of last school year, we had \$1,425.00 in unpaid student debt for meals and food items sold to students without receiving payment for them. Does this debt just get absorbed by the food service account (Fund 50)?

**A** – NO! The Office of Management and Budget (OMB Circular a-87) states that bad debts are unallowable costs for Federal programs. If a district writes off any uncollectible accounts related to students in food service (Fund 50) which relate to prior fiscal periods, they must record an operating transfer from the general fund (Fund 10) to food service (Fund 50) in the amount of the bad debt.

If the district records a bad debt related to meals served in the current fiscal period, they should simply abate the uncollectible portion against the related revenue account with no operating transfer being required.

4. **Q** – What is our obligation to provide meals to students who do not have money in their account?

**A** – The USDA is clear that the school doesn't have to provide meals to students that do not have money available to pay for it that day. Schools cannot deny a reimbursable meal to a student who is eligible for free meals, nor can they deny a reimbursable meal to a student eligible for reduced or paid meals if the student has money that day to pay for a meal, even if they have a prior debt.

As the leniency of a charge policy is local decision, districts should develop a charging policy with broad input from the school and community and have it board/administrator approved. The charge policy should address the amount of charges allowed for both reimbursable meals and the ability to purchase or block the sale of a la carte items, and whether or not a "substitute" meal will be offered if there is not money available.

Procedures for following up with the households should also be included as part of the policy.

5. **Q** – I've never completed the Annual Financial Report before! What is it and where do I start?

**A** – The Annual Financial Report is the accounting of all revenue and expenditures from July 1 through June 30, and must be submitted by August 31 annually. The report is submitted through our online services at [http://fns.dpi.wi.gov/fns\\_online](http://fns.dpi.wi.gov/fns_online).

For more information regarding completing your Annual Financial Report, you can view the webcast posted at [http://fns.dpi.wi.gov/fns\\_sntwebcasts#finance](http://fns.dpi.wi.gov/fns_sntwebcasts#finance).

6. **Q** – We had a carryover of \$1,500 in student accounts at the end of June (money in student accounts that has not yet been used to pay for meals). How do we account for that on the Annual Financial Report we submit to your agency?

**A** - When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the food service fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the deposit account is converted to revenue.

This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.

7. **Q** - If a food service director were to partner with a school organization (i.e., student council, Future Farmers of America, etc.) and purchase all items through Fund 50 with the students being responsible for the sale of items, could there be a fund transfer out of food service (Fund 50) into the student organization's account to share the profits with the group? If some of the profits remain in food service (Fund 50), could the profits in food service (Fund 50) be used to offer a student scholarship?

**A** - The food service account (Fund 50) should be used to account for the school district's food service programs and not for other purposes. There is no mechanism in Fund 50 to account for transfers out to other funds. If food service is purchasing the items for the group to sell, the group must reimburse the food service account for all costs related to this purchase (food costs as well as any labor costs involved).

Please refer to the USDA Memo SP 13-2014 at <http://www.fns.usda.gov/sites/default/files/SP13-2014os.pdf> for further information. If the student groups are purchasing and selling food items, then the revenues and costs related to those food sales should be accounted for in a student organization fund (Fund 60 and/or Fund 21).

8. **Q** – Our district is considering charging food service for utilities. We understand that this cannot be done unless separately metered or based on a current usage study by the local utility company or knowledgeable entity. There is a Cooperative Educational Service Agency (CESA) that offers this service, working in conjunction with WE Energies. Can the charge for the utility study be charged to food service?

**A** – The cost of the study would be an allowable cost for food service (Fund 50) as long as the cost is reasonable based on several bids or by securing price quotes through an informal bid process if under the district's threshold for bidding out services. If there are

no other companies that do this kind of study, then the district can contract with them. The study would be based on an appropriate methodology for determining usage by building in order to adequately apportion out energy costs.

Examples of unacceptable methodology to base utility usage on include square footage of area or hours a kitchen/cafeteria is used.

9. **Q** – There is a community organization that will be renting out our school kitchen for a function. Would the revenue received for this rental be deposited into the food service fund (Fund 50)?

**A** – Any rental revenue earned would have to be deposited into the school's general fund (Fund 10 for public schools), unless that activity is specific to community service where it would be accounted for in the community service fund (Fund 80 for public schools).

The rules are a bit different if the school is offering catering to outside groups but the school employees are preparing the food. In that case, the expenditures incurred and the revenue from catering sales is accounted for in the food service fund (Fund 50). The USDA Memo SP 13-2014 addresses catering as well.

## Pop Quiz Answer:



**D. Products sold at a school store.** These items would not be exempt.

The Smart Snacks rule only applies to foods that are sold. This would make the situation in answer (A) exempt.

Concessions sold at 6:00 pm are past the 30 minutes after the bell when the rule ends for the day so (B) is also exempt.

Items in the vending machine in the teacher's lounge (C) would be exempt because they aren't accessible to students.

**Snow days? Days off for extreme cold? Planning on extending lunch and/or breakfast for your summer school sessions?** Please remember to amend the end date of programs on the on-line contract for the School Nutrition Programs to reflect the actual end date of the programs. May 16 is the last day you are able to change your contract for 2013-14 SY.



# Special Reminders



**School Lunch Hero Day – May 2, 2014**

<http://www.schoollunchheroday.com>

**Food Allergy Awareness Week – May 11-17, 2014**

<http://www.foodallergy.org/food-allergy-awareness-week>

**SNA of WI Annual Conference – June 29-July 2, 2014**

Location: Kalahari Resort in Wisconsin Dells

<http://www.sna-wi.org/conferences-and-events>

**SNA Annual National Conference – July 13-16, 2014**

Location: Boston, Massachusetts

<http://docs.schoolnutrition.org/meetingsandevents/anc2014>

**National School Lunch Week – October 13-17, 2014**

Theme: Get in the Game with School Lunch

<http://www.schoolnutrition.org/default.aspx>

## School Nutrition Employee Week

May 5-9, 2014

The Department of Public Instruction expresses its deep appreciation to these valuable employees and commends their good work on behalf of Wisconsin children.

# New Wisconsin Rules for Record Keeping: Five is the New Three!



For as long as many can remember, the rules for maintaining records pertaining to the school nutrition program has been three years plus the current year. While this remains accurate under USDA regulations, it is important to note that the DPI has implemented a five year retention rule for all records involving the school

nutrition program. This WI regulation can be found at <http://publicrecordsboard.wi.gov/docview.asp?docid=15892&locid=165>. Page eight of the resource provides a chart showing which school nutrition records must be maintained and for how long.

Under USDA regulations, states have the authority to include regulations that are more restrictive than the federal rules. It is important that moving forward schools need to follow the new guidelines since maintaining program records is considered part of the administrative review process. More information will be included in an upcoming memo but for now it's good to remember that, in Wisconsin, records pertaining to school nutrition programs must be maintained for a total of five years.

# Fluid Milk Substitution Approval Reminder



It is allowable to offer a fluid milk substitution as part of the reimbursable meal to accommodate students' intolerances, culture, religion, or ethical beliefs. However, fluid milk substitutions offered as part of the National School Lunch and School Breakfast Programs must be nutritionally equivalent to cow's milk for the following nutrients: calcium, protein, vitamin A, vitamin D, magnesium, phosphorus, potassium, riboflavin and vitamin B-12. As a reminder, all fluid milk substitutions must be approved by our department. To request approval, submit documentation of the milk's nutritional content to Linda Krueger or Maggie Sanna on the School Nutrition Team. For more information about fluid milk substitutions, including exact amounts of each nutrient required, please visit [http://fns.dpi.wi.gov/fns\\_regs](http://fns.dpi.wi.gov/fns_regs).

# School Nutrition News

Is published three times per year by the Department of Public Instruction. Questions or comments should be directed to:

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Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

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For the Spanish translation of the USDA's non-discrimination statement, please visit <http://fns.dpi.wi.gov/files/fns/doc/ndst.doc>.

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