

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

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**School Food Authority: Adams Friendship**

**Agency Code: 10014**

**School(s) Reviewed: Adams Friendship High School**

**Review Date(s): January 23-25, 2018**

**Date of Exit Conference: Jan 25, 2018**

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

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

**General Program Reminders/Updates:**

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

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Adams Friendship School District for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

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

Records were organized and available.

#### Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

#### Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

#### Household Size Box

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

### Incomplete Applications

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

### Other Source Categorical

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

### Disclosure

- 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, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) 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>). **Technical assistance** was provided.
- 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](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

### 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:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need)
  - 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.

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

- **Finding:** The SFA was not using the correct public release that is required for a CEP School district.

**Corrective Action Needed:** Please submit a statement summary of how this will be corrected in the future.

**Finding:** The finding was that the application being utilized by the district was not the correct one. The school participates in CEP and is required to use the application, which has language related to CEP as required by USDA.

**Corrective Action Needed:** Please submit a statement how this will be corrected in the future.

**Finding:** The finding was that there were three applications in the sampling size found to be incomplete. The SFA is required to follow up with households before a determination of meal eligibility can be determined. **Technical assistance** was provided. These errors have been recorded on the SFA 1 form.

**Corrective Action Needed:** SFA needs to follow up with families to correct these incomplete applications.

### Verification

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

Verification is only required when eligibility is determined through the application process, and is not required for eligibility determinations made through the direct certification process. Each year schools must annually verify eligibility of children from a sample of household applications approved free and reduced price benefits for that school year.

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

### Findings and Corrective Action Needed: Verification

**Finding:** The finding was that there was confusion on the role of the confirming official.

**Corrective Action Needed:** Please review the verification website and verification webcasts and submit a statement on the role of the confirming official and the process the SFA will use in the future regarding the confirmation review.

**Finding:** The finding was that the documentation supplied by the household for one of the selected applications for verification was not correctly determined by the SFA. It appeared the SFA used the net income instead of gross income, as the gross income was not listed on the document. This error was recorded on the SFA-2 form.

**Corrective Action Needed:** Please contact household and request documentation that shows the gross amount listed. If their eligibility status changes please follow proper procedures regarding the change

due to verification. In addition, please submit a statement of understanding of which income to use when looking at gross income and net income.

❑ **Finding:** The finding was that a letter of adverse action is not typically sent regarding a reduction in benefits for the verification process.

**Corrective Action Needed:** Please submit a statement of understanding of the process required when there is a reduction in benefits regarding verification. Please send a copy of the letter template that the district will be utilizing moving forward.

### **Meal Counting and Claiming**

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

#### **Meal Counting and Claiming**

- The meal counting and claim for the review month was conducted correctly.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

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

The food service department is doing a fantastic job of offering a variety of healthy, appealing meals to students. The serving area is pleasant, clean, and appealing, and meals are presented in a way that draws students' attention. Thank you to the food service director for sending organized, thorough meal pattern documentation prior to the on-site review, and for being open to suggestions and eager to learn. Keep up the good work!

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

#### **Crediting Fruit**

According to the USDA [Food Buying Guide for School Meal Programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (<http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>), a 18-count cantaloupe credits as 2 ½ cups fruit. This means that 1/5 of a melon credits as ½ cup fruit. A 15-count cantaloupe credits as 4 cups fruit, which means that 1/8 of a melon credits as ½ cup fruit.

#### **Crediting Meat/Meat Alternates**

Some meat/meat alternates do not credit ounce-for-ounce because they contain ingredients other than meat (e.g. water, fillers, breading). For example, USDA diced ham credits as 1 ounce equivalents (oz eq) for every 1.22 ounces by weight. Therefore, a 1 oz serving of ham equals 0.75 oz eq. In order to serve 1 oz eq of ham, you need to serve 1.22 oz by weight. You will need to weigh the ham using a scale in order to determine this. Similarly, the USDA deli turkey credits as 1 oz eq for every 1.43 oz by weight. Make sure to use current product information to determine the weight of each serving in order to meet the daily and weekly requirements.

#### **Crediting Documentation**

Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs (FBG) requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must 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. It is highly preferred that this documentation is 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 FBG, 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 [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

### **Production Records**

The Grab n Go and Green Devil Special lines are currently both recorded on the same production record. In most cases it is not noted which fruits and vegetables are offered on which lines. When questioned, staff could identify which fruit and vegetable was offered on which line; however, this is not a reliable method of documentation. To ensure that daily and weekly fruit and vegetable requirements are met, it is extremely important to designate which items are offered on which line. You could also choose to record these two separate lines on two separate production records.

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

❑ **Finding:** Several different types of signage are posted throughout the cafeteria, which helps students to select a reimbursable meal. However, one of the signs posted at the register and on the bulletin board states that students must select three items at breakfast and lunch. At lunch, students must select three components, not items. This signage should be updated to clarify the difference in Offer versus Serve (OVS) between breakfast and lunch. Additionally, signage should be posted at the Grab n Go line to inform students that they may take up to 1 cup of fruit and 1 cup of vegetable. This signage should also reflect the lunch OVS requirements.

**Corrective Action Needed:** Please submit a photo or a copy of updated signage that correctly states that at lunch, students must select three components including ½ cup fruit and/or vegetable. Please submit a photo or copy of signage posted at the Grab n Go line.

❑ **Finding:** During the week of review (December 11-15, 2017), there were no vegetables from the starchy vegetable subgroup offered on the Grab n Go line or on the Green Devil Special line. For grades 9-12, ½ cup of starchy vegetable must be offered each week.

**Corrective Action Needed:** Please submit one week of completed production records from the Grab n Go and Green Devil Special lines to show that all vegetable subgroup requirements are met.

❑ **Finding:** On Tuesday, December 12<sup>th</sup> there was no fruit recorded on the production records at breakfast. Students were able to take two ½-cup juices, so their daily fruit requirement of 1 cup was met. Fruit was very likely offered as it is offered every day, but if it is not documented on production records it is not possible to prove that it was part of the reimbursable meal. On every other day of the review week, 50% of the fruit component was offered in the form of juice (two cups of fruit were offered, with 1 cup of fruit in the form of juice). However, since one day of the review week offered

100% of the fruit component in the form of juice, the weekly percentage of juice offered exceeded the 50% limit.

It would be helpful to have clear signage that tells students how much fruit and juice they may take. Based on meal service observation, it is clear that students know they can take two ½-cup servings of fruit and two ½-cup servings of juice, but the signage should reflect this.

**Corrective Action Needed:** Please submit one week of completed breakfast production records to show that the week complies with the 50% juice limit.

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

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

#### Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.
- 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 “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “Ala Carte”, you should be reporting 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 would also be included here.
  - When revenues are recorded from the federal reimbursement payments, you want to 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 a food expenditure.

#### Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.

- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Bad debt 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](#) may be found on our [Financial Management](#) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>, <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, by July 1, 2017, 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>).
- 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>
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter
  - Sample robo-call script

### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

**□ Finding:** The finding was that the unpaid meal balance policy is not provided in a written format to families at the beginning of the year.

**Corrective Action Needed:** Please provide a statement on how this will be corrected in the future.

### **Paid Lunch Equity**

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

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

### **Revenue from Nonprogram Foods**

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

#### **Non-program Foods**

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.

- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

### **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, SFAs must at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist you 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>)
- [Nonprogram Foods In a “Nutshell”](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>).

### **Findings and Corrective Action Needed: Revenue From Nonprogram Foods**

**Finding:** The finding was that the non-program food revenue tool was not completed as required by USDA.

**Corrective Action Needed:** Please complete the tool and submit to reviewer. **Corrected on-site.**

### **Indirect Costs**

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

### **Indirect Costs**

- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
  - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
  - Utility charges - separately metered or current usage study by the local utility company.
  - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
  - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume.

- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

#### 4. GENERAL PROGRAM COMPLIANCE

##### Civil Rights

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

##### Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).
- However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, "This institution is an equal opportunity provider." Both statements should be in the same size font as the other text in the document.

##### And Justice for All Poster

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

##### Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

##### Civil Rights Self-Compliance Form

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

##### Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have 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.
- Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable.

##### Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal prices for student meals at lunch are visible on the computer screen that can be seen by students, which constitutes overt identification. **Technical assistance** was required.

## Processes for complaints

- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time.
- However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complain Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\_combined\_6\_8\_12.pdf).
- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.

## Findings and Corrective Action Needed: Civil Rights

**Finding:** The finding was the printed menu posted did not have the current non-discrimination statement listed. This also included the menu listed on the website.

**Corrective Action Needed:** Please correct this and submit a copy of the menu with the corrected on-discrimination statement. **Corrected on-site no further action needed.**

**Finding:** The finding was the computer screens at lunch did show overt identification of students.

**Corrective Action Needed:** Please correct this as soon as possible. **Corrected on-site no further action required.**

## On-site Monitoring

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

#### On-site monitoring

Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1. **Technical assistance** was required regarding monitoring breakfast.

## Local Wellness Policy

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

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 2016-2017 and full compliance with the requirements 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 each school complies with the policy.

### **Content of the Wellness Policy**

At a minimum the wellness policy must include:

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>). LWPs should include specific goals related to:

- 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).

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](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)). 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>).

**Technical assistance was provided and resources were left on-site.**

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

❑ **Finding:** The finding was that the wellness policy was not updated to reflect current USDA requirements. The district has a committee that has met and there are planned meetings to work on updating the policy.

**Corrective Action Needed:** Please submit a statement summary regarding the following items:

- How will the district allow for public participation regarding the wellness committee?
- Titles of whom are involved in the policy.
- Provided a timeline for updating the policy with required elements and goals.
- State how the policy will be monitored.
- Included an understanding of the requirement to report triannual to the public how the policy is working for the district.

## **Smart Snacks**

10% of the foods and beverages sold by food service were checked for compliance, and all were found to be compliant with the Smart Snacks rule. The food service director is the point person for food and beverages fundraisers held by student groups, and there is a system in place to approve these fundraisers. There is one vending machine in the cafeteria that sells non-compliant beverages, but it is turned off during the school day. Adams-Friendship High School should be commended for the hard work they've done to meet the Smart Snacks standards!

## **Professional Standards**

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

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of their 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, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- **Annual Training Requirements for All Staff**  
 Directors: 12 hours  
 Managers: 10 hours  
 Other Staff (20 hours or more per week): 6 hours  
 Part Time Staff (under 20 hours per week): 4 hours

If hired January 1 or later, only half of the training hours are required during the first school year of employment. **Food Service director does have a tool in place for tracking professional standards. Suggestions were recommended to add a few elements to the tracking tool as required by USDA.**

## Water

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

Water is available adjacent to the cafeteria area.

## Food Safety and Buy American

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

#### **Sharing and No Thank You Tables**

Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.

#### **Sharing Table**

A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

#### **No Thank You Table**

A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, a designated worker or trained individual must inspect the items for wholesomeness.

**Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.**

## Considerations

1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
4. Parents will be informed in writing.
5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

## Wholesome Leftovers

Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. “Wholesome” must be defined by the SFA as part of the SOP.

**Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.**

Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

## Monitoring Log

Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

**Technical assistance was required regarding sharing tables.**

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

## Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

### **Food Safety Plans**

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)

### **Food Employee Reporting Agreements**

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

**Technical assistance** was provided as it was noted that leftover food is being stored in containers that are not approved for reuse. It is encouraged to consult the local sanitarian on what is recommended for proper storage.

### **Buy American**

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

More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>). **Technical assistance** was provided.

### **Findings and Corrective Action Needed: Food Safety and Buy American**

**Finding:** The finding was that there was no sanitarian-approved SOP for sharing. In addition, there was not a consistent monitoring of the sharing table.

**Corrective Action Needed:** Please submit a statement on how this will be corrected. Submit copy of approved SOP with proof of sanitarian approval as an attachment to assigned DPI Nutrition Program Consultant via email. Please include the person(s) who will be monitoring the table.

**Finding:** The finding was that the health inspection report was not posted in place where the public can see it.

**Corrective Action Needed:** Please correct this issue. **Corrected on-site no further action needed.**

**Finding:** The finding was dish machine temperatures were not being documented.

**Corrective Action Needed:** Please submit a week of dish machine temperatures that have been documented.

❑ **Finding:** Products were identified in SFA’s storage area as non-domestic and not listed on the Buy American – Noncompliant List or SFA equivalent form that is now required to be utilized.

**Corrective Action Needed:** Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. A [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

### **Reporting and Recordkeeping**

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

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

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

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

###### **Breakfast Program**

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

###### **Summer Feeding**

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

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

### **Afterschool Snack Program**

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

A documentation review was conducted which showed the SFA is in compliance.

## Fresh Fruit and Vegetable Program (FFVP)

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

#### **Cooked Vegetables**

Per USDA's [FFVP Handbook](#), "Fresh (not canned, frozen, dried, or otherwise processed) vegetables that are cooked, must be limited to once-a-week and must always include a nutrition education lesson related to the prepared item" (<https://fns-prod.azureedge.net/sites/default/files/handbook.pdf>).

#### **Fact Sheets**

Check out 78 new fruit and vegetable fact sheets created by the School Nutrition Team and posted on our [FFVP Promotion](#) webpage (<https://dpi.wi.gov/school-nutrition/ffvp/promotion>)!

### Findings and Corrective Action Needed: Smart Snacks

**❑ Finding:** Administrative labor hours are being claimed but are not tracked. Actual labor hours must be tracked; it is not appropriate to claim labor based on an average amount of time spent per month on the program. An Employee Time Sheet is posted on our [FFVP](#) webpage that may be used for tracking administrative labor (<https://dpi.wi.gov/school-nutrition/ffvp>).

**Corrective Action Needed:** After submitting February's FFVP claim, please submit a completed time sheet that supports the administrative labor claimed that month.

**❑ Finding:** On the day of FFVP observation, it was noted that Head Start students were offered their CACFP snack (grain and milk) at the same time as their FFVP snack. The grain and milk were not paid for out of the FFVP grant. It is not advisable to offer FFVP with any other snacks, as this can deter students from trying the fresh fruit or vegetable. While on-site we discussed the possibility of offering the CACFP snack in the morning, and the FFVP snack in the afternoon. There is also a question of whether these Head Start students are considered enrolled in Grand Marsh Elementary School. If they are not enrolled in the school, then they are not technically eligible to receive the FFVP snack. Further research needs to be done on this, and technical assistance will be provided accordingly.

**Corrective Action Needed:** Please submit a written statement confirming that you will offer CACFP snack and FFVP snack at two different times during the school day.

## 6. COMMUNITY ELIGIBILITY PROVISION (CEP) AND PROVISION 2

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

#### Findings and Corrective Action Needed

**❑ Finding:** Application finding was addressed in the benefit and issuance area of this report.

**Corrective Action Needed:** See the benefit and issuance area of this report.

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

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

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

