

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Cambria Friesland School District **Agency Code:** #11-0882

School(s) Reviewed: Cambria Friesland Middle/High School

Review Date(s): January 23-24, 2018

Date of Exit Conference: January 24, 2018

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) 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 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.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at the Cambria Friesland school district for the courtesies extended to us during the on-site review and for answering our questions prior to the onsite visit in a timely manner.

It was apparent that the staff were eager to learn from the technical assistance provided during the review and showed a high interest in incorporating several suggestions into their nutrition programs. The staff is committed to providing the best nutrition program possible to those they serve and it shows. Kudos to administrators for recognizing the important role the school nutrition program plays in ensuring students are well nourished and ready to learn. The support of school administration is critical in ensuring a positive and well managed nutrition program.

It is important to remember the role of the school nutrition director includes numerous responsibilities outside of meal prep. Today's directors are responsible for planning menus that meet USDA regulations and are appealing to students, follow food safety and procurement guidelines, effectively managing USDA foods, maintain an appropriate budget based on meal and labor costs, supervise and train staff, collaborate with administrators, faculty, students and community members and provide administrative support. They must also ensure confidentiality of student meal eligibility, manage an appropriate point of service system, maintain and prepare meals for students with special dietary needs and offer regulatory guidance while promoting healthy choices to students. Kudos to district administration for recognizing the value of a strong school nutrition program.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

Direct Certification

Great job of running direct certification numerous times throughout the year to identify new students that may qualify for meal benefits.

It is a reminder that the DC file from the Division of Children and Families must be maintained by the district even when the software completes and uploads the matches directly into their system. The files from DCF should be spot checked occasionally to ensure accuracy and identify possible software system glitches.

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding: One application was approved for reduced priced benefits rather than free due to a math error. One application was denied incorrectly and should have been determined as reduced.

Corrective Action Needed: Correct the applications and notify the households of the new benefit. The household's should be refunded the money they paid during the period of time the application was incorrect. If the district would like to submit amended claims to reflect the correct meal benefit provide documentation of the number of meals served each month and submit with the corrective action response.

Verification

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

The district did an excellent job of completing the verification process. Please commend the verifying official for her great work with verification.

It is a reminder that once applications are selected 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.

Meal Counting and Claiming

Technical Assistance (TA)/Compliance Reminders

Meal Counts for this review for the lunch and breakfast programs were submitted without errors. Please commend the claim preparer for her diligence in maintaining an appropriate edit check system and submitting accurate breakfast and lunch claims.

The [Wisconsin School Day Milk Program \(WSDMP\)](https://dpi.wi.gov/school-nutrition/milk-programs/wisconsin-school-day-milk) allows schools to claim partial reimbursement for the milk they serve to children that qualify for free or reduced priced meals in grades preK-5 provided during a non-meal time milk break (<https://dpi.wi.gov/school-nutrition/milk-programs/wisconsin-school-day-milk>). Claims are submitted annually in June. The WSDMP requires a Point of Service count (POS) that does not overtly identify children receiving the benefit.

Findings and Corrective Action Needed: Claims – Milk Programs

Finding: The point of service (POS) count for the WSDMP appeared to be obtained through a system based on attendance rather than on accurate milk counts taken at the time the student receives the milk. It seemed that all students were claimed for the milk break unless they were absent rather than counting the students as they received the milk. Staff interviews determined that not all students accept milk each day regardless of payment status. Technical assistance was provided onsite on enabling a counting system that will ensure that WSDMP claims are based on an accurate POS each day.

Corrective Action Needed: Please submit a detailed statement indicating the steps that will be taken to correct the WSDMP POS system to ensure that milks are accurately counted at the time the student accepts the milk.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff at Cambria-Friesland School District for the warm welcome. All food service staff were attentive and receptive to feedback. Thank you for sending thorough and organized meal pattern documentation prior to the on-site review. Having this information in advance helped to expedite the review process. It is great to see that students are being offered multiple fruit and vegetable options daily, with the school using fresh, local product when it is available. The food service staff at Cambria-Friesland Middle/High School show great dedication to providing healthy, balanced, and appealing meals to the students of your school.

Comments/Technical Assistance/Compliance Reminders

Whole Grain-Rich Exemption Request

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. If the SFA can demonstrate a hardship in procuring, preparing or serving a compliant WGR product that is accepted by students, an exemption can be requested for that specific product. Review the August 23, 2017 memo, "[School Meal Flexibilities for School Year \(SY\) 2017-18](#)" for more information on the exemption process (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf>). Note that until an exemption approval has been received, WGR products must continue to be served.

Second Servings of Entrees

Second servings of entrees are currently being offered as an a la carte option on the day it is offered on the menu. This option is sometimes referred to as a "Supersize" option. Based on technical assistance from the previous Administrative Review, staff has attempted to discourage referencing the additional entrees by this term. However, "Supersize" still appears on the printed monthly menu. Consider revising documents to refer to second servings by another term.

Items at Breakfast

Some items offered on the breakfast menu credit as less than 1.0 ounce equivalent (oz. eq.) of grain or meat/meat alternate. An item at breakfast is defined as 1.0 oz. eq. grain, 1.0 oz. eq. meat, ½ cup of fruit and/or vegetable, or 1 cup of milk. Under Offer Versus Serve, four food items must be offered at breakfast, and students must select at least three food items, including ½ cup fruit and/or vegetable to have a reimbursable meal. The Nutri-Grain bar credits as 0.75 oz. eq. grain and the one sausage patty credits as 0.75 oz. eq. meat/meat alternate. While these foods contribute toward the total grain and meat/meat alternate offered, they would not be considered an "item" at breakfast. Under Offer Versus Serve, students must select at least three food items in addition to the Nutri-Grain bar or single sausage patty in order to have a reimbursable breakfast.

Breakfast Signage

Breakfast signage was posted and filled in with the daily menu. However, the signage did not clearly indicate how many food items that each grain menu item was planned as. While it was clear that the food service staff knew the number of food items that each grain menu item was planned as, the breakfast signage should clearly communicate what students may take as part of a reimbursable meal.

Production Records

- Production records are intended to be useful tools to record information prior to production, during production, and following production. The production record template currently in use is missing information, such as detailed menu item information, planned number of portions for each menu item, total number of purchase units prepared, total number of portions prepared, actual milk usage by type, and actual usage for condiments. While there is no required production record template, there are some examples that may be used on our [Production Records](#) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements ("Must Haves and Nice to Haves" list) can also be found on the webpage.
- Be specific on production records about the identity, brand, and description of the items served. There is a wide variation in formulation of the many products served as part of the school meal

programs. Fruit sizes (e.g. case count) should also be recorded. It is helpful to include not just portion size, but also crediting, on the production records. Sample production record templates can be found on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Milk Recipe

If it becomes too time- or labor-intensive to record milk usage by type on production records, you may consider using a milk recipe. A milk recipe is documentation of average milk usage by meal (breakfast or lunch) and grade group. When a milk recipe is on file, total milk usage must still be recorded on production records. Milk recipes must be updated twice per year or when you notice that students' preferences have changed. You can find instructions and a milk recipe template on our [Meal Pattern Components](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk) webpage, under the milk heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk>).

Cereal Recipe and Juice Recipe at Breakfast

Currently, production records list "cereal" and "juice" instead of the individual varieties. Each cereal and juice variety should be listed separately on the production record with actual usage recorded for each variety offered. Alternatively, consider creating cereal and juice "recipes" to document usage. You may use the guidance for creating a milk recipe for directions, but simply substitute your cereal and juice varieties.

Standardized Recipes

- Recipes used during the review week were lacking pieces of information necessary for standardized recipes, such as the serving size per grade group, recipe yield, and serving utensils used. Please use our [recipe tools and resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) to aid in this process (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). There is a checklist of information necessary to standardize a recipe, calculators to assist with nutrient analysis, and a template to help organize the information.
- [USDA's What's Cooking? recipes](https://whatscooking.fns.usda.gov/) include nutritional and crediting information. They are a great resource to use in child nutrition programs (<https://whatscooking.fns.usda.gov/>). Please note, even though USDA calls these standardized recipes, they are in fact quantity recipes. These recipes will only be standardized once they have been tried, tested, and adapted to your food service operation.

Meal Service Line Set-Up

During meal service observation, the line moved slowly. Technical assistance was given to consider rearranging the service area and Point of Service to create two lines. This will likely move students through the line quicker, allowing students more time to eat lunch. Students can continue to serve themselves from the main line and, with some portion education, could serve themselves condiments as well. Training and teaching are needed initially to help this change happen effectively, but just like anything else that happens in a school, it can be taught.

Condiment Usage

Condiments are currently served from the serving line as a way to limit serving sizes. Consider placing condiments on a table in the cafeteria for students to serve themselves. Promote correct serving sizes by adding signage at the condiment station with a photo of what one serving of a condiment looks like, purchasing single-use one ounce cups to aid in portion control, or using signage such as "One squeeze, please!" on self-serve squirt bottles. This may free up serving line staff for tasks such as batch cooking.

Special Dietary Needs

Students seeking accommodations for a diet-related disability must provide a medical statement signed by a licensed medical practitioner (such as a physician, nurse practitioner, or physician assistant). The signed medical statement must include a description of the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, and an explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted). More information regarding accommodating special dietary needs, including a physician's form template, can be found on the [Special Dietary Needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Updated Child and Adult Care Food Program Meal Pattern for pre-K children

If the Cambria-Friesland School District should choose to claim childcare students under the NSLP or SBP in the future, those students must follow the updated Child and Adult Care Food Program (CACFP) meal pattern. The CACFP meal pattern requirements were updated in 2017 to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). For questions about the updated CACFP meal pattern, please contact our specialists: Tanya Kirtz at Tanya.Kirtz@dpi.wi.gov or Erin Opgenorth at Erin.Opgenorth@dpi.wi.gov.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding: An insufficient amount of vegetables from the red/orange subgroup was offered during the week of review. Only $\frac{1}{4}$ cup of carrots was offered during the week, short of the requirement to offer at least $\frac{3}{4}$ cup to the 6-8 grade group and $1\frac{1}{4}$ cup to the 9-12 grade group over the week. Additional vegetables from the red/orange subgroup were offered as part of vegetable blends. However, documentation did not show the ratio of the vegetables in the blends and likely would not have fulfilled the weekly requirement.

Corrective Action Needed: Submit a written statement explaining how you will correct this vegetable group insufficiency.

Finding: Recipes submitted for review were missing pieces of essential information to be a standardized recipe.

Corrective Action Needed: Submit two recipes that have been updated to include all the necessary information. Include the Chinese Style Vegetables as one recipe. Reference the [Standardized Recipe Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf) for all the essential information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf>).

Finding: Production record template is missing required information and does not meet all production record requirements.

Corrective Action Needed: Submit two days of completed production records for both breakfast and lunch showing all the required information from the "[Must Have](#)" list

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>).

3. RESOURCE MANAGEMENT

Comments/Technical Assistance Nonprofit School Food Service Account

Unpaid Meal Charge Policy

- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property unless the school is able to contact the household and return the funds. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Finding: The unpaid meal charges policy indicates that refunds from student accounts will be made on written request. Per the guidance above schools are required to make every effort to return unused funds to the household when they leave the district.

Corrective Action Needed: Submit a copy of an updated Unpaid Meal Charges policy that eliminates the statement indicating that funds will only be returned on written request.

Annual Financial Report (AFR)

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The 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 the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

Finding: The annual financial report beginning fund balance on July 1, 2017 does not match the ending fund balance on June 30, 2017. The issue appears to be carried forward from previous **AFRs**. Technical assistance was provided during the onsite visit to assist the district in determining how to correct the error.

Corrective Action Needed: Determine the origin of the error and submit an amended AFR to Jacque Jordee, Jacqueline.jordee@dpi.wi.gov. Include a copy of the amended report as part of this corrective action response.

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)/Compliance Reminders

- 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.

- Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- The USDA Nonprogram Revenue Tool 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>).

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

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, 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 the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).

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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 Nonprogram Foods Revenue Tool has not been completed for the current school year. The tool should include any food sold outside of the school meals program including foods providing to other school groups for activities not related to the child nutrition program.

Corrective Action Needed: Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool for Cambria School District using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html). If you have questions about the tool please don't hesitate to contact the [school nutrition team](#) for assistance (<https://dpi.wi.gov/school-nutrition/directory>).

Meal Pricing – Adult meals

Finding: Adult meals included second entrees and second portions at no additional charge. Under USDA's non-program foods tool all foods sold outside of the reimbursable meal must be priced at a level that covers the entire cost of producing the food. The adult meal price in Cambria is set at an amount that ensures that federal reimbursements and paid student meals are not subsidizing adult meals. Allowing extra portions, at no additional charge, to adults, results in federal reimbursements and paid student meals subsidizing adult meals. Adults need to pay the same second entrée charge as students in the district. Portions for adults may not exceed the portion size of those served to students in grades 9-12.

Corrective Action Needed: Provide documentation indicating the steps that will be taken by Cambria School District to ensure that adult meal prices do not include second portions or extra food without an extra cost. Also submit the marketing materials that will be used to notify adults of the change in adult meal pricing.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance (TA)/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 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 or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must 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 in a location that is accessible where information on whom to contact with discrimination complaints can be read. The district moved the poster to a more visible area during the review to ensure compliance to this regulation.

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 including administrative staff involved with the benefit issuance process and faculty members involved in meal counting at the POS.

Finding: Civil rights training was not completed for the determining official, the confirming official or the hearing official during the past school year. Each of these individuals are considered front line staff.

Corrective Action Needed: Submit a signature page showing the date the training was reviewed for the officials named above. The Civil Rights Power Point and Attendance Record can be found on our [Civil Rights Resources](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)

- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Finding: The current non-discrimination statement is not included on school menus.

Corrective Action Needed: Submit a copy of a school menu showing the updated statement.

Finding: The [Civil Rights self-evaluation form](#) was not completed by October 31 (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>). The form is required annually to be on file no later than October 31. The form was completed as part of the onsite review. Your signature indicates the intent of Cambria School District to complete the form in a timely manner in subsequent years. The school nutrition [Calendar of Requirements](#) serves as a useful tool for managing reporting deadlines (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf>).

Corrective Action Needed: No further corrective action required. Completed during the onsite review process.

Local Wellness Policy

Technical Assistance (TA)/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 2016-17 with full compliance of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process.

In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Content of the Wellness Policy

At a minimum, the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.
- An assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Resources:

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

Findings and Corrective Action Needed: Local Wellness Policy

Finding: The SFA's local wellness policy has not been updated since 2006. The 2006 policy meets some, but not all, requirements as stipulated above (1000). This was addressed during the 2013 administrative review with extensive technical assistance and again during this review process.

Corrective Action Needed: Please provide a timeline for updating your policy and a copy of the updated policy, once the board approves it. Include a statement indicating how the district plans to invite and include stakeholders in the process, inform and make the policy and subsequent assessments available to the public and review and update the policy as required under USDA regulations. The [Wellness policy checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) provides the tool that will assist in ensuring that policy requirements are met (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>).

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- A beverage vending machine is present in the hallway at Cambria-Friesland Middle/High School. The vending machine was on and functioning during the school day, but there is a sign that states that no purchases may be made during school hours. While no purchases from the vending machine were observed, it is encouraged that the machine is turned off between midnight and 30 minutes after the end of the school day to ensure compliance with the regulations.
- If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie (≤ 5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (< 5 kcal/8 fluid oz.; ≤ 10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable.
- We recommend using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.
- The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Professional Standards

Comments/Technical Assistance (TA)/Compliance Reminders

Cambria school district school nutrition staff were doing an excellent job of tracking their training. Technical assistance was provided during the onsite visit on the new [USDA Professional Standards tracking tool](https://pstrainingtracker.fns.usda.gov/) (<https://pstrainingtracker.fns.usda.gov/>).

Food Safety and Storage

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

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Plans

The nutrition staff at Cambria Friesland School District was doing an excellent job of managing food safety. The food safety plan was accurate and up to date, sanitation inspection reports were posted as required, temperature logs were up to date and available and meals were served from a clean and well managed kitchen. Kudos to the staff for their conscientious management of food safety in the district.

Findings and Corrective Action: Food Safety

Finding: A Standard Operating Procedure (SOP) to address time as a public health control (TPHC) was not included in the HAACP plan.

Corrective Action Needed: Submit updated SOP as an attachments to assigned DPI Nutrition Program Consultant via email. A [sample template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-time.doc) is available (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-time.doc>). Note that this template will need to be edited to address specific foods served using TPHC.

Buy American

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

- The USDA requires that an 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.
- Agricultural products, which are processed and produced outside of the U.S., may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels. This was the case with Broccoli which came from Mexico.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant 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>).

Findings and Corrective Action Needed: Buy American

Finding: The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Grape Tomatoes - Mexico
- Grapes - Peru

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. Provide the completed list as corrective action. 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>).

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 student success.

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



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