

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

School Food Authority: Praire du Chien Area Schools

Agency Code: 124543

School(s) Reviewed: Bluff View Jr. High School

Review Date(s): May 22-23, 2018

Date of Exit Conference: May 30, 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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](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 Prairie Du Chien for the courtesies extended to us during the on-site review and for being available to answer questions and provide 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. Thank-you to the Food Service Director for being available to answer questions and provide documentations as requested. A sincere thank-you to the food service staff at Bluff View as they did a wonderful job of providing quality meals and friendly service to students.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- 380 eligibility determinations were reviewed, 24 errors were identified.

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.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

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 (Step 3G) 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.

Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

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.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year.

Disclosure

- The information provided by families on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

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.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.

- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- 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

Commendations

Thank you to the Food Service Director and school nutrition professionals at Prairie du Chien Area School District. We appreciate your time spent participating in the onsite review. The staff members in the kitchen at Bluff View Intermediate School display positive working relationships and maintain a clean and orderly kitchen. One staff member in particular appears to have a great rapport with students. The fresh vegetables offered daily on the garden bar provide students with a variety of choices to encourage consumption. Staff working at the point of service on the day of review were able to quickly incorporate guidance given just prior to lunch service. Thank you for all that you do for the students of Prairie du Chien Area School District!

Comments/Technical Assistance/Compliance Reminders

Training

Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [training webpage](https://dpi.wi.gov/school-nutrition/training) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (dpi.wi.gov/school-nutrition/directory).

Production Records

- Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. They are intended to be useful tools to record information prior to production, during production, and following production.
- While the production record template in use contains space to record the essential information, the production records are not being completed for each meal.
 - Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take.
 - Milk is a required component as part of the National School Lunch Program and School Breakfast Program. You must record daily usage by milk type on your production records.
 - Continue to work with all staff members to record planned usage, actual usage, and leftovers for all meals served.
 - All foods offered should have a planned number of servings, the actual number of servings prepared, as well as the total quantity (in purchase units) required to prepare that number of servings.
 - 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 that are served in the child nutrition 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.
- A list of production record requirements (“Must Haves and Nice to Haves”) and 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>).

Crediting Documentation

- Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern.
 - A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that include these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.
 - 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 required 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 USDA *Food Buying Guide* for School Meal Programs, it may not be credited when served as part of the USDA School Meal Programs.
 - 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 (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Meal Pattern Components and Crediting

- Meat/meat alternate and grains are credited by weight in ounce equivalents (oz. eq.). Crediting for meat/meat alternate and grain products must always be rounded down to the nearest quarter (0.25) ounce equivalency. Some meat/meat alternates and grains do not credit ounce-for-ounce because they contain other ingredients, such as water, fillers, or binders. The following may be used to credit meat/meat alternates: CN labels, Product Formulation Statements (PFS), or the *Food Buying Guide*. The following documents may be used to credit grains: CN labels (if it is a combination item that also includes a meat/meat alternate), PFS, Exhibit A, or the *Food Buying Guide*.
- Fruits and vegetables are credited by volume. Crediting for fruits and vegetables must always be rounded down to the nearest 1/8 cup. Crediting and serving size information for many fruits and vegetables can be found in the *Food Buying Guide*. Some items, such as potato and tomato products, may also have a PFS.
- All items served must have a specific planned serving size, including the fruits and vegetables offered on the garden bar, and all condiments. It is up to the menu planner to designate the planned serving size for each item and communicate this to staff. Additionally, consider how the planned portion sizes may affect the point of service staff. As discussed onsite, if numerous fruits and vegetables are offered in varying serving sizes, this may complicate the task of evaluating student trays for reimbursable meals.
- In order to ensure the menu is being served as planned, all items must be weighed or measured with the appropriate standardized utensils. On the day of meal observation, juice was being poured into

cups without being measured and a spoon was the planned serving utensil for the baked beans. Technical assistance on the importance of accurate serving size measurement was provided to kitchen staff while onsite.

- The planned serving size for the pineapple offered at breakfast was ½ cup. However, a 2 fl. oz. (¼ cup) spoodle was used during service. This did not lead to any non-reimbursable meals during observation. Technical assistance was given to either use a 4 fl. oz. (½ cup) spoodle or post signage communicating that students must take two spoodles to fulfill the ½ cup serving.
- When items such as yogurt and cottage cheese are offered but not needed to meet the daily or weekly meat/meat alternate requirements, these items only add to the dietary specifications. If students enjoy these items, consider offering them on days when the entree provides only 1.0 oz. eq. meat/meat alternate. The same applies to the chips offered on the menu. If the chips credit toward the meal pattern as a whole grain, consider offering them on days when the entree offers only 1.0 oz. eq. grain. If the chips are being offered as an extra and not crediting toward the meal pattern, they still must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering these items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extra creditable foods or non-creditable foods are frequently offered. In addition, these foods also add to the cost of the meal.
- One non-reimbursable meal was observed at lunch during the onsite review due to a student selecting only ¼ cup fruit (½ a banana) and no vegetables. Consider training staff on the amount (e.g., one half, 8 pieces, 5 strips, etc.) of common fruits and vegetables needed to credit as ½ cup. A brief pre-service staff meeting may be a valuable way to communicate how the foods offered at that meal credit toward the meal pattern and what students may select for a reimbursable meal. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

Cereals Offered at Breakfast

- Several of the cereal varieties offered on the breakfast menu credit as less than 1.0 ounce equivalent (oz. eq.) of grain. These cereals must be offered in a larger serving size or bundled with other items so at least 1.0 oz. eq. of grain is offered each day to meet the daily minimum requirement for grain, and so these items can be counted as an item for the breakfast meal pattern. 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 following cereal varieties credit as less than 1.0 oz. eq. grain in the planned ¾ cup serving size: Toasted Oats, Crisp Rice, and Corn Flakes.

Meeting Weekly Requirements with Multiple Entrees

- Each entrée must be considered as a separate service line, and be evaluated for meal pattern compliance individually. Peanut butter and jelly Uncrustables with an additional 1 oz. eq. of meat/meat alternate are offered daily as an alternate meal. This meal provides 1.0 oz. eq. grain daily and 5 oz. eq. grain per week. Even when factoring in the additional grain side offered during the week of review, students choosing the Uncrustables meal daily only had access to 6.0 oz. eq. grain during the week, which does not meet the K-8 meal pattern requirement to offer at least 8.0 oz. eq. grain per week.

Offer vs Serve (OVS) at Breakfast

- Under Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered from the three components (grain [and optional meat/meat alternate], fruit/vegetable, and milk). An item is defined as 8 fluid ounces of milk; ½ cup of fruit and/or vegetable; and 1.0 ounce equivalent (oz. eq.) of

grain (and optional meat/meat alternate). Depending on how the menu is planned, a student could take a reimbursable meal without selecting the entree. Consider the following example:

1 apple (1 cup fruit = 2 food items) + 1 cup milk (1 food item) = 3 food items (1 of which is at least ½ cup fruit) = reimbursable meal.

- However, if the menu planner plans an apple as 1 food item, the above scenario requires an additional food item, in the form of a grain or fruit (or vegetable). This example illustrates the importance of the menu planner determining the number of food items that large fruit and grain items will count as prior to meal service.
- The [Breakfast Offer vs. Serve handout](#) provides many examples of reimbursable breakfasts using OVS and may be used as a training tool for staff (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf>). Visit the [Menu Planning](#) page for additional OVS guidance (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Vegetables at Lunch

- The requirement to offer vegetables from the subgroups over the week helps to ensure that students are offered a variety of nutrients and are exposed to many types of vegetables. The printed lunch menus submitted for review show that a starchy vegetable (potatoes or corn) is offered on multiple days most weeks. While there is no limit on how often a starchy vegetable may be offered, many processed potato products are higher in calories and sodium than other vegetables.
- Consider replacing some of the starchy vegetables frequently offered with vegetables from the other subgroups. This will help to keep your menu within the dietary specifications and teach students the importance of a varied intake. Refer to the [Vegetable Subgroup handout](#) for more information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>).
- The prepared and selected amounts of the non-starchy vegetables offered on the serving line at lunch during the week of review were far short of the total number of planned meals. Even though students have access to the garden bar and are not required to select a vegetable when using Offer versus Serve (OVS), it is still important to present them in an appealing way to encourage consumption, as is done on the garden bar. Consider reviewing the [Smarter Lunchrooms Movement](#) for strategies to increase vegetable consumption (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Vegetables>).

Garden Bars

- Produce on a garden bar can be credited toward the meal pattern each day that it is offered to students. Even with garden bars, the menu planner must plan a specific portion size that he or she intends students to take.
- If the fruits or vegetables on the garden bar are used to meet the weekly requirements, the planned serving sizes should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is taken. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as half of the volume served and dried fruit credits as twice the volume served.
- Production records must be kept for a garden bar and an [example template for garden bar production records](#) is found on our webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Monthly Menus

- The menu should be an accurate representation of what is offered at both breakfast and lunch. A peanut butter and jelly Uncrustable meal is offered daily at lunch, but is not included on the monthly

menu. Additionally, the monthly menu would be a great place to market the daily garden bar offered at lunch. Having a menu that shows students and parents what is included with a reimbursable should be a tool to drive meal participation.

Cycle Menus

- Using a cycle menu may ease the burden of menu planning once the cycle has been set and helps ensure meal pattern requirements are met after a compliant cycle has been planned (if served as planned). Cycle menus may also aid in purchasing if production records are reviewed and analyzed to forecast meal counts based on historical data.
- When using a cycle menu, production records can be partially completed including menu items, crediting information, and serving sizes. Photocopies can be made, or if production records are managed electronically, they can be printed and the remaining information can be completed during production and after meal service.

Second Portions

- Discontinue offering second portions free of charge to students, which increases food costs; appears discriminatory if only offered to the older students and/or boys; and increases the likelihood meals exceed the dietary specifications (calories, saturated fat, trans fat, and sodium). If students are still hungry, second entrees can be sold a la carte. Side dishes can also be sold a la carte if they meet Smart Snacks standards.

Updated CACFP Meal Pattern for Pre-K Students

- The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. 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>).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

- How to locate the agency's Child Nutrition program Report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, was reviewed. We also reviewed how to access the Aids Register, to track all program deposits made to the agency's account. The Aids Register also shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

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](#) 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 from the previous year needs to be the beginning balance on July 1 for the current year.
- 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.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](#) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- 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 our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, 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):
<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

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/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.
- 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>).

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

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>).
- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.

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) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf)

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- 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 training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

Special Dietary Needs

- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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>).
- 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. 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, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide the nutrition information from the product you will be using. For more information on [fluid milk substitutes](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- 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).

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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.
- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo [SP 56-2016](http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf) (<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>).

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

Smart Snacks

- 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>).
- 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 to assess product compliance (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). 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: 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.

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/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), Visit the [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

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.

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

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>).
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. (record any notable observations)

Time as Public Health Control

- When using "Time as a Public Health Control:"
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of this holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products
Shell eggs
Meat (beef, pork, and lamb)

Poultry
Fish
Shellfish and crustaceans

Baked potatoes
Heat-treated plant food, such as cooked rice,
beans, and vegetables
Tofu or other soy protein
Sprouts and seed sprouts
Sliced melons

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

Buy American

Technical Assistance (TA)/Compliance Reminders

- The USDA requires that a School Food Authority (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.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - The following products may be exceptions to the Buy American provision: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
 - If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted in an email.
 - Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
 - Any non-domestic product delivered to the school, without prior, written approval of the Food Service Director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
 - 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.
 - The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. 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](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) 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).

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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 Meals

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

Wisconsin School Day Milk Program

Commendations/Comments/Technical Assistance/Compliance Reminders

- Wisconsin School Day Milk Program requires the distribution of free milk to free and reduced priced students in K-5.
- Point of Service Counts (POS) for the Wisconsin School Day Program and the Special Milk Program must be recorded by who “did” take milk not by marking who “did not” take one.
- Per the Agreement in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid.

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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!

6. FINDINGS AND CORRECTIVE ACTION NEEDED

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding #1: The finding was that there were several students listed on the benefit issuance list receiving meal benefits that should not have been. There was no supporting documentation to justify meal benefits. These errors were recorded on the SFA 1 and a copy was left with the food service director.

Corrective Action Needed: Please correct this issue by contacting software company on how to manage the benefit issuance list for items such as inactive students, students that rolled over at the start of the school year and students who qualify but did not show up on the list. In addition, please notify households by sending out letters to households who did not qualify for meal benefits. **Letters were sent to households and copies were sent to reviewer. Fiscal action will be applied to errors. No further action needed.**

Finding #2: The finding was that the direct certification letters did not contain a current non-discrimination statement on it.

Corrective Action Needed: Please submit an updated letter which includes the current non-discrimination statement.

Finding #3: Online applications available to households at the beginning of the year with the USDA application for meal benefits included a notice that a discount on school fees would be provided to any household that completed a free or reduced meals application. Under USDA regulations the meals application may only be used for determining free and reduced priced benefits to children participating in the school nutrition program. Completing an application for free or reduced priced meals is completely at the discretion of the household and schools may not require or offer financial incentives for families to complete the application.

Corrective Action Needed: Please submit a detailed statement indicating the steps the district intends to take to immediately discontinue the practice of providing fee discounts in exchange for completed meal applications.

Findings and Corrective Action Needed: Verification

Finding #4: Verification letters for the verification process were not available while the reviewer was on-site.

Corrective Action Needed: Please submit copies of what letters will be used for the verification process.

Finding #5: The finding was that the reviewer was unable to confirm that a confirmation review was conducted for the verification process. There was no signature and date by the confirming official to know if the applications selected for verification had been reviewed before notifying families.

Corrective Action Needed: Please review the verification website and submit a statement on what the role of the confirming official is and when the confirmation review takes place.

Findings and Corrective Action Needed: On-site Monitoring

Finding #6: The finding was that the on-site monitoring forms were not completed for the schools as required by USDA. This includes the breakfast on-site monitoring forms.

Corrective Action Needed: Please submit an onsite monitoring form for each of the schools for lunch and breakfast. In addition, please submit a statement of the due date by which the on-site monitoring form has to be completed each year.

Findings and Corrective Action Needed: Professional Standards

Finding #7: The finding was that food service staff and non- food service staff have not completed the required training hours for the current school year. In addition, training has not been tracked on a tracking tool.

Corrective Action Needed: Please submit a tracking tool with current trainings for the food service and non-food service staff. In addition to tracking professional standards training, the food service director is required to follow through with the goals certificate and keep track of trainings on the goals tracking tool. As the director is deemed acting director currently by USDA please follow up with the DPI School Nutrition team assistant director for further guidance on the required Goals training.

Findings and Corrective Action Needed: Unpaid Meal Balance Policy

Finding #8: The finding was that the unpaid meal balance policy was not provided in a written format to families at the beginning of the school year.

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

Findings and Corrective Action Needed: Wellness Policy

Finding # 9: The finding was that the wellness policy was not updated to meet all required content. In addition, there was no documentation to show that a wellness committee met at least once annually. Finally, there was no documentation to show that the general public is made aware that they can participate on the wellness committee.

Corrective Action Needed: Please submit a statement regarding a timeline for a wellness committee to meet and review the wellness policy for updates. Additionally, please include how the general public will be invited to participate on the wellness committee.

Findings and Corrective Action Needed: Civil Rights

Finding # 10: The finding was that the computer screens display customer balances that can easily identify students who receive meal benefits.

Corrective Action Needed: Please contact the software company and submit a statement on how this will be corrected.

Findings and Corrective Action Needed: Wisconsin School Day Milk

Finding: # 11: The finding was that the WSDM program point of service is handled incorrectly. Each classroom teacher handles it differently. In one classroom it was noted the teacher took a milk count in the morning and milk was handed out in the afternoon. This is not correct as milk should be marked off as students takes it. It was also noted that three months of reports were missing to support the annual claim for the prior year for the WSDM program.

Corrective Action Needed: Please submit a statement on how the process will be corrected in each of the classrooms. Please contact software to assist in finding reports.

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

Finding # 12: The finding was the non-program food revenue tool was not completed.

Corrective Action Needed: Please submit a non-program food revenue tool.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- **Meal Pattern Finding #1:** The production records submitted for the week of review showed many of the quantities offered were short of the meal pattern quantity requirements.
 - A. There was a daily grain shortage at breakfast on all days during the week of review. The serving size of many cereals being offered each day credits as less than the minimum daily requirement of 1.0 oz. eq. grain.
 - B. There was a weekly grain shortage at breakfast for the week of review. Since the daily grain requirements were not met each day during the week due to the serving size of the cereal, the minimum amount of grain offered was only 2.75 oz. eq., which is short of the weekly requirement to offer K-8 students at least 8 oz. eq. grain.
 - C. There was a daily fruit shortage at breakfast on Monday of the week of review. The production record shows that only 4 fl. oz. of juice was offered. All grade groups are required to be offered 1 cup of fruit at breakfast.
 - D. There was a daily vegetable shortage at lunch on three days (Tuesday, Wednesday, and Friday) during the week of review. The production records submitted for the week of review show that only $\frac{1}{2}$ cup of vegetable was offered each day, short of the $\frac{3}{4}$ cup requirement for K-8 students. While onsite, it was determined that additional vegetables are offered daily on the garden bar. However, since production records were not being kept for the garden bar, those vegetables cannot credit toward the meal pattern.
 - E. There was a weekly vegetable shortage at lunch for the week of review. Production records show that only $3\frac{3}{8}$ cup vegetables were offered, short of the weekly requirement to offer at least $3\frac{3}{4}$ cup. Again, since production records were not kept for the garden bar, those vegetables offered cannot credit toward the meal pattern.
 - F. There was a red/orange vegetable subgroup shortage at lunch for the week of review. Production records show that only $\frac{1}{2}$ cup of carrots was offered, short of the requirement to offer at least $\frac{3}{4}$ cup vegetables from the red/orange subgroup over the week.
 - G. No vegetables from the beans/peas (legumes) subgroup were offered at lunch during the week of review, resulting in a missing subgroup for the week.
 - H. There was a weekly grain shortage at lunch during the week of review. The Uncrustable sandwich offered as a daily entree option at lunch provides 1 oz. eq. grain. A student would be able to select this entree option each day of the week, resulting in a total of 5 oz. eq. grain offered over the week. Even with the additional crediting from the Seasoned Noodles side (1.0 oz. eq.) offered during the week of review, the minimum grains offered were short of the requirement to offer at least 8 oz. eq.

Repeat violations of a daily grain shortage, weekly grain shortage, daily fruit shortage, daily vegetable shortage, weekly vegetable shortage, vegetable subgroup shortage, and missing subgroup during subsequent Administrative Reviews may result in fiscal action.

Corrective Action Needed: Please submit the following by the first corrective action due date:

- A. A statement explaining how you will ensure that the serving size for all grain items offered at breakfast credit as at least the 1.0 oz. eq. daily grain requirement for K-8 students.
- B. A statement explaining how you will change your current breakfast menu to ensure the weekly grain requirement to offer at least 8 oz. eq. grain to K-8 students is met. Submit an example weekly breakfast menu and any product documentation for items added to the menu.

- C. While onsite it was determined that the daily fruit shortage was the result of incomplete production records rather than not offering the required daily amount of fruit. Corrective action for this meal pattern shortage will be assessed on the submission of completed production records (see production records finding below).
- D. The daily vegetable shortages were the result of not maintaining garden bar production records rather than not offering the required daily amount of vegetables. Submit a planned garden bar production record with the items typically offered and the planned portion sizes.
- E. See corrective action for D. above.
- F. See corrective action for D. above.
- G. A written statement of how you will modify this menu week to offer at least ½ cup of vegetables from the beans/peas (legumes) subgroup.
- H. A written statement explaining how you will bring the Uncrustable meal into compliance with the weekly grain requirement for K-8 students. Submit product documentation for items added to this meal.

- ❑ **Meal Pattern Finding #2:** Many grain items offered during the week of review and onsite meal observation are not whole grain-rich (WGR). These include the Crisp Rice cereal, Corn Flakes cereal, Bunch O' Krunch cereal, Sugar Frosted Flakes cereal, long john donuts, frozen waffles, and egg noodles.
 - 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.
 - The terms "wheat" or "made with whole grains" on a product label do not necessarily mean that a product is whole grain-rich. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as whole grain-rich. Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients. Note, a recipe that includes 50 percent whole grain and 50 percent enriched grain by weight is considered whole grain-rich. USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

Corrective Action Needed: Submit a statement explaining your plan to offer only WGR items going forward. Submit product labels for any replacement items added to the menu. Submit this by the first corrective action due date.

- ❑ **Meal Pattern Finding #3:** The production records submitted for the week of review were missing essential information. Additionally, production records were not being kept for the garden bar, which contributed to meal pattern shortages.

Corrective Action Needed: Submit two weeks of breakfast, lunch, garden bar, and condiment production records from the first two full weeks of the 2018-2019 school year showing all essential information is being recorded. Please refer to the above technical assistance and the production records "[Must Haves](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf)" list for what is required to be included on the production records (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>).

- ❑ **Meal Pattern Finding #4:** Incomplete product documentation was submitted prior to the onsite review. The Public Health Nutritionist was able to credit the remaining items while onsite using product packaging. Additional product documentation is being kept onsite, but is not complete and has not been updated.

Corrective Action Needed: Submit a statement specifically explaining your plan to update and maintain all product documentation for items served as part of the National School Lunch Program and School Breakfast Program. Submit this by the first corrective action due date.

- ❑ **Meal Pattern Finding #5:** No standardized recipes were submitted for the week of review and were not in use on site. The use of standardized recipes is an important part of school meal programs. Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. There are many resources on our website regarding recipe standardization to reference as you develop your standardized recipes. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the [Standardized Recipes](http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>). We encourage viewing the webcast, [What's the Yield with Standardized Recipes?](http://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

Corrective Action Needed: Submit a standardized recipe for the following menu items served during the week of review: Seasoned Noodles, Turkey Sandwich, and Cheeseburger. Submit this by the first corrective action due date.

- ❑ **Meal Pattern Finding #6:** No signage was posted at breakfast to explain what constitutes a reimbursable meal to students. Additionally, there was a great deal of confusion over how the menu is planned and what students were able to select during meal observation. Clear breakfast signage would help to alleviate confusion. Lunch signage was posted, but did not communicate that the peanut butter and jelly Uncrustable meal was being offered. Lunch signage was also missing the OVS language explaining that students must select at least three full components, one of which being at least ½ cup fruit, vegetable or combination.

Corrective Action Needed: Submit a photo of posted breakfast signage that has been filled in for breakfast service. Submit a photo of the lunch signage that has been updated with the necessary language. Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage). If you are interested in ordering signage from SNT, please visit the [Team Nutrition](http://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form. Submit this by the first corrective action due date.

- ❑ **Meal Pattern Finding #7:** Additional training is needed for the Food Service Director and school nutrition professionals on topics related to the National School Lunch Program and School Breakfast Program, such as the breakfast meal pattern, the lunch meal pattern, crediting, serving sizes, OVS, production records, and standardized recipes.

Corrective Action Needed: Submit a copy of class registration for any staff attending the School Nutrition Skills Development Courses (SNSDC) this upcoming summer. Submit a proposed plan for

Food Service Director and staff training in preparation for the next school year. One training topic must be OVS. Submit your registration and tentative training plan by the first corrective action due date. Submit a copy of any training certificates and staff training rosters by the second corrective action due date.

Smart Snacks

Findings and Corrective Action Needed: Smart Snacks

Smart Snacks Finding #1: Products that are not Smart Snacks compliant are being sold to students during the school day and during meal service.

- A vending machine was located in the cafeteria. It was turned on and students were observed making purchases during the school day. The 15.2 fl. oz. juice and the flavored water stocked in the vending machine do not meet the Smart Snacks beverage standards.
- If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group.
- A student was observed selling candy to other students during breakfast on the day of review. The candy did not meet the Smart Snacks standards and therefore could not be sold during the school day without being an exempt fundraiser. Furthermore, since the candy was not be Smart Snacks compliant, it should not be sold in the cafeteria during meal service.

Corrective Action Needed: Submit a written statement on how the school will bring all foods and beverages sold to students during the school day into compliance with the Smart Snacks regulations. Include the name(s) of those who will be responsible and a proposed timeline. Submit this by the first corrective action due date.

Buy American

Findings and Corrective Action Needed: Buy American

Buy American Finding #1: The following products were identified in SFA's storage area as non-domestic and the SFA is not maintaining a Buy American – Noncompliant List:

- Bananas - Columbia
- Mandarin oranges - Indonesia and China
- Cherry tomatoes - Mexico
- Grapes - Chile
- Canned mushrooms - Spain
- Olive Oil - Italy

Corrective Action Needed: Begin using a Noncompliant Product List for tracking non-domestic products. Submit a copy of the completed form for the above noncompliant products found during the onsite review. 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>).