

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

School Food Authority: Belleville School District

Agency Code: 13-0350

School(s) Reviewed: Belleville Intermediate

Review Date(s): 5/16/18-5/17/18

Date of Exit Conference: 5/17/18

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 Belleville School District for the courtesies extended to us during the on-site review. All were 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 onsite portion of the review. The food service director works very hard to maintain a stellar food service program—her efforts are commended.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)

197 eligibility determinations were reviewed, no errors were identified. Great job!

Applications

- Template notification letters, including the Direct Certification approval and application approval/denial letters are updated each year on the [DPI Free and Reduced website](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#notification-letters) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#notification-letters>). Templates should be updated in your software system.
- Children are eligible for free or reduced price meal benefits on the date their application is determined complete and unambiguous by the Determining Official. The effective eligibility date for Direct Certification is the date of the output file.
- The School Nutrition online contract must match what is happening within the district. If changes are made after the original approval, adjustments must be submitted. This includes free and reduced officials and meal and milk pricing.
 - **Determining Official** reviews the initial free/reduced-price meals applications, determines if the students are eligible for free or reduced-price meals, and notifies the household of the determination.
 - **Verifying Official** conducts the verification process including the selection of applications, notification of selection for verification, examination of materials submitted and notification of the results. The Verification Official must also submit the Verification Collection Report to DPI. The Verifying Official **may** be the Determining Official.
 - **Confirming Official** conducts a review of the information on the applications selected for verification to confirm that the correct determination of eligibility was initially made. If necessary, this person corrects the eligibility determination prior to completing the verification process. The Confirming Official **may not be** the same as the Hearing Official or the Determining Official.
 - **Hearing Official** may be called upon to hear possible complaints or appeals on application determination or verification process results and possible discrimination in the operations of the program. The Hearing Official **should not** be a subordinate of the person serving as either the Determining Official or the Verifying Official. The Hearing Official **may not be** the same person as the Determining Official or the Verifying Official or the Confirming Official.
- Thank you for sending letters to households reminding them to re-apply before carryover benefits end. This is not a requirement, but it is a courtesy to households and helps reduce unpaid meal charges. Remove language in the template which provides 10 calendar days to appeal before changing carryover benefits. Households *do not* have a right to appeal a

discontinuation of benefits *due to the expiration of the carryover* because no eligibility determination was made during the current school year.

Public Release

All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc) before the start of the school year (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc>). The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must annually distribute the Public Release to:

- Local news media
- Grassroots organizations (local organizations providing services to populations in need)
- Major employers contemplating or experiencing large layoffs
- Local Unemployment Office (as applicable)

SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Verification

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

- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases as a result of verification or audit, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- *Prior* to sending the “We Must Check” letter, a confirming official must review each approved application selected for verification to ensure the initial determination was accurate. The confirmation review must be done by an individual other than the individual who made the initial eligibility determination.
- Once the documents submitted by the household have been reviewed, the agency should send the “[We Have Checked Letter](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-we-have-checked-1718.docx)” notifying them of the result (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-we-have-checked-1718.docx>).

Findings and Corrective Action Needed: Verification

- Finding #1:** the Verification process was completed after November 15th and the sample application was verified incorrectly. Despite incorrect verification and lack of adverse action, the household later matched to Direct Certification as the same eligibility status.

Corrective Action Needed: Watch the [Verification process](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html) webcasts on the SNT website (https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html; <https://media.dpi.wi.gov/school-nutrition/submitting-the-verification-collection-report/story.html>). Submit the date of completion to the consultant. By completing this training in combination with the technical assistance provided onsite, the expectation is that the verification process will be completed correctly moving forward.

- Finding #2:** the public release was not distributed. This is an annual requirement.

Corrective Action Needed: Submit a statement outlining where the agency will send the 18-19 SY public release.

Meal Counting and Claiming

Comments/Technical Assistance (TA)/Compliance Reminders

- Work with Skyward to pull the correct attendance factor and highest enrollment onto the accuclaim report. This will make monthly claim reporting more efficient.
- A district employee must review and sign off on all monthly edit checks prior to online submission. The district must also conduct the onsite monitoring visits in conjunction with the FSMC.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding:** Systemic NSLP and SBP claim consolidation errors. The agency is using the participation data report rather than the edit check report. The meal counts differ between the two reports.
 - Separate the Elementary and the Intermediate schools for edit checks and site based claiming. For the 17-18 SY, DPI recognizes these sites as two schools. In the 18-19 SY, should this change, ensure each DPI recognized school has the ability to run a site-based edit check in the software system.
 - Site 60, which is a nonreview site, was found to have an overclaim in NSLP and SBP
 - Site 40, which is a nonreview site, was found to have an underclaim in NSLP and SBP

Corrective Action Needed:

- a) Submit the May, 2018 accuclaim reports district-wide once the claim has been filed online to document the entire claiming process has been fixed.
- b) Submit edit check reports for the SBP and the NSLP for the months of September 2017- April 2018. *Fiscal action will be calculated on the review and non-review sites.*

Part B completed onsite. No further action required for this piece.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director and school nutrition professionals at Belleville School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. Though newer to the role, the Food Service Director is doing a great job and shows enthusiasm to continue to learn! Offering a vegetable daily at breakfast in addition to fruit is a great way to teach children that vegetables can be a part of every meal. Additionally, placing your self-serve Fruit and Vegetable Bar at the beginning of the lunch line encourages students to make them a priority. Thank you for all that you do for the students of Belleville School District!

Comments/Technical Assistance/Compliance Reminders

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production.

- The actual number of reimbursable and non-reimbursable meals is required to be recorded on the production record for each meal.
- If the number of actual servings prepared differs from the planned number of servings, make note of that on the production record.
- The production record template in use is missing a space to record the total number of purchase units prepared. All items should have a total number of servings prepared, as well as the total number of purchase units required to prepare that number of servings.
- All items served with a reimbursable meal should be recorded on the production record, even if they are served as “extra” items and not crediting toward the meal pattern.

- Milk is a required component as part of the National School Lunch Program and School Breakfast Program. You must record actual usage by milk type on your production records for each meal.
- Be specific on production records about the identity, brand, and description of the items served. Instead of “cereal”, list all varieties of cereal served at that meal separately. Include the case counts for fresh fruit when it is offered.
- When an item is a component of a standardized recipe, it does not need to be listed separately on the production record. For example, since the cheese sauce is included in the Beefy Nachos recipe, it does not need to be listed separately on the production record.

Standardized Recipes

A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. A few of the recipes submitted for the week of review offered two ways of preparing the menu item. Consider noting which method you are using in your kitchen on those recipes to ensure they are always prepared as intended.

Offering Multiple Entree Options

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entree option, each entree option offered is viewed as one “line” and therefore needs to meet the daily and weekly requirements. Keep this in mind when totaling the crediting information on the production records. The crediting for the multiple entrees should be considered independently instead of summed together for each day.

Offer vs Serve (OVS) at Lunch

Two non-reimbursable lunches were observed on the day of meal observation. Both contained only two full components. One non-reimbursable meal consisted of foods from the meat/meat alternate and vegetable components, with the student selecting chili, potatoes, and green peppers. The second non-reimbursable meal also consisted of foods from the meat/meat alternate and vegetable components, with the student selecting chili, potatoes, and spinach. Additionally, one student had a reimbursable meal at the point of service, but was sent back to select chili. Additional OVS training is encouraged for your staff, especially at the beginning of next school year. The School Nutrition Team has an [Offer versus Serve webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) that may be used for training (https://dpi.wi.gov/school-nutrition/training/webcasts#ovs).

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). Students must select at least three food items for a reimbursable meal, with one being at least ½ cup fruit, vegetable, or a combination. Depending on how the menu is planned, a student could take a reimbursable meal without selecting the entree. Consider the following examples:

½ cup baby carrots (1 food item) + 4 fl. oz. juice (1 food item) + 1 cup milk (1 food item) = 3 food items (1 of which is at least ½ cup fruit) = reimbursable meal

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

However, if the menu planner plans the apple as 1 food item, the above scenario requires an additional food item. This example illustrates the importance of the menu planner determining and communicating 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). The language regarding what a student must select for a reimbursable breakfast in the student handbook should be updated to accurately explain what students may select as part of a reimbursable breakfast.

Menu

Your menu should be an accurate representation of what you plan to serve at both breakfast and lunch. Production records submitted for the week of review showed that juice was offered at breakfast each day of that week and cheese sticks were offered as part of select entree options. However, the breakfast menu did not reflect this. Having a menu that shows students and parents what is included with a reimbursable is a great tool to drive meal participation.

Additionally, it may be of benefit to consider what students are being served over the course of the day. For example, during the week of review a cinnamon roll was offered as a breakfast entree option and was also offered with one of the entree options at lunch.

Dietary Specifications

The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined sodium limits using three targets, allowing for a gradual implementation. Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, olives, and processed food items. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years.

While sodium is assessed as a daily average for a 5-day week, meals made up of many high sodium items, such as the cheeseburger, tator tots, pickle, and condiments contribute greatly to that average. Additionally, consider using spices other than salt to season cooked vegetables, such as the roasted cauliflower.

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Consider promoting correct serving sizes by adding signage at the condiment station with a photo of what one tablespoon of Ranch dressing looks like or using signage such as “One squeeze, please!” on self-serve squirt bottles.

Cinnamon rolls were offered with the chili served at lunch on the day of review. Some students who selected the other entree were observed to also take a cinnamon roll. Consider adding signage to your serving line to communicate what items students may select. This will help to ensure that the dietary specifications based on the planned menu are being met.

Breakfast Promotion

It is great to see that Belleville School District offers the School Breakfast Program. However, there is an opportunity to improve the breakfast participation rates. The district and staff may want to consider a change in breakfast model to increase participation.

Breakfast in the classroom is associated with the highest participation rates, which can be as high as 98 percent of the school's enrollment, and works best in elementary schools. Other service methods, such as breakfast after first period, correlate with increases as much as 15-40 percent of current participation. Perhaps if breakfast were built into the school day, like lunch, rather than being offered before the school day begins, more students would participate. Greater participation equates to more students being ready to learn, as well as higher levels of government reimbursement, which results in more revenue for the school.

Refer to the [Serving Up a Successful School Breakfast Program](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf) guide for an in-depth look at the various School Breakfast service models to determine which one(s) may work in your schools (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf>). Find additional information on breakfast, including meal pattern and menu planning tools, on the [School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) webpage (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>). Please contact our School Breakfast Specialists Tracy Huffman, MS, RDN, CD at tracy.huffman@dpi.wi.gov and Hannah Snider, MPH, RDN, CD at hannah.snider@dpi.wi.gov for additional guidance.

In-house Yield Study

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the school food authority's next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the Food Buying Guide (FBG), or if a specific food item or size is not currently listed in the FBG (e.g. 113 count apples). [Specific and verifiable procedures](#), which must be followed, are available on the [Menu Planning webpage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf>; <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- Meal Pattern Finding #1:** There was a daily fruit shortage at lunch on two days (Monday and Tuesday) during the week of review. The production records show that only $\frac{1}{4}$ cup of fruit was offered on each of these days, which is short of the $\frac{1}{2}$ cup requirement.

Repeat violations of a daily fruit shortage during subsequent Administrative Reviews may result in fiscal action.

Corrective Action Needed: Submit a written statement explaining how you will bring the quantity of fruit offered at lunch each day into compliance with the meal pattern.

- Meal Pattern Finding #2:** No more than 2.0 ounce equivalents (oz. eq.) of grain-based desserts can be offered per week at lunch. Grain-based desserts contribute towards the weekly grain-based dessert limit regardless of whether they are whole grain-rich or not. Grain-based desserts served

as “extras” must also be taken into consideration when assessing the total amount of grain-based desserts offered over the week.

A total of 2.25 oz. eq. of grain-based desserts were offered during the week of review:

- Cinnamon roll, crediting as 2 oz. eq. grain
- Chocolate chip cookie, crediting as 0.25 oz. eq. grain using Exhibit A

Although the chocolate chip cookie was not intended to credit toward the grain component for the week of review, it must still be considered for the grain-based dessert limit at lunch.

Corrective Action Needed: Submit a written statement explaining how you will bring this week into compliance with the grain-based dessert limit for lunch.

❑ **Meal Pattern Finding #3:** 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 wheat crackers offered with the Munchable meal are not WGR. 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 written statement explaining how you will bring this meal into compliance. Please submit product documentation and labels for any products added to the menu.

- *Staff identified 2 non-reimbursable lunches while watching lunch service. Both trays only had 2 full components. These will be included in the NSLP fiscal action calculation.*

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

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

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other) 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](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- Refer to the [expenditure categories](#) when completing the AFR (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc>).

Allowable Costs

Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found on our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding #1:** The Annual Financial Report was not completed correctly. Costs are lumped under NSLP and purchased services. Costs must be separated into labor, foods, equipment, purchased services, and other *by program*. The FSMC fee should be the only FSMC-related expense under purchased services in addition to food safety inspections, and services like equipment repairs.
Corrective Action Needed: Correctly allocate the 16-17 SY expenses and re-submit the report via email to the consultant. Copy the DPI accountant jacqueline.jordee@dpi.wi.gov on the communication. The adjustments will need to be entered manually.

❑ **Finding #2:** Documentation necessary to complete the comprehensive NPSFA and nonprogram foods reviews could not be obtained onsite.

Corrective Action Needed: Submit the following documentation and responses:

- WUFAR ledger showing revenue receipted to Fund 50 for the catered event on 12/29/16. Inv #4018 in the amount of \$413.50.
- Explain how the agency ensures only allowable costs are charged to the food service account.

Paid Lunch Equity (PLE)

The agency is in compliance. Minor technical assistance was provided on data entry to the report tab.

Revenue from Nonprogram Foods

Nonprogram Food costs and revenues must be separated from Program food costs and revenues. The 16-17 SY AFR did not properly separate program and nonprogram food expenses by category. The AFR will be updated to fix this error per the corrective action outlined under the NPSFA above.

- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

Civil Rights Training

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

Civil Rights Self-Compliance Form

The [Civil Rights Self-Evaluation Compliance](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>).

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.

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 practitioner*. 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.

Processes for complaints

- 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 5 days.
- 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 Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

- Finding #1:** The authorized representative did not complete USDA civil rights training.

Corrective Action Required: Review the [USDA Civil Rights PowerPoint](#) posted on the SNT website. Submit the date of completion to the consultant (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>).

- Finding #2:** The [Civil Rights Compliance Form PI-1441](#) was not completed (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

Corrective Action Required: Complete the form and submit to the consultant. Moving forward, this form must be completed each school year by October 31.

- Finding #3:** The free and reduced approval/denial letters, and verification letters contain the incorrect non-discrimination statement.

Corrective Action Required: Update the above template or begin using the DPI SNT templates. Submit updated copies to the consultant.

Food Service Management Company (FSMC)

As a reminder, the following duties may not be delegated to the FSMC:

- Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal

claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year. It is due February 1 annually and the documents are kept onsite.

- Signature Authority –a representative of the SFA must sign off on the contracts for the SFA
- Edit Checks- an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software

On-site Monitoring

Commendations/Comments/Technical Assistance (TA)/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; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](#) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

Food Service Management Company (FSMC)

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 - Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year. It is due February 1 annually and the documents are kept onsite.
 - Signature Authority –a representative of the SFA must sign off on the contracts for the SFA
 - Edit Checks- an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software

Local Wellness Policy

Technical Assistance (TA)

- Belleville SD recently updated and approved the LWP. As a reminder, the final rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](#) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy webpage](#) (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the [Wisconsin Health Atlas webpage](#) (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP (<http://wellsat.org/>).

Smart Snacks in Schools

Commendations

It is great that all a la carte options are checked for Smart Snacks compliance with Alliance for a Healthier Generation's [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) (<https://foodplanner.healthiergeneration.org/calculator/>). Your practice of offering a limited selection of a la carte options after the reimbursable lunch has been offered is a smart strategy. Additionally, the school store that was operating during breakfast observation only sold non-food items, which does not take away from breakfast participation rates.

Technical Assistance

As a reminder, all food and beverages must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Only the entrée of a SBP or NSLP meal is exempt from the Smart Snacks Standards. Therefore, the serving or selling of a bundled complete second meal is not allowed since a complete meal would exceed the Smart Snack Nutrition Standards. Entrees may be sold a la carte without having to meet the Smart Snack standards on the day of or the day after it is served as part of a reimbursable meal. Snack items and side dishes have to individually meet the Smart Snacks standards in order to be sold a la carte.

Professional Standards

Technical Assistance (TA)

Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).

Food Safety, Storage and Buy American

Commendations/Comments

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Buy American

Comments/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](#) 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](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Summer Food Service Program (SFSP) Outreach
Keep up the good work!

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Comments/Technical Assistance (TA)/Compliance Reminders

Point of Service Counts for the Wisconsin School Day Program must be recorded **as the student receives the milk**. Inaccurate counting systems can result in fiscal reclaim.

Findings and Corrective Action: Wisconsin School Day Milk Program

Finding #1: The agency was unable to provide documentation to support that milk served for the WSDMP is “WI produced”. This means that all or some of the *raw* milk used by the milk processor was produced in WI.

Corrective Action Required: Follow-up with your milk distributor and obtain a statement outlining where your raw milk is produced. Submit this record to the consultant.

Finding #2: The district’s paper contract completed in 1990 no longer reflects current practices and administration.

Corrective Action Required: Submit an updated WSDMP PI-1464 contract to the consultant.

Finding #3: Students for one classroom were observed obtaining milk from the cafeteria milk cooler without a proper point of sale that is supervised by an adult.

Corrective Action Required: Submit a statement explaining how the point of sale will be corrected.

Special Milk Program

Technical Assistance (TA)

Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk may not be served. Children one year old should be served unflavored whole milk. **Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk.** Discontinue serving skim chocolate milk. The Smarter Lunchrooms Movement has strategies to [encourage the consumption of unflavored milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

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).



With School Nutrition Programs!