

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

School Food Authority: Cambridge School District

Agency Code: 130896

School(s) Reviewed: Cambridge High School

(Cambridge Elementary for Wisconsin School Day Milk Program only)

Review Date(s): 2/20-22/18

Date of Exit Conference: February 22, 2108

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 Cambridge School District 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.

It was very apparent that the staff at Cambridge High are very dedicated to their student’s success and there is strong administrative support for the school meal programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

149 eligibility determinations were reviewed, source documentation for one application could not be located one application needs to be followed up on.

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.
- 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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- When a household submits an application with a case number, the name of the program the case number is for is also required. Medicaid programs, such as Badgercare, cannot be approved through an application, only direct certification. If this is the case, income would be required to approve the application.

Annual Income

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

Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically. If done through software, please check that the income levels are updated each year after July 1.

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 that 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 with the household. 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.
- The DPI prototype letters are strongly encouraged to be used. This will ensure all required information is included in the notification and verification letters sent to households.

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.
- A list of students confirmed as homeless by the homeless coordinator was available for review. These forms did not include a date of receipt in the food service dept. It is recommended these are date stamped to indicate the date eligibility begins for the school meal programs. It was discussed that eligibility begins the day the food service department is notified, not the date the student is deemed homeless, so effective communication with the homeless liaison is important.

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.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.
- Cambridge School District did send this out to local media, but no grassroots organizations. If there are any in the community that would meet this criteria, they can also get the word out about the school meal program at your schools.

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.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- 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>).
- 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.
- There were no students in the district in need of these services at this time.

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.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

Transferring Students

- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility.

Disclosure

- The information provided by the family 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, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** Supporting documentation for eligibility was not available for 3 students.

Corrective Action Needed:

Since there is no supporting documentation on file for these students, their eligibility status is required to be changed to paid 10 days after the adverse action letter is sent to the household by the school district. A template letter will be provided. Provide the date the eligibility was updated or corrected on the SFA-1 form left onsite and scan and submit for corrective action.

- ❑ **Finding #2:** One free and reduced application was approved with a case number, but no program name listed.

Corrective Action: Please contact the household and determine the program name associated with the case number.

- ❑ **Finding #3:** The free and reduced eligibility notification letters and directly certified letters sent to households are all missing required information. It is strongly recommended that the DPI School Nutrition Team letters are utilized. The Eligibility Manual includes the required information. Our template letters are located here: [Free and Reduced Price Meal Applications and Eligibility | Wisconsin Department of Public Instruction](#)

Corrective Action Needed:

Indicate how this will be corrected moving forward, either by using the template letters on the school nutrition website or by updating your letters will all required information. Please provide a sample of the updated letters you will be using moving forward.

- ❑ **Finding #4:**
The district has a sharing information form available on their website which correctly identifies specific programs that the information will be shared with. The electronic application only allows households to choose from “district programs”. Households need to know which programs they are sharing their information with and needs to be specific.

Corrective Action Needed:

Update the electronic application with the same program information that is used on the other sharing form. Provide a copy of the updated sharing information section of the online application.

❑ Finding #5:

A district staff member may have access to student level eligibility information only if there is a legitimate need to know, such as state reporting and school meal claims. The Eligibility Manual on pages 83-95 discusses disclosure procedures and requirements.

Corrective Action Needed:

Please review each individual with access to student level eligibility information and provide an updated list of SFA staff who will be given access to this information. This is ultimately the SFAs decision when determining who has a legitimate need to know, but this information should be limited to as few individuals as possible.

Note: aggregate data (just F/R numbers or percentages without a connection to individual names does not require prior parental sign-off before sharing and often times satisfies the request).

❑ Finding #6: Anyone working outside of school food service that has access to student level eligibility information is required to have a disclosure agreement on file. This includes individuals who receive specific student's information after parental consent is provided through the sharing information form.

Corrective Action Needed:

Submit copies of the signed [disclosure agreement form \(https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure\)](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) for anyone working outside of food service, who is determined to need access to this information (e.g., IT, secretaries handling local fee waivers, staff handling state/federal reporting individual F/R data). The goal is to limit the number of people who need to know this information and make sure these individuals understand the consequences of improper sharing/release of this information.

❑ Finding #7: The Authority Contacts listed within the School Nutrition online contract does not reflect who are responsible for these duties within the district. This includes the determining official, the confirming official and the verification official.

Corrective Action:

Please review each person listed and update the School Nutrition online contract as appropriate per job description and duties. Provide a screen shot of the updated contract contact page.

Verification

Technical Assistance (TA)/Compliance Reminders

- Applications that may be selected for verification are any on file as of October 1 of the current school year. Applications from the prior school year and currently still receiving benefits due to the 30 day carryover do not qualify for verification.

- 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.
- The verification process needs to be completed by November 15th and the Verification Collection Report is due February 1 annually.
- All staff involved in the verification process are strongly encouraged to watch the verification webinars on our website <https://dpi.wi.gov/school-nutrition/training/webcasts#verif> and attend the Free and Reduced/Verification class over the summer.
- There is a [verification tracker](#) form on our website that will be helpful in keeping track and documenting each stage of verification (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>).

Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** When the application was selected for verification this year, a household who did not have a current application on file for the current school year was selected. Instead of verifying their information, they submitted a current application that was then processed. Therefore, verification was not completed as required.

Corrective Action Needed:

Verification still needs to be completed since an incorrect application was selected. Please select a new application to verify, that was on file for the current school year by October 1. You are encouraged to contact Skyward regarding training on their software’s ability to assist with the verification process including application selection and the verification report. Please provide the outcome of verification process once complete.

- ❑ **Finding #2:** Since verification was not completed correctly, the verification collection report needs to be updated to reflect what actually occurred.

Corrective Action Needed:

Please notify the household and give them time to reply. If they respond by March 1, the verification collection report will be updated to reflect the outcome of this verification. If they don’t respond by March 1, the verification report needs to be updated to reflect that verification was “not completed”. The report will be unlocked so it can be modified.

- ❑ **Finding #3:** The verification notification letters did not include all required information.

Corrective Action Needed:

Indicate how this will be corrected moving forward, either by using the [template letters](#) on the school nutrition website or by updating your letters with all required information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>). Please provide a sample of the updated letters you will be using moving forward.

Meal Counting and Claiming

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

- Cambridge School District Board has requested that the point of service be at the beginning of the line to ensure all students are notified on negative or low balances prior to receiving a meal. In these situations, a reimbursable meal is charged prior to the student receiving a meal. To allow this, someone must be at the end of the serving line to ensure all students receive a reimbursable meal. It was discussed how this would occur if a student refused to take a reimbursable meal. Staff know their students well and will be communicated with Jessica so she can make an update to the students account. Please continue to ensure all staff are trained and knowledgeable on how to handle this if occurs.
- An edit check is required to be completed by site each month prior to the claim submission and this report is what is required to be used for all claims. For Skyward, this is the Accuclaim report, not the Participation report.
- 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.

There were no finding in this section, the January claim was submitted correctly for NSLP and SBP.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the FSD, business manager, and principal for the warm welcome to Cambridge High School. We appreciate your availability during the on-site portion of the review. Thank you to the FSD for sending documentation prior to the on-site review.

The cafeteria at CHS is an appealing and friendly place for students to eat and learn. Nutrition professionals in the cafeteria provide friendly and personal service to students. The salad bar is a nice offering.

Comments/Technical Assistance/Compliance Reminders

- 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>). Contact Erin Opgenorth (erin.opgenorth@dpi.wi.gov) or Tanya Kirtz (tanya.kirtz@dpi.wi.gov) with any questions
- It is recommended that anyone involved with the school meals program attend DPI training classes. Classes are offered in the summer and selected other times throughout the year. Numerous webcast training sessions are also available online. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the USDA requirements for the

federal nutrition programs including verification, free/reduced applications, menu planning, production records, and record keeping requirements. Information on summer classes will be sent to School Food Authorities in late spring and is also available on the [DPI training](https://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training). Contact Molly Gregory (molly.gregory@dpi.wi.gov) with training questions.

- The breakfast production record template shows that breakfast is planned for 6-12 grade, which is not a grade group. You may plan for grades 6-8 in addition to 9-12. It may be beneficial to simplify to a K-12 meal pattern for all students. A K-12 breakfast meal pattern makes menu planning easier for school nutrition professionals.
- At this time USDA is not enforcing maximum limits for grains. The week of review a maximum of 17.5 oz eq grain could be selected by students. Be aware that this does exceed the recommended weekly grain maximum of 12 oz eq.
- Meat/meat alternate (M/MA) is credited by weight, not by fluid ounces. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving of ground/diced/shredded meat. Fluid ounces are a volume measure, while ounces are a weight measure. To ensure that students are receiving the adequate amount of meat/meat alternate, weigh the meat/meat alternate, then determine which scoop will hold that weight of meat.
- Crediting updates:
 - Gyro beef: 10# = 160 oz. If 2.03 oz of beef is 2 oz eq, 160 oz is 157.63 oz eq. $157.63 \text{ oz eq} / 40 \text{ servings} = 3.94$, which rounds down to 3.75 oz eq M/MA per serving, NOT the documented 4 oz eq M/MA.
 - R/O in Lasagna: 1x #10 can = 24x 1/2c servings, or 12 cups. $12 \text{ cups} / 24 \text{ servings} = \underline{1/2c \text{ R/O vegetable per serving}}$, NOT the documented 5/8 cup.
 - Podded peas (eg, snow peas) credit towards other vegetables. Peas without pods credit towards starchy vegetables.
- All food must be recorded on production records to credit toward the meal pattern. Otherwise, it cannot be confirmed that a food was served.
- A teacher was observed collecting daily breakfast for 2 students who do not come to the cafeteria for breakfast. Students in grades 9-12 must be served in OVS style. It is strongly encouraged to find a time that these students would be able come to the POS and select their own reimbursable meal. Alternatively, the teacher collecting the meal for them must ask each student what items they would or would not like so that the student has the option to select or deny certain components.
 - Acceptable documentation is required to allow for accommodations made to reimbursable meals (eg, signed medical statement, IEP, IHP). For example, a signed medical statement that says a student is unable to collect their meal, and a staff member may do so instead, overrides the meal pattern and OVS requirement. It is crucial for the SFA to have up-to-date documentation on file and for the FSD to have access to it.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

****** Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.

****** **Finding #1: Weekly vegetable sub-group shortage**

During the week of review, ½ cup of marinara sauce (1/10) and 1/8 cup tomato sauce (1/9) was served. However, Chicken Patty and Uncrustable entrees are also available without access to marinara sauce. Between 1/8 and 5/8 cup red/orange vegetables was offered during the week of review. All high school students must have access to 1-1/4 cup of red/orange vegetables weekly.

Corrective Action Needed for Finding #1: Please submit a written statement explaining how students will be offered the required minimum of 1-1/4 cup red/orange vegetables weekly (to be verified upon submission of CA #7).

****** **Finding #2: Daily and weekly vegetable shortage**

- There is a daily vegetable shortage on 1/8/18. High school students must be offered minimum 1 cup vegetables. They are only being offered ½ cup baked beans and 3/8 cup of daily salad bar.
 - The daily salad bar provides ¼ c vegetables from leafy greens and 1/8 c vegetables from dark greens.
 - Per assorted salad bar recipe, 60 portions of ¼ cup dark green, ¼ cup red/orange, and ¼ cup other vegetables are planned to be taken.
 - 4# spinach provides 60x ¼ cup servings, crediting as 1/8 c. 3# broccoli provides 60x 1/4 cup servings. Only 1/8 cup dark green (the smaller of the amounts) can be credited toward the salad bar during the week of review.
 - There is insufficient information for sliced bell peppers. Therefore, no red/orange vegetables can credit toward the salad bar during the week of review.
 - There is insufficient information for cucumbers. Therefore, no other vegetables can credit toward the salad bar during the week of review.
 - At most, ¼ cup of greens (1/8 cup romaine and 1/8 cup lettuce or ¼ cup spinach) and 1/8 cup dark green vegetables can credit. The salad bar, at current, can only credit as 3/8 cup vegetables.
- There is a daily vegetable shortage on 1/10/18. They are only being offered ½ cup broccoli and 3/8 cup of daily salad bar with the Chicken Patty or Uncrustable entrée options.
- There is a daily vegetable shortage on 1/11/18. They are only being offered 3/8 cup of daily salad bar.

These daily shortages result in a weekly vegetable shortage. High school student must be offered minimum 5 cups vegetables per week. They are only being offered 4-7/8 cups.

Corrective Action Needed for Finding #2: Please submit a written statement explaining how students will be offered the required daily (1 cup) and weekly (5 cup) minimum amount of vegetables (to be verified upon submission of CA #7).

****** **Finding #3: Daily fruit shortage**

There is a daily fruit shortage on 1/8/18 and 1/9/18. High school students must be offered minimum 1 cup fruit. They are only being offered ½ cup of grapes each day.

Corrective Action Needed for Finding #3: Please submit a written statement explaining how students will be offered the daily (1 cup) required minimum of fruit (to be verified upon submission of CA #7).

**** ☐ Finding #4: Milk Variety**

A variety of milk, at least two allowable milk types, is required to be offered daily at lunch and breakfast. Allowable milk types in Child Nutrition Programs include nonfat (skim) unflavored milk, nonfat (skim) flavored milk (e.g., chocolate), and low-fat (1%) unflavored milk. Partway through lunch service on 2/20/2018 only one milk type was available to students (fat free chocolate). There was no replacement, so only one milk type was available for the remainder of lunch service.

Corrective Action Needed for Finding #4: Please submit a written statement explaining how students will be offered the required minimum of 2 milk types daily.

☐ Finding #5: Offer versus Serve

Administrative staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. Staff supervising the salad bar were requiring students to select 1/2c fruit and/or vegetable, regardless as to if they already had selected 1/2c fruit and/or vegetable with the entrée. This is a violation of OVS because students grades 9-12 reserve the right to decline fruit and/or vegetable beyond the 1/2c requirement under OVS. Although all students observed at lunch took a reimbursable meal, it is important for all staff, including administration that assist with meal service, to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs) is available on our NSLP requirement website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>) under the offer versus serve heading.

Corrective Action Needed for Finding #5: Conduct or view OVS training for all staff assisting with meal service, such as the [OVS webinar](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html). Provide documentation of all staff attendance at this OVS training.

☐ Finding #6: Recipes for assorted Items

It is highly recommended to utilize and correctly complete production records for assorted items. Various production record templates are available on the [Meal Planning and Production](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

If it becomes too time- or labor-intensive to record items by type on production records, consider using recipes. Individual [recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) document average item usage by meal (breakfast or lunch) and grade group (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). When an item recipe is on file, total usage must still be recorded on production records. Recipes must be updated twice per year or when you notice that students' preferences have changed.

Corrective Action Needed for Finding #6: Please submit a written statement explaining how each item served will be recorded (to be verified upon submission of CA #7). Alternatively, submit a standardized recipe for:

- Assorted bagel
- Assorted muffin
- Assorted cereal
- Assorted cereal bar
- Assorted yogurt
- Assorted fruit

- Assorted juice
- Daily milk (breakfast and lunch)
- Assorted vegetables (lunch)

❑ Finding #7: Incomplete/inaccurate Production Records

Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

- The number of purchase units prepared must be recorded (eg, 2 cases, 3 #10 cans, 4 bags)
- Eliminate items that are not served (eg, vegetarian bento box) and ensure that all items being prepared are recorded
- List each item on a separate line if they are being offered separately in place of a standardized recipe (eg, “BBQ pork” and “bun”, not “BBQ pulled pork sandwich”)
- Indicate which lettuce was served daily at the salad bar
- Record the menu item with recipe name/reference number or product name/description
- Record actual milk usage by type (or milk recipe)

Corrective Action Needed for Finding #7: Please submit one 5-day week of correctly completed breakfast and lunch production records with all required components

❑ Finding #8: Breakfast menu

There was no breakfast menu available for the week or day of review.

Items such as milk may either be listed daily or may be listed in one place on the menu and include a statement that says a variety of milk is offered daily as part of the reimbursable meal.

The printed menu should list all components included with the reimbursable meal along with the USDA non-discrimination statement.

Corrective Action Needed for Finding #8: Please submit a complete breakfast menu with all required statements

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 category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- The ending balance, on June 30, can never be a negative balance. It was noted a transfer was correctly made from the non-federal funds to bring the ending balance to \$0.00.
- As free and reduced students are participants in the WSDMP, the cost differential between the cost of milk and the state reimbursement may be absorbed by the non-profit food service account (Fund 50 in public schools). Please note, the cost of milk served to students of paid status (those that cannot be

claimed in the WSDMP) may not be absorbed by the non-profit food service account (Fund 50 in public schools). The revenue and expense of paid student milks is treated as a nonprogram foods expense and revenue.

- 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” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, report 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, 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) (<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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) may be found our Financial Management webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs 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) (<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
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department

of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category.

Corrective Action Needed: Due to the number of program changes that have occurred since last year that will significantly impact the report, I am not requesting that last years report be updated, but rather, please provide a statement that the 2017-18 SY annual financial report have revenues and expenditures will be broken out by program.

Paid Lunch Equity (PLE)

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Refer to the [PLE 'In a Nutshell'](#) for more information on the PLE tool.
- Step by step instructions to completing the PLE tool can be found on our [financial website](#) under Paid Lunch Equity.

Revenue from Nonprogram Foods

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

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, 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.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- 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>).

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

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.

- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc). This tool was used in setting the adult meal prices for your district.
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

Resources

- [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)

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- ❑ **Finding #1:** The Nonprogram Foods Revenue Tool has not been completed for the current school year.

Corrective Action Needed: Watch the [Nonprogram Foods Revenue Tool webinar](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html) and submit a completed nonprogram foods revenue tool using a 5-day reference period that represents a typical week from the current school year (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).

Indirect Costs

Commendations/Comments/Technical Assistance (TA)/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 an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. 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 reality 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 the district's total.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

Nondiscrimination Statement

- The correct [non-discrimination statement](#) is used on letters, menus, website, and other documents used to convey program information.

And Justice for All Poster

- “And Justice for All” posters were 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 food service and other district staff that work with students during the school meal programs and documentation was available for review.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form was completed.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable.

SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Overt Identification

- No concerns regarding overt identification was noted.

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 Complaint 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 (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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

Onsite Monitoring was completed for all schools for both NSLP and SBP and were available for review.

Local Wellness Policy (LWP)

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

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the 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 the SFA complies with the policy.

Content of the Wellness Policy

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>). At a minimum the wellness policy must include:

- 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).

Resources:

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

SFA is required to make the LWP available to the public and the public must be informed of updates to policy

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform the public about the content, implementation of, and

updates to the LWP annually. Once the updated policy is approved, notify the public regarding updates to the LWP. SFAs may use a variety of methods to notify the public about the LWP and its updates. This may include mailing flyers, newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification.

SFA is required to review and update LWP

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually.

SFA is required to have a committee of diverse stakeholders and/or a roster of those involved

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. SFA wellness committees should include a diverse team of committed school and community stakeholders. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.

SFA is required to inform potential stakeholders of their ability to participate in the LWP

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of 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>).

SFA is required to complete an assessment of the LWP

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* 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) (<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) (<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/) (<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.

Technical Assistance The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Findings and Corrective Action Needed: Local Wellness Policy

❑ Finding #1: LWP is not made available to public

Corrective Action Required: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to make the local school wellness policy available to the public and inform the public about the content, implementation of, and updates to the LWP on an annual basis. Provide a plan for making the wellness policy available to the public and explain how you will notify the public of the updated policy.

Smart Snacks in Schools

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

Thank you to the high school principal for timely communication and cooperation. We appreciate your organized documentation and attention to compliance.

Thank you to the FSD for providing nutrition information for all a la carte items. We appreciate your timely communication and thorough documentation.

There are two situations by which an organization may sell foods and beverages to students during the school day.

1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards.
 - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.

- b. Exempt fundraisers cannot occur in the meal service area during meal times.

Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. 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>).

Findings and Corrective Action Needed: Smart Snacks

❑ Finding #1: Non-compliant Items

Cambridge High School sells 20 fl oz 140 calorie Gatorade in the vending machine during the school day. This item does not meet the Smart Snacks standards for high school students.

We recommend using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/), (<https://foodplanner.healthiergeneration.org/calculator/>) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records. 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>).

Corrective Action Needed for Finding #1: Submit compliant versions of the products listed above including nutrition facts labels. Alternatively, submit a written plan for how you will eliminate the non-compliant items above.

Professional Standards

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

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Your current school food service director was hired after July 1, 2015 and meets the minimum hiring requirements for your district.

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, substitute, 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.
- Other staff that assist with the school meal program, provide job specific training as appropriate, no specific number of hours required annually.

Findings and Corrective Action: Professional Standards

- ❑ **Finding#1:** Training was being monitored, but only total hours, not all required information was included in the tracking tool being used.

Corrective Action Needed:

Begin using the DPI professional standards tracking tool to ensure all required information is being tracked. This has already been completed, no further action required.

- ❑ **Finding#2:** All food service staff and non-food service staff who have responsibilities in the school meal program are required to have annual training hours and should be included in the tracker tool.

Corrective Action:

- Update the Professional standards tracking tool to include non-school food service staff that have duties for the school meal program and;
- Provide a statement of how non-school food service staff will receive annual training for the 2017-18 SY.

Water

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.

Water is made available by a water fountain in the cafeteria.

Food Safety and Storage

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

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

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and 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

- The Food Safety Plan was available for review. 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 a listing of food service staff at that site. **The food safety plan must be reviewed annually and updated as needed.**
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](#) 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, no concerns noted.

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

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 the 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.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Uncategorized menu items into Process 1, 2, and 3.

Corrective Action Needed: Categorize all menu items on chart for Menu Items Categorized by Process 1, 2, or 3. Looking at the menu, not all menu items are included. Submit updated chart as an attachment.

- ❑ **Finding #2:** Most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action Needed: Post most recent food safety inspection report in location visible to public.

- Completed on-site. No further action required.

Buy American

Comments/Technical Assistance/Compliance Reminders

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

The Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

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 noncompliance products, can be found on the [SNT Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

❑ Finding #1: Non-compliant items

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

- Bell peppers-Mexico
- Garlic powder- US and China
- Grapes- Chile

Corrective Action Needed for Finding #1: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A template form is located on the [procurement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Reporting and Recordkeeping

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

You are commended for adding the school breakfast program to the middle and high school this year! Currently breakfast participation at the high school is very low. The following are some suggestions for assisting with increasing participation.

Reminder: 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.

Breakfast Promotion

Look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Cambridge School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- 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>).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

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

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5th grade.
- Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one.
- DPI SNT approved milk substitutes, such as an approved soy milk beverage, are **not** allowed to be claimed in the WSDMP due to the differences in the Wisconsin State Statute from federal child nutrition program regulations. Lactose free cows milk would be allowable.
- Juice can only be served and claimed under the WSDMP when it is used as a milk substitute for a student with a documented milk allergy or intolerance. A statement from a medical provider for a substitute is not required since this language is not included in the statute, so the request may be accepted from anyone. The reason does need to be for an allergy, metabolic disorder or other condition that prohibits him/her from drinking milk. A parent note that my child does not like milk as a preference, would not be acceptable.
- A juice substitute is 8oz to be consistent with the serving of milk.
- A [WSDMP FAQ](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf) is found on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf>).

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



With School Nutrition Programs!