

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Sun Prairie School District

Agency Code: 13-5656

School(s) Reviewed: Westside Elementary, Cardinal Heights Upper Middle School (CHUMS), Prairie Phoenix Academy (PPA)

Review Date(s): 1/22/18-1/25/18

Date of Exit Conference: 1/25/18

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:

GOALS

- 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).

SOCIAL MEDIA

- Submit photos to the School Nutrition Team to be posted on the DPI SNT Facebook page, Twitter page or Instagram page. Send photos to Dana Colla at dana.colla@dpi.wi.gov.

Appreciation/Commendations:

Thank you to the Food Service Director, Food Service Manager, Determining Official, Administrative Assistant, Food Service employees and District staff for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. Everyone was very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. Thank you for all that you do to feed the students healthy meals! You are much appreciated!

The Food Service staff at all meal observation sites were knowledgeable, welcoming, and clearly dedicated to their work, serving nutritious meals to students.

While working with the Food Service Director, it was evident that the director is passionate about providing high quality meals, training staff members, adhering to regulations, and continuously working to improve the meal programs.

While working with the Food Service Manager, it was apparent that the manager was knowledgeable about the daily operations at the schools and was able to easily answer all questions asked.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- The Determining Official did an excellent job documenting communications made with households to clarify details on applications. The official's organization of the requested benefits information made it easy to review. Also, the official was receptive to suggestions and eager to learn.

Technical Assistance/Compliance Reminders

- 525 eligibility determinations were reviewed; 12 errors were identified.

Free and Reduced Price Meal Applications

- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).

Direct Certification

- When running Direct Certification, if you are running the entire district enrollment, note it is a Full Run. If you are not running the entire district enrollment, note that it is a Partial Run. At a minimum, you should run the entire district enrollment through Direct Certification three times a year- once at or before the beginning of the school year, again three months later, and again six months after the first run.
- Direct Certification is also required to be run in March for an annual report to USDA.

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.

Disclosure

- For any staff that has access to students' eligibility status that isn't within the School Nutrition Office (i.e. IT Department) they must sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This is to protect the students from any overt identification. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website.

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. The SFA did not have adequate documentation on file confirming the status of homeless students. See corrective action below.
- 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.

Limited English Proficiency (LEP)

- The SFA makes reasonable efforts to provide household letters and application forms to families in the appropriate languages, including offering program materials in English, Spanish, and Hmong.
- 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.

Findings and Corrective Action Needed:

Finding #1: One student was receiving free benefits, but should have been paid because the student was living in a different household that did not have documentation on file to support this benefit.

Corrective Action Needed: Notify the household, whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

Finding #2: One student was receiving free benefits, but should have been reduced-eligible. The application on file was determined correctly, but the correct benefit was not transferred over into the student software correctly.

Corrective Action Needed: Notify the household, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

Finding #3: Ten students were found receiving free meal benefits stating the student was directly certified. However, the students were not found on any Direct Certification runs from the 17-18 SY or extended benefits from another household member. There were no applications on file to support the eligibility status either. This may have been due to the SFA switching over to a new software system in October.

Corrective Action Needed: Notify each household, whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

Finding #4: The Direct Certification Approval for Benefits letter sent to households contains the incorrect non-discrimination statement.

Corrective Action Needed: Please provide a copy of the letter that will be used going forward that contains the full, correct non-discrimination statement. **Corrected on-site; no further action required.**

Finding #5: The SFA did not have adequate documentation to confirm the status of one categorically eligible homeless students.

Corrective Action Needed: Contact the homeless liaisons/social workers at each school to obtain a written list of confirmed homeless students at each school. Please submit these written lists of homeless students' names to the Nutrition Program Consultant, along with a statement that the SFA will obtain written lists of categorically eligible homeless, migrant, and runaway students directly from the school social workers when determining benefit eligibility going forward.

Verification

Technical Assistance/Compliance Reminders

- The SFA did not have the signature of the Verifying Official in the designated area on the back of the verified applications. 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. Additionally, the Verifying Official should sign the designated area on the back of the application when the verification process is completed for each verified application.
- The sampling pool used in the verification selection process must be based on the number of applications on file as of October 1st. Please reference the current Eligibility Manual for more information regarding the verification process.

Findings and Corrective Action Needed:

Finding #1: The "We Must Check Your Application" Letter sent to households pertaining to verification selection did not contain the correct non-discrimination statement.

Corrective Action Needed: Please provide a copy of the letter with the correct non-discrimination statement that will be distributed to households the following school year. **Corrected on-site; no further action required.**

Finding #2: The verification collection report (VCR) contained several errors. The Results of Verification section contained an error in which several results was reported in the wrong category. Additionally, Section 4 of the VCR was found to contain inaccurate application counts. The numbers reported indicated that nine applications should have been verified, however the reported numbers were as of 10/12/17 instead of the required date of 10/1/17. Because the date of 10/12/17 was used, applications approved after 10/1/17 were incorrectly included. Section 4 and the proceeding calculation used to determine the required number of applications to verify must be based on the number of applications on file as of 10/1/17.

Corrective Action Needed: Please correct the results section of the VCR so that it accurately reflects the results of verification in each category. Additionally, please correct Section 4 so that it accurately reflects the number of applications in each category listed and the number of students in each category listed as of 10/1/17. Accurate numbers for Section 4 may be obtained by running the appropriate report in the software system to show the breakdown of applications on file as of 10/1/17 or by completing a manual count of applications in each category on file as of 10/1/17. **Please notify the Nutrition Program Consultant when these corrections are completed.**

Meal Counting and Claiming

Commendations

The correct reports are used to complete the monthly claims for reimbursement. The Breakfast and Lunch claims for December were done correctly with no errors.

Technical Assistance (TA)/Compliance Reminders

- Please note that SFAs may claim visiting students (school age) in the paid category or the individual's category with documentation, unless they are from a CEP school.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at Sun Prairie School District for providing documentation prior to the review. Documentation was thorough and well organized. All of my questions were answered very quickly which helped to expedite the process of reviewing meal pattern compliance.

The food service staff at each school reviewed is doing a wonderful job. They were very friendly during observations, willing to answer questions and open to technical assistance provided. They were well trained in offer versus serve and made sure that students did not select duplicates of the juice offered at breakfast. Many positive interactions with students were witnessed. Kitchen and service areas were very clean and organized.

Comments/Technical Assistance/Compliance Reminders

Documentation

Production records do not fully meet all of the production record requirements (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). The following information was missing from the template or incompletely filled in:

- Total planned quantity not completed correctly for all items, or missing units
- Planned number of servings ok for some, but for vegetables, pounds are being listed (which would be total planned quantity) *note: since a recipe is available for the garden salad, each individual vegetable doesn't need to be recorded on the production record.*
- Be more specific with items such as pizza and chicken patty. Since a variety of these items are used in the district, including item numbers can aid in ensuring that the correct product is used.

In order to accurately document the items that were offered as part of the reimbursable meal, items should be recorded by type on the production record (for example, if a variety of cereal is offered, each type should be recorded with planned number of servings, actual number prepared, leftover, etc.). This is especially important when different varieties credit differently or have different dietary specifications. If the same varieties are offered consistently, a recipe may be developed and then the total usage may be recorded instead of by type. However, a recipe would need to be developed for each site based on actual usage for a week and updated at least twice per year. Additionally, actual products served (e.g. fresh fruit type/s, breakfast to-go pack) must be documented on the production record.

Each menu item should be recorded on its own line (for example, ravioli with WG roll) unless multiple items are bundled and there is a recipe.

While reviewing the production records from the week of review at CHUMS, there was a significant difference in the number of meals planned and actually served (ex. 12/18 there were 518 meals planned for 9th grade and 281 meals served). This resulted in a significant amount of leftovers. In order to help reduce food cost and food waste, staff is encouraged to work on more accurate forecasting using historical data.

Meal Pattern Crediting

According to the Food Buying guide, 3 - 1/2in x 4in celery sticks credits as ¼ cup of vegetable. However, the food service staff had done an in-house yield and determined that 3lbs of celery sticks provided 3 quarts of vegetables, which came out to a 2 oz serving = ½ cup vegetable = 3 sticks. During the on-site review, the proper process for conducting an in-house yield was discussed and the process was re-done. There was some variation in the number of sticks needed to credit as ½ cup, ranging from 3-5 sticks. Therefore, an average was taken and it was determined that 4 sticks provide ½ cup of vegetables.

Going forward, any yields found to differ from the Food Buying Guide should be documented with an [in-house yield study](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). This process requires 6 samples to be measured by at least two different individuals.

Portion Size

Mandarin oranges at Westside EI were pre portioned into 4fl oz ramekins. While a 4 fl oz spoodle was used to portion the fruit, ensuring that ½ cup of fruit was provided, this meant that the dishes were completely full and/or overflowing. Using a larger cup, such as 5fl oz or 5.5fl oz is encouraged to provide the full ½ cup serving while decreasing the potential for spillage.

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g. mashed potatoes, gravy). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the 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. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Grade Groups

Cardinal Heights Upper Middle School (CHUMS) serves 8th and 9th grade students. The food service director has conducted a nutrient analysis to determine that offering 8th grade students ½ cup of fruit and 9th grade students 1 cup of fruit, but keeping all other menu items and portion sizes the same is sufficient to meet the dietary specifications for each grade group.

Currently, each grade is being recorded on a separate production record. While this is acceptable, utilizing a [two grade group production record](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) may aid in consolidating information and streamlining the documentation process (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Signage

Signage was posted at Westside Elementary and CHUMS to communicate to students what can and must be selected as part of a reimbursable breakfast and lunch. When using the customizable signage, be sure to update prior to each meal with the planned menu for the day.

Findings and Corrective Action Needed

❑ Finding #1: The grain-based dessert limit of 2 oz eq at lunch was exceeded each week during the month of December.

Both the yogurt meal and PB&J meal are served with a sweet cracker (Bug Bites or Scooby Snacks), which according to [Exhibit A](#) is considered a dessert at lunch (see superscript 4, “Allowed for desserts at lunch as specified in §210.10, and for breakfasts served under the SBP”) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf).

For additional information on grain-based desserts, watch “The Grain Component” webcast on our [training page](#) (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Corrective Action Needed: Submit updated recipes for the PB&J and yogurt meals along with a monthly menu to show that the menu is in compliance with the grain based dessert limit.

❑ Finding #2: During 8th grade lunch observation at CHUMS, two students were observed leaving the line with less than ½ cup of fruit/vegetable. Therefore, these two meals were non-reimbursable.

The 8th grade students in the 3rd lunch period were offered an orange as their only fruit option and garden salad (self-serve) as their only vegetable option. This meant that students who did not take an orange needed to have at least ½ cup of creditable salad. As the POS staff were not watching the students dish up the salad, it was difficult to determine if they had taken a full scoop and therefore had that full ½ cup serving.

A few options were recommended including: pre-boating the salad, offering additional fruit options (while continuing to limit students to 1 fruit choice to meet the dietary specifications), and/or offering additional vegetable options.

Corrective Action Needed: This was discussed during meal service and students were provided an applesauce cup at the POS if there was any question whether or not they had a full ½ cup of fruit/vegetable on their tray. Going forward, CHUMS plans to pre-boat salad into ¾ cup and 1 ½ cup servings (crediting as ½ cup and 1 ⅙ cup respectively) to ensure students are selecting a sufficient amount- **no further action needed**

❑ Finding #3: At PPA, a whiteboard was used to show students the planned menu for the day. However, it did not include information about what they needed to select for their reimbursable meal (3 components including at least ½ cup fruit and/or vegetable). No additional signage was posted.

Corrective Action Needed: Submit a photo or PDF of the signage that has been posted.

❑ **Finding #4:** A product formulation statement was provided for the mini pizza bagels. However, the supplemental APP documentation was missing.

Corrective Action Needed: Please provide the additional APP documentation needed to credit the product.

❑ **Finding #5:** Popcorn chicken bowls were served during meal observation at PPA on 1/25/18. The CN label for the popcorn chicken states that 12 pieces credits as 2 oz eq meat/meat alternate (m/ma) and 1 oz eq grain. However, the bowls were planned and prepared with 11 pieces of chicken and consequently did not provide a full 2 oz eq m/ma. This resulted in a daily m/ma shortage for the 9-12 grade students.

A m/ma shortage was noted as a finding on the previous administrative review, therefore, this is a repeat violation and is subject to fiscal action. Per USDA, fiscal action must be taken “for all sites, reviewed and non-reviewed, in which the non-reimbursable meals were served.” This means that the popcorn chicken meals served to 9-12 graders at PPA, CHUMS and Sun Prairie High School on 1/25/18 will be reclaimed.

Corrective Action Needed: Submit the meal counts for popcorn chicken meals served to 9-12 students on 1/25/18.

3. RESOURCE MANAGEMENT

Commendations

PLE Tool

- SFA is running the PLE tool correctly and adhering to the required lunch price increases every year.

Technical Assistance/Compliance Reminders

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](#). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](#).
- The SFA currently has a written unpaid meal charge policy in place which is adequately distributed to households and enforced in the SFA. The SFA has plans to continue improving and revising the policy.
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account 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](#) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

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, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found on the Financial Management webpage. A best practice is to continue to collect on the unpaid meal charges as long as you are able to and the student is still enrolled. If unable to collect, then a

transfer is required to Fund 50 from Fund 10 or another non-federal fund.

- Per question 15 of the [Financial Q&A](#), student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50. Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50.

Revenue from Nonprogram Foods

Commendations

- The SFA is pricing their a la carte food items correctly. Using the Child Nutrition Program Report from the 16-17 SY and the below USDA Nonprogram Food Revenue Tool, the SFA is adequately pricing out its nonprogram food prices. It was found the SFA is in compliance with the Nonprogram Food Revenue regulation.

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at Sun Prairie Area School District include: Adult Meals, A la Carte, Extra Entrees, Extra Milk, and Caterings.
- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#), located on the SNT website, feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation.

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

- The [Menu Raw Food Costing Tool](#) is an excellent tool to cost out your reimbursable meals and extra entrees. It is also helpful in completing the [DPI Nonprogram Food Price Calculator Tool](#) which will also calculate the USDA Non Program Food Revenue calculation for you automatically.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed for all staff involved with the School Nutrition Programs. The PI 1441 form was completed correctly.

Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 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.

Sharing of Information and Disclosure of Free/Reduced Status

- The SFA allows households to receive various fee waivers if they qualify for free/reduced meal benefit. The SFA uses a form for households to consent to have their meal benefit status shared for this purpose. As is required, the form utilized has each fee waiver broken out separately to allow families to choose how their information will be shared. However, the form is lacking the appropriate non-discrimination statement. Please see finding below.

Civil Rights Self-Compliance Form

- The SFA completed the [Civil Rights Self-Evaluation Compliance](#) (PI-1441) form after the designated deadline. This report must be completed by October 31st annually.

Civil Rights Training

- The SFA is responsible for training all staff, with job duties pertaining to the School Nutrition Programs, on Civil Rights at the beginning of the school year. While the SFA held training for all staff in November, it must be done at the beginning of the school year.

Special Dietary Needs

- The SFA has an appropriate procedure in place for handling special dietary needs requests.
- At Cardinal Heights Upper Middle School, there is a lunch table designated as “peanut free.” It is highly recommended to change the designation of this table to something more general such as “peanut aware” or “allergen aware.” Due to concerns over possible cross-contact of allergens onto this designated table, labeling it “peanut free” may foster a false sense of security when it may not truly be guaranteed as “peanut free.” Using a more general term as described above may better represent the intent of this table.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal prices for student meals are visible on the computer screen that can be seen by staff, substitute cashiers, students, and anyone walking by which constitutes overt identification.

Findings and Corrective Action Needed:

Finding #1: Student meal prices were viewable on the point of sale screen, \$0.00 for a free or reduced meal and the total amount for a paid meal (depending on the site and meal). This is a form of overt identification and is unallowable.

Corrective Action Needed: Configure the software to not show the current transaction on the screen at each school in the district.

Submit a statement in writing to explain how you will prevent overt identification at the point of sale.

Finding #2: The sharing information/fee waiver form that is distributed to households does not contain the correct non-discrimination statement.

Corrective Action Required: Please provide a copy of the form that will be used going forward that contains the correct non-discrimination statement. **Corrected on-site; no further action required.**

On-site Monitoring

Technical Assistance /Compliance Reminders

- Copies of the on-site monitoring forms were on file for a couple of the review sites. The rest must be reviewed by February 1. A minimum of 50 percent of the schools operating the SBP under the SFA's jurisdiction must be monitored at least once every two years.

Local Wellness Policy

Commendations

The SFA has a Wellness Policy in place. It was last updated in 2017 and it is available on the school website. The Wellness Policy Implementation procedure provides excellent details on how the SFA will meet the goals of the policy. School board meeting minutes that include wellness policy updates are available on the website.

Technical Assistance/Compliance Reminders

Triennial Assessment

- The final USDA rule requires triennial assessments of the LWP: how the LWP compares to model policies, district compliance with its own policy and progress made in attaining district goals. The first of these assessments is to be completed by June 30, 2020. The following is technical assistance regarding that.

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](https://dpi.wi.gov/school-nutrition/wellness-policy) webpage (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy](http://www.fns.usda.gov/tn/implementation-tools-and-resources) 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](https://www.wihealthatlas.org/lwp/) 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.

SFA required to inform the public of the results of the most recent assessment

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.

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](#) for local school wellness policies.
- USDA Food and Nutrition Service has information on the [local school wellness policy](#) process and wellness policy elements.
- Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card.

Findings and Corrective Action Needed: Local Wellness Policy

□ **Finding:** The SFA's LWP meets some but not all requirements as stipulated above. The required content that is lacking is language related to policy leadership and food and beverage marketing. Additionally, the policy should specifically include language referencing the Healthy Hunger-free Kids Act of 2010, USDA Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule, and Smarter Lunchrooms.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule.

Smart Snacks

Commendations

It is clear that action has been taken to review inventory for compliance with the Buy American Provision. Great job having the proper documentation on file for non-domestic products.

Technical Assistance

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption.

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Findings and Corrective Action Needed

❑ Finding #1: Responsibility for tracking of fundraisers has not be clearly assigned.

Corrective Action Needed: Submit a statement indicating who will be responsible for tracking both compliant and non-compliant food fundraisers (ex. building principals, food service director, etc.).

Professional Standards

Commendations

The Food Service Manager is doing a wonderful job making sure staff are getting their required training hours throughout the school year, that pertain to their job duties. Most food service staff already have their required training hours fulfilled and it's January. Nice work! The Food Service Manager created a very organized tracking tool for professional standards that is excellent! The Food Service Director's hours are tracked on a separate spreadsheet. The Food Service Director is going above and beyond the required training hours to increase her knowledge within nutrition at the benefit of the district and the students. Wonderful job!

Buy American

Technical Assistance/Compliance Reminders

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

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 Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that 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 the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be 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 manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- 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>) and Buy American monitoring procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america>).
- 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>).

In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the notes above for sample certification language. This will be treated as technical assistance for the 2017-18 school year, but work with your distributor/supplier to move toward compliance. The following products were found without a clear country of origin indicated on the product or product packaging:

- Italian dressing & Ketchup
- Many of the spices
- Diced Chiles
- Spaghetti sauce
- Sorbet & Sidekicks
- Fruit & vegetable blend juice
- Beef franks

** Information from the distributor's website was provided indicating that the country of origin for these products was the United States.

Food Safety and Storage

Commendations

It was evident during meal observation that staff members are well-trained on food safety procedures and effectively implement the food safety plan.

- Site-specific food safety plans were available at each school. It was clear that the plans are reviewed and updated regularly.
- Temperature records and sanitizer concentration records were well-kept, detailed, and available at all meal observation sites.

Technical Assistance (TA)/Compliance Reminders

Food Safety Inspections

- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Food Safety Plans

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.

Food Employee Reporting Agreements

- 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.

Temperature Logs

- At PPA, prepared food is received from another school in the SFA. It was discussed that time as a public health control is used for these food items, food temperatures are not regularly taken and recorded on-site at PPA, and no transportation log is used for the food received. It is a best practice for the school preparing the food to record temperatures of the food when loaded for transport and to send the transportation log with the food for reference by the receiving school. Additionally, it is a best practice for the receiving school to take and record temperatures of the food items when they are received. However, these practices may or may not be necessary due to time as a public health control being utilized. Please consult with the local sanitarian for specific guidance related to temperature control requirements for these transported food items.

Findings and Corrective Action Needed: Food Safety

☐ **Finding #1:** Standard operating procedures (SOPs) regarding the Afterschool Snack Program, Field Trips, Time as a Public Health Control for TCS Food, and Glove Usage are not included in the food safety plan at Westside Elementary. SOPs are required for all applicable programs and processes occurring at the site.

Corrective Action Needed: Create or adapt SOPs (from the SNT website) to reflect *site-specific* procedures—particularly referring to the Afterschool Snack Program, Field Trips, Time as a Public Health Control for TCS Food, and Glove Usage at Westside Elementary School. At Westside Elementary, TCS food is removed from temperature control (mechanical refrigeration) and put onto ice packs. This requires a site specific SOP for the use of **Time as a Public Health Control**. Time as a public health control is used when hot or cold food is removed from temperature control for display or sale. The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold 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. Work with your local sanitarian to create/edit these 4 SOPs. **Submit a copy of the 4 updated SOPs for Westside Elementary regarding the ASP, Field Trips, Time as a Public Health Control, and Glove usage to the assigned DPI Nutrition Program Consultant via email. Corrected on-site; no further action required.**

☐ **Finding #2:** The most recent food safety inspection report is not posted in a publicly visible location at Westside Elementary.

Corrective Action Needed: Post the most recent food safety inspection report in a location visible to public, either in the cafeteria or in the school office. **Submit a statement in writing this has been completed.**

☐ **Finding #3:** Standard operating procedures (SOPs) regarding Field Trips, Time as a Public Health Control for TCS Food, and Glove Usage are not included in the food safety plan at CHUMS. SOPs are required for all applicable programs and processes occurring at the site.

Corrective Action Needed: Create or adapt SOPs (from the SNT website) to reflect *site-specific* procedures—particularly referring to the Afterschool Snack Program, Field Trips, Time as a Public Health Control for TCS Food, and Glove Usage at CHUMS. At CHUMS, TCS food is removed from

temperature control (mechanical refrigeration) and put onto ice packs. This requires a site specific SOP for the use of **Time as a Public Health Control**. **Submit a copy of the 3 updated SOPs for CHUMS regarding the Field Trips, Time as a Public Health Control, and Glove usage to the assigned DPI Nutrition Program Consultant via email. Corrected on-site; no further action required.**

☐ **Finding #4:** The food safety plan at PPA did not contain SOPs pertaining to glove usage and receiving food. Because prepared foods are received from another school in the SFA, an SOP should be in place that details the process for safely receiving these food items.

Corrective Action Needed: Create or adapt SOPs (from the SNT website) to reflect *site-specific* procedures for glove usage and receiving food at a satellite location at PPA. **Submit a copy of the two updated SOPs for PPA regarding the glove usage and for receiving food at a satellite location to the assigned DPI Nutrition Program Consultant via email. Corrected on-site; no further action required.**

☐ **Finding #5:** The food safety plan at PPA did not contain an equipment list.

Corrective Action Needed: Create a list of equipment at PPA and add it to the Food Safety Manual. **Submit a copy of the list to the assigned DPI Nutrition Program Consultant via email.**

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All documents pertaining to the School Nutrition Programs 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. In other words, keep all documents for 3 years plus the current school year.

School Breakfast Program (SBP) and

Technical Assistance

- At the beginning of the school year, the SFA notifies families of the availability of breakfast through the public release and posting menus. While this meets the requirements, additional promotion is encouraged throughout the school year to promote breakfast participation.

Summer Food Service Program (SFSP) Outreach

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 operated at Westside Elementary in Sun Prairie Area School District.

USDA would like 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>)

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

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snacks

Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you to the food service staff and afterschool program leaders that work together to provide healthy afterschool snacks at Westside Elementary. It was clear during snack observation that the children enjoy and benefit from the snacks.

Findings and Corrective Action Needed

Finding #1: One snack check-off sheet for the review period of December 2017 contained only 15 check marks in the Point of Service section suggesting that only 15 snacks were served, but the production record section indicated 29 snacks were served. For this day, 29 snacks were claimed for reimbursement. This inconsistency on the check-off sheet requires follow-up clarification.

Corrective Action Required: This inconsistency was dealt with immediately by the Food Service Director. Conversations with the afterschool program coordinators revealed that on this particular day, there were not enough coordinators present at the time to adequately record attendance and check-off snacks. This resulted in 14 snacks being served without being checked off. The Food Service director made a written note of this particular situation on the specific check off sheet. Moving forward, the afterschool snack coordinators have plans to reallocate responsibilities to ensure attendance and snack counts are correctly recorded on a daily basis. **No further action required.**

Finding #2: During snack service, it was observed and discussed that unserved snacks are returned to food service and re-served. This is an acceptable process for foods that are not time/temperature control for safety foods (TCS). However, additional steps should be taken when returning TCS foods such as milk, yogurt, and cheese. TCS food is removed from temperature control (mechanical refrigeration), is not put on ice packs, and does not have the temperature monitored during or after service. This practice requires a site specific standard operating procedure (SOP) for the use of **Time as a Public Health Control** in the context of the Afterschool Snack Program. There is currently no SOP in the food safety plan at Westside Elementary for the ASP or Time as a Public Health Control.

Corrective Action Required: A specific standard operating procedure (SOP) should be developed for afterschool snack procedures, which includes how these TCS foods will be safely handled. The SFA may also elect to discontinue service of TCS foods during ASP to eliminate the need for temperature monitoring control procedures for these items. Please see findings and corrective action related to SOPs in the Food Safety section of this report. **Submit a statement in writing explaining how you will make sure TCS foods are handled properly.**

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

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

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



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