

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

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**School Food Authority: Verona Area School District**

**Agency Code: 13-5901**

**School(s) Reviewed: Stoner Prairie El, Sugar Creek El, and Verona Area High School**

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

**Date of Exit Conference: 1/25/18**

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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 Verona School District for the courtesies extended to us during the on-site review. 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.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

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

450 eligibility determinations were reviewed, 5 errors were identified. This is low error rate, and will not be subject to fiscal action. Great job!

#### Free and Reduced Price Meal Applications

##### 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. DPI has visual aids to assist in processing applications, which outline "required" information by application type (income, case number, other source categorical.) to make it complete. These resources are available on SNTs website, under [Training Resources for Approval of Free and Reduced Price Meal Applications](#).
- When an application only has one frequency of payment indicated for all of the reported incomes on the application, the income should *not* be converted to annual, but using the [Income Eligibility Guidelines](#) look at the amount of income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).

##### Annual Income

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

##### Household Size Box

The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

### 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.

### 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.
  - It is particularly important that new *Other Source Categorical Eligible* children be documented and certified for free meals as promptly as possible. Clear procedures should be established between the liaison (s) and foodservice to minimize delays. If these communications are delayed, it may lead to unpaid meal charges. The effective date of eligibility is the date in which food service was first notified of the status and cannot be made retroactive. Proper documentation to substantiate free meal eligibility consists of the child's name or a list of names, effective date(s), and the signature of the homeless liaison. This documentation is acceptable in lieu of a free and reduced price meal application.
- 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.

### Effective Date of Eligibility

- The effective eligibility date of an application is the date it has been reviewed, determined complete, and is unambiguous.
- The effective date for direct certification is the date of the state output match file.
- Meal eligibilities cannot be made retroactive unless the SFA is approved to use the *submission date* as the effective date. 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. 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.

### 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.

### Direct Certification

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

### Transferring Students

FNS strongly encourages LEAs to immediately 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. 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.

The transfer of eligibility *between LEAs* for students attending CEP schools will be required by July 1, 2019.

**Note: Wisconsin DPI requires source documentation of the student's previous eligibility.**

### Independent Review of Applications

LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year. Verona SD had a 1.11% certification error rate and will not be required to conduct an independent review of applications.

### 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 template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template Disclosure of Free and Reduced Price Information form is located on

the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

### **Findings and Corrective Action Needed: Certification and Benefit Issuance**

- ❑ **Finding #1:** Application approval software is annualizing all determinations and does not have a place to input income eligibility guidelines in weekly, bi-weekly, monthly, and twice per month frequencies.

**Corrective Action Needed:** Follow-up with your software provider making them aware of all required income eligibility guideline frequencies. Submit a written statement to the state agency explaining how the situation will be remedied.

- ❑ **Finding #2:** Five student meal eligibilities within the statistical sample were determined incorrectly as listed on the SFA-1 form. Three student meal eligibilities listed on the SFA-2 form will also need be corrected, but are outside of the statistical sample. **Due to the low error rate, fiscal action will not be assessed, but corrective action is required for all meal eligibility errors listed below:**
  - **#64-** miscategorized as free and should have been paid; also verified incorrectly
  - **#17 & 166-** missing household income amount. Miscategorized as reduced and should have been paid
  - **#39-** incomplete application missing last four of the social security and a confirmation of household size. **This application was corrected onsite. No further action needed.**
  - **#96-** miscategorized as free and should have been reduced
  - **A and B-** missing income amount and miscategorized as reduced, should have been paid
  - **C -** miscategorized as free, should have been reduced

**Corrective Action Needed:** For any application that was miscategorized, send a letter of adverse action. Provided 10 full calendar days to appeal prior to changing the status in the software system. Send the nutrition consultant a copy of the SFA-1 form with the date of correction column filled in, the adverse action letters, the updated applications, and screen shots of the benefit issuance system once the status changes have been made.

- ✓ **Finding #3:** Verona High School created a secondary “Fee Schedule and Exemption Form” for the 2017-18 SY to waive *local* fees by meal benefit status without consulting the food service department. Prior parental consent was obtained, but the form does not allow parents to accept the waiver *by program*-- rather a blanket statement is made to cover “any additional classroom fees, field trip fees, and additional book fees.” Furthermore, the forms were processed by individuals who did not have USDA 3<sup>rd</sup> party disclosure agreements on file with food service prior to accessing the data.

Sharing of information must be limited to those that “need to know” and individuals requesting access to student level data must be aware of the consequences of improper sharing/release of this information. This secondary form and sharing system are not in compliance with USDA’s disclosure and confidentiality requirements.

**Corrective Action Needed:** Discontinue the secondary sharing form, which uses USDA meal data, and circumvents food service disclosure and confidentiality protocol. The food service department is already utilizing an approved USDA “Sharing Information with Other Programs Form”, so when outside programs would like to utilize free and reduced price meal data, request must flow through food service. Food service must ensure prior parental consent has been obtained and a 3<sup>rd</sup> party agreement form is on file prior to granting access. Local programs that do not want to utilize USDA free and

reduced price meal data can establish their own data collection system using an alternate household income form.

**The food service department worked hard prior to the onsite audit to remedy the situation by working with the LEA to improving internal procedures, limit those that “need to know”, and require individuals receiving student level meal data to sign-off on 3<sup>rd</sup> party agreements. Corrected off-site and on-site. No further action required.**

## Verification

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

LEAs are encouraged but not required to conduct additional follow-up if a household fails to provide adequate documentation after the first required follow-up. If the household does not respond or fails to provide adequate documentation after the required follow-up (and, if applicable, additional follow-ups), verification is considered complete for the household when notice of adverse action is sent. See page 112 of the Eligibility Manual for School Meals for more information.

### Findings and Corrective Action Needed: Verification

- ✓ **Finding #1:** The initial “We Must Check” letter provided to a household chosen for verification was not provided in an understandable language. This delayed the response time and led to a verification completion date after the November 15<sup>th</sup> deadline. The household’s meal application was completed in Spanish, thus verification communications should have also been initiated in Spanish.
  - The school is responsible for ensuring the individual’s application and other household materials (letter, instructions, notices, and verification materials) are available in an understandable language. Simply offering the most common non-English language is not sufficient. LEAs may use the translated materials available through DPI-SNT or FNS.

**Corrective Action Needed:** The agency obtained Spanish translated templates from the DPI SNT website while reviewer was on-site. **No further action required.**

- ❑ **Finding #2:** The verification process is not tracked well. Staff are newer to the process and could benefit from additional training.

**Corrective Action Needed:** View the “[Verification](#)” and “[Submitting the Verification Collection Report](#)” webcasts. Submit a copy of the completed quiz to the consultant and/or sign-off and communicate the date of completion via email.

## Meal Counting and Claiming

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

- Stoner Prairie and Sugar Creek Elementary have a pleasant eating atmosphere. Staff work hard to teach students how to navigate the meal service line while encouraging reimbursable meals. Students enjoy their time to socialize with peers while eating. Reviewer also noted Sugar Creek has recess before lunch, which may stimulate students’ appetite and is encouraged at all schools. Many of these elements can be used to assess future district wellness policy goals and objectives.

- Meals may only be charged to a student as the student receives a reimbursable meal to assure proper benefits issuance and accurate counts. Counts based on forecasts, back-outs, absentees, or indicating who *did not* take a meal are inaccurate and unacceptable point of sale systems.

### **Findings and Corrective Action Needed: Meal Counting and Claiming**

- ❑ **Finding #1:** Inaccurate point of sale during breakfast in the classroom at Stoner Prairie Elementary. Meals are obtained in the cafeteria and then taken back to the classroom to be counted. The *student* marks their name off a list if they *did not* take a meal.

**Corrective Action Needed:** Submit a statement explaining how the point of sale will be corrected. Reviewer discussed counting reimbursable meals in the cafeteria, or delivering the food to the classrooms where *teachers* conduct the point of sale *as the student receives their meal*. Once the system is corrected, submit 30 consecutive operating days of clean counts (edit checks for this site) to the consultant. **These counts will be used to correct claims back to the beginning of the school year and may result in fiscal action.**

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations**

Sincere thanks to the Food Service Director and Assistant Director of the Verona Area School District and to the school nutrition professionals of Sugar Creek Elementary, Stoner Prairie Elementary, and Verona Area High School (VAHS). We appreciate your time and efforts spent preparing for and participating in the onsite review. The Assistant Director's assistance, prompt action, and availability during the onsite review were greatly appreciated.

VAHS provides a wide selection to students at both breakfast and lunch. The school nutrition professionals demonstrated excellent customer service to students during a hectic meal service. They were receptive to changes suggested, including Sub Line and Line 1 and Line 2 personnel, can clearly take pride in their work. Line 1 and Line 2 featured colorful and attractive salad bars.

Thank you to the school nutrition professionals of Sugar Creek Elementary for serving nutritious and appealing meals to students with smiles! The Sugar Creek Elementary cafeteria is a welcoming and fun learning environment for students. Thank you for the kind hospitality. The time that staff took out of their busy days to answer questions was appreciated.

Stoner Prairie school nutrition professionals were friendly, receptive to feedback, and clearly passionate about providing fresh, filling, and appealing meals to students. They demonstrated good understanding of OVS and sent students back for more fruits or vegetables as appropriate. The Stoner Prairie Elementary cafeteria was a positive environment where students were encouraged to socialize with their peers and interact with the monitors.

### **Technical Assistance and Program Requirement Reminders**

#### **Non-reimbursable Meals**

Four students at Sugar Creek Elementary selected non-reimbursable meals during lunch meal observation on January 22. Students' meals were short of the required 1/2 cup portion of fruit, vegetable, or combination.

Twelve students at VAHS selected non-reimbursable meals during breakfast meal observation on January 23. Food service staff mistakenly identified a 57 gram muffin as 2.0 ounce equivalents (oz eq) of grain and two items at breakfast. As the muffin credits as 1 oz eq, it is only one item; therefore, a

muffin and six fluid ounces of juice was only two items, which does not constitute a reimbursable breakfast.

Six students at VAHS selected non-reimbursable meals during lunch meal observation on January 23. The planned portion size of eleven pieces of popcorn chicken, crediting as 1.75 oz eq meat/meat alternate (m/ma) and 0.75 oz eq grain, contributed to three non-reimbursable meals. Neither the m/ma nor the grain was present as a full component. Per the Assistant Food Service Director, the portion size of popcorn chicken will be increased from eleven to twelve pieces. Furthermore, clementines credit as 3/8 cup each. If a student selected one clementine as his or her only fruit or vegetable, then his or her meal was short of the required 1/2 cup portion of fruit, vegetable, or combination.

**These meals were non-reimbursable, and fiscal action will be assessed.**

### **School Breakfast Program - Crediting**

An item at breakfast is defined as 1.0 oz eq grain, 1.0 oz eq m/ma, 1/2 cup of fruit and/or vegetable, or 1 cup of milk. Under Offer Versus Serve (OVS), four food items must be offered at breakfast, and students must select at least three food items, including 1/2 cup fruit, vegetable, or combination, to have a reimbursable meal.

Graham crackers offered at breakfast on December 12 at Stoner Prairie Elementary credit as 0.75 oz eq of grain. These graham crackers must be bundled with another item(s) so at least 1.0 oz eq of grain is offered. Graham crackers alone may not count as an item.

Grains can be credited based on weight using [Exhibit A](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf) of the *USDA Food Buying Guide* ([http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa\\_fbg.pdf](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf)). If a product is not on Exhibit A, then you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the *grams of creditable grain* in the product. Divide this number by 16 grams per ounce equivalent to calculate the grain contribution for that product.

### **Food Buying Guide**

The [USDA Food Buying Guide for Child Nutrition Programs](https://foodbuyingguide.fns.usda.gov/) contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods), including fruits like clementines, grapes, baby carrots, and apple slices. Foods that do not have standards of identity are not listed in the Food Buying Guide and require further documentation (a CN label or a PFS) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs. Refer to the [Food Buying Guide](https://foodbuyingguide.fns.usda.gov/) for more details on how specific foods and ingredients credit toward the meal pattern (<https://foodbuyingguide.fns.usda.gov/>).

### **Crediting Grapes**

Portion sizes served must be full, level scoops in standardized measuring utensils. Grapes at the elementary school were portioned into “bunches” and left on the stem, then served with tongs. This is neither a standardized nor a consistent serving size. A full 1/2 cup of grapes must be included in the portion cups to fulfill the 1/2 cup fruit requirement for reimbursable meals under OVS if no other fruits or vegetables are selected.

The FBG entry for *Grapes, fresh, Seedless, Whole, With stem*, lists 1/4 cup whole fruit as equal to about 7 large grapes.

### **Weekly Juice Limit**

No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. When VAHS students are offered 3/4 cup juice and 1/2 cup fruit each day at breakfast, 60% of the fruit offered over the course of the week is offered in the form of juice, which is not allowable.



### **Grain-Based Desserts Weekly Limit**

Per the Pizza Line January 2018 menu, a cookie crediting as 1/2 oz eq whole grain-rich (WGR) dessert is offered daily. A total of 2.5 oz eq WGR desserts are offered weekly at the Pizza Line, which exceeds the weekly limit of 2.0 oz eq grain-based desserts. Even if cookies are offered as an extra, they contribute to the dietary specifications for calories, sodium, saturated fat, and trans fat. Staying within the dietary specifications is very difficult when extras are served daily. Cookies and other extra foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal.

### **Extras**

Extra items, both creditable and non-creditable, such as potato chips, ice cream, churros, alfredo sauce, soups, and various vegetables, are offered daily on the menu. Several of these foods could credit towards the daily and weekly meal pattern requirements but currently do not. For example, the meal planner could plan vegetables at the sub line to credit towards the meal pattern, when served a minimum of 1/8 cup, prior to the point of service (POS). While offering extra items occasionally is allowable and can be an incentive for program participation, staying within the dietary specifications for calories, sodium, saturated fat, and trans fat can be very difficult when extras are served daily. These foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal.

### **Standardized Recipes**

Standardized recipes are required for all menu items that have more than one ingredient (e.g. salad blend [iceberg lettuce with spinach]). A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. Recipes need to be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen (e.g. chicken noodle soup, beef vegetable soup). Guidance on what a standardized recipe should include can be found on our [Recipe Resources and Tools](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

### **Production Records**

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Furthermore, there was incomplete information, such as total number of purchase prepared, total number of portions prepared, planned portion size, and substitutions made to original plans. "1 ea." does not provide adequate information. Use volume measures (such as cups) to record portion sizes of fruits and vegetables, and using weight measures (such as ounces) to record portion sizes of meat/meat alternates and grains.

Be specific on production records about items served. Record the specific name of recipes and the brand name/description of purchased products including USDA Foods that count towards meeting the meal pattern requirements. List product codes for purchased items, including USDA Foods, to document what products were actually used. Record any extra menu items that will not be counted or are not creditable.

List the brands and flavors of breakfast bars offered, rather than "breakfast bar 1B" or "breakfast bar 2B", as these line items do not indicate exactly what was served. There is a wide variation in formulation of the many products in these categories. Fruit sizes (e.g. case count) should also be recorded.

[Instructions for completing production records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) can be found at the Production Records link under Meal Planning on the SNT website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).

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

### **Recipes for Cereal, Juice, and Other Breakfast Items**

If it becomes too time- or labor-intensive to record cereal, juice, or other breakfast item usage by type on production records, consider using recipes. Individual recipes document average cereal, juice, or other breakfast item usage by meal (breakfast or lunch) and grade group. When a cereal, juice, or other breakfast 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.

### **Weekly Grain Shortage - Alternate Meals at Sugar Creek Elementary**

Production records indicate students were offered an alternate meal during the review period consisting of string cheese, yogurt, Goldfish, and choice of fruit, vegetables, and milk (2.0 oz eq m/ma and 1.0 oz eq grain). Only one additional grain offered was offered with the alt meal, and students did not have access to other grains without selecting the entree (e.g. pizza). The alt meal met the daily minimum requirement but resulted in a weekly grain shortage. Serving 1.0 oz eq five days per week equals 5.0 oz eq grain per week. Including the 2.0 oz eq breadstick offered on December 13, Sugar Creek Elementary students were offered 7.0 oz eq, 1.0 oz eq short of the weekly minimum requirement of 8.0 oz eq grain per week.

### **Watermarked CN Labels**

A CN label with a watermark is used when the CN logo and contribution statement are used on product information other than the actual product carton and is presented as a separate document. Manufacturers may provide schools with a CN label with a watermark during the bidding process or on their websites. Original CN labels on product cartons will not have a watermark. Product information on the CN label with a watermark can be changed. CN labels must be verified and collected from boxes as products are delivered. Once labels have been collected, check when new shipments arrive to determine if crediting towards the meal pattern has changed.

### **Crediting - Weight versus Volume**

Meat/meat alternate, such as diced turkey, Philly beefsteak, and taco meat, must be credited by weight, not by volume (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.

### **In-House Yield**

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the school food authority's next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG (e.g. 163 count apples). [Specific and verifiable procedures](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf>), which must be followed, are available on the

[Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

### **Signage**

Signage must state that student must take at least 1/2 cup fruit, vegetable, or combination to constitute as a reimbursable meal. This statement was missing from signage at VAHS, K Wing Cafe, Stoner Prairie Elementary, and Sugar Creek Elementary.

Though signage for K Wing explained what constitutes a reimbursable meal and the requirement to select at least 1/2 cup fruit, vegetable, or combination, signage listed a choice of one fresh fruit or 1/2 cup canned fruit as well as 1/2 cup total vegetables. These statements are inconsistent with OVS requirements and with meal pattern requirements for the 9-12 age/grade group. By offering students a choice of one fresh fruit or 1/2 cup canned fruit, students do not have access to the full fruit component. Corn chips were mistakenly written beneath the vegetable component; there was no grain listed. Vegetable portion sizes were written as ounces rather than volume measures. Corrections were made to the sign prior to meal service.

### **Vegetable Subgroup Crediting**

Vegetables are consistently and incorrectly credited towards the dark green subgroup. Celery and green bell peppers credit towards the other subgroup, not the dark green subgroup. The romaine blend listed on production records does not contain any romaine lettuce; it contains iceberg lettuce, cabbage, and carrots. Therefore, the salad blend should be credited towards the other subgroup.

A standardized recipe needs to be created to reflect spinach added to the salad blend. Remember, leafy green vegetables credit as half of the volume served. The standardized recipe must list the volume of spinach in the total recipe yield. One-half of the volume of spinach served may credit towards the dark green subgroup. Likewise, the standardized recipe must list the volume of iceberg lettuce in the total recipe yield. Then, half the volume of iceberg served may be credited toward the other vegetable subgroup.

Alternatively, half the volume served of the total recipe yield may credit towards the other subgroup without separating the spinach from the iceberg lettuce.

Production records indicate 1/8 cup green peas were offered three times on the Pizza Line and the Soup & Salad Line during the review period. This resulted in an insufficient quantity of starchy vegetables (1/8 cup green peas offered three times per week equals 3/8 cup starchy vegetables). The weekly minimum requirement at lunch for 9-12 age/grade group is 1/2 cup.

Additionally, green peas were offered at VAHS on the day of review in 3.25 fluid ounce souffle cups. The planned serving size was 1/2 cup, per production records. A full 1/2 cup portion of peas needs to fill a 4 fluid ounce souffle cup. Inconsistent serving sizes and incorrect packaging can result in daily and weekly vegetable subgroup shortages.

### **Offer versus Serve**

At lunch, if only three components are selected, and two of these are fruit and vegetable, the student may only select the 1/2 cup portion for the fruit OR vegetable. For the other two components, the student must select at least the daily minimum required serving of the components for them to be counted. Three food components are required for an adequate nutritious meal for students and to warrant the Federal reimbursement. Within each component, different food items may be offered, giving students many combinations for building a reimbursable meal. Other than selecting the required minimum 1/2 cup fruit, vegetable, or combination serving, it is the student's choice to select or decline a food component.

## **Findings and Corrective Action Needed**

- ❑ **Meal Pattern Finding #1:** Daily and weekly minimum requirements for m/ma were not met for lunch during the review period on the Pizza Line as a result of Big Daddy Bold Pre-Sliced Pizza with Fat Reduced Pepperoni (78998) offered on Tuesday, December 12. Using the CN label from product packaging, product 78998 credits as 1.5 oz eq of m/ma and 2.0 oz eq of grain. As a result, there was a daily shortage of 0.5 oz eq m/ma and a weekly shortage of 0.5 oz eq m/ma.

**Corrective Action Needed:** Submit a label for a replacement product that meets the daily minimum requirements of 2.0 oz eq m/ma and 2.0 oz eq grain. **No further action required.**

**Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

- ❑ **Meal Pattern Finding #2:** Daily and weekly minimum requirements for m/ma were not met for lunch during the review period on the Sub Line. Eight subs on the Sub Line contributed to daily and weekly shortages of m/ma related to inaccurate crediting of provolone cheese slices and turkey pepperoni slices. Each slice of provolone cheese credited as 0.75 oz eq m/ma, and five slices of turkey pepperoni credited as 0.5 oz eq. The Meatball Sub, Ham and Cheese Sub, Philly Beef Sub, Sriracha Chicken Sub, Touchdown Sub, Verona Sub, Wisconsinite Sub, and Garden Sub ranged from 0.25 oz eq to 0.75 oz eq short of daily minimum requirement for m/ma, resulting in a total weekly shortage of 3.75 oz eq m/ma.

**Corrective Action Needed:** Submit updated standardized recipes for the eight subs listed above, which reflect corrected crediting of provolone cheese and turkey pepperoni and meet daily minimum requirements for m/ma. **No further action required.**

**Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

- ❑ **Meal Pattern Finding #3:** Daily minimum requirement for m/ma was not met for lunch during the review period in the K Wing as a result of 11 pieces of popcorn chicken offered on December 12. According to the CN label, 12 pieces of popcorn chicken credit as 2.0 oz eq m/ma and 1.0 oz eq grain; therefore, eleven pieces of popcorn credit as 1.75 oz eq m/ma and 0.75 oz eq grain. Eleven pieces of popcorn chicken were offered again on the day of review. Shredded cheese was offered but not recorded on the production records on day of review, which could have credited towards the m/ma component and met the daily minimum requirement. Students who selected popcorn chicken but not shredded cheese did not meet the daily minimum requirement, resulting in three non-reimbursable meals.

**Corrective Action Needed:** Please submit a written statement describing how you alter the menu to meet the daily minimum requirement for m/ma. Also address what steps will be taken to improve the accuracy of information recorded on production records.

**Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

- ❑ **Meal Pattern Finding #4:** An insufficient quantity of beans and peas (legumes) offered on the Sub Line, Soup & Salad Line, Pizza Line, K Wing, and K Wing Cafe during the review period. The weekly minimum requirement at lunch for 9-12 age/grade group is 1/2 cup.

Kronos Classic Hummus (code 383452) does not have a CN label. PFSs exist for crediting the hummus as m/ma; the submitted PFS for hummus crediting as a vegetable (beans and peas [legumes] subgroup) is inaccurate. During onsite review, the state agency attempted to contact Kronos three times. It is the SFA's responsibility to obtain current and accurate crediting information for each menu item credited towards the meal pattern. Hummus was the only bean and pea (legume) vegetable offered on the aforementioned service lines. Without current and accurate crediting documentation, Kronos Classic

Hummus cannot be credited as a bean and pea (legume) vegetable toward weekly requirements. This results in a vegetable subgroup shortage during the week of review.

**Corrective Action Needed:** Submit current and accurate documentation from Kronos crediting hummus as a vegetable. Alternatively, submit a menu planning worksheet for each meal service line (Sub Line, Soup & Salad Line, Pizza Line, K Wing, and K Wing Cafe) demonstrating how all vegetable subgroup requirements will be met for the reviewed menu. Menu planning worksheets are available for download as Microsoft Word Documents from the [SNT Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools>).

- Meal Pattern Finding #5:** An insufficient quantity of starchy vegetables offered on the Pizza Line and the Soup & Salad Line during the review period. The weekly minimum requirement at lunch for 9-12 age/grade group is 1/2 cup.

**Corrective Action Needed:** Please submit a menu planning worksheet for each meal service line (Pizza Line and Soup & Salad Line) demonstrating how all vegetable subgroup requirements will be met for the reviewed menu.

- Meal Pattern Finding #6:** Production records for breakfast and lunch for the review period are incomplete. All required information on the template must be documented for all menu items.

**Corrective Action Needed:** Submit three days of completed production records for breakfast and lunch for all service lines at Stoner Prairie Elementary, Sugar Creek Elementary, and VAHS (including K Wing). Include planned portion sizes for all items, as well as all other information on the “must haves” list.

- Meal Pattern Finding #7:** Recipes for chicken noodle soup, beef vegetable soup, and harvest salad are not standardized to the operation. A recipe for salad blend was not submitted nor provided onsite.

**Corrective Action Needed:** Submit standardized recipes for these four menu items, including recipe yields (serving size for single portion(s), total number of portions, and total volume or measure [gallons]).

- Meal Pattern Finding #8:** OVS is required at lunch at the high school level. According to the USDA lunch meal pattern for 9-12 age/grade group, one cup of fruit and one cup of vegetables must be offered. Under OVS, a student must select 1/2 cup fruit, vegetable, or combination as part of his or her reimbursable meal.

Food service staff on meal service lines at VAHS were observed placing additional individually packaged fruits and vegetables on student trays that already contained reimbursable meals. Per discussion with food service staff and the Assistant Food Service Director, students are required to select a minimum of 1 cup fruit, vegetable, or combination. This is an inappropriate modification of OVS. 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:** Watch the [Offer Versus Serve webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>) on the DPI School Nutrition Team webpage or comparable training with approval from the Public Health Nutritionist. Please submit a roster or checklist indicating all VAHS staff have viewed the webcast.

- Meal Pattern Finding #9:** Insufficient crediting documentation for Wild Mike’s pizza served during the review period.

**Corrective Action Needed:** Please submit an updated product formulation statement (PFS) for 16” Cheesy Bottom Cheese Pizza (code 20211) crediting as a grain, and for 16” Cheesy Bottom Pepperoni Pizza (code 20210) crediting as m/ma.

- ❑ **Meal Pattern Finding #10:** Alternative lunch meals at Sugar Creek Elementary during the week of review result in a weekly grain shortage.

**Corrective Action Needed:** Please submit completed lunch production records for one 5-day week at Sugar Creek demonstrating that 8 oz eq grains were served with all entree options over the course of a week.

- ❑ **Meal Pattern Finding #11:** More than 50% of fruit is served in the form of juice at breakfast at VAHS.

**Corrective Action Needed:** Please submit a written statement explaining how the menu will be altered to ensure that no more than 50% of fruit is offered in the form of juice.

### 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. The new 16-17 Annual Financial Report instructions are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>). The afterschool snack program labor expense are allocated incorrectly. Consider conducting a time study to more accurately allocate labor among lunch, breakfast, snack, and nonprogram foods.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.

##### 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>).

##### 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.

As a reminder, 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).

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

### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

❑ **Finding #1:** The 15-16 SY Annual Financial Report (AFR) ending fund balance does not match the 16-17 SY beginning fund balance of \$267,406.12.

**Corrective Action Needed:** Amend the 15-16 SY AFR by submitting the corrected beginning and ending fund balances to the DPI accountant via email or fax ([jacqueline.jordee@dpi.wi.gov](mailto:jacqueline.jordee@dpi.wi.gov) or 608-267-9207). Copy the nutrition program consultant on the communication.

### **Paid Lunch Equity (PLE)**

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

### **Revenue from Nonprogram Foods**

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

Verona School District nonprogram foods (a la carte, catering, etc.) appear to be supporting the program foods (lunch, breakfast, and Afterschool snack). The food service director has priced these items to cover all cost and revenues are making their way back to the food service account.

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

calculator.xlsx).

### **Resources**

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

### **Findings and Corrective Action Needed: Revenue from Nonprogram Foods**

❑ **Finding:** The Nonprogram Foods Revenue Tool has not been completed.

**Corrective Action Needed:** Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool using at a minimum, a 5-day reference period from the 1718 SY ([https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html)).

#### 4. GENERAL PROGRAM COMPLIANCE

##### Civil Rights

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

##### Nondiscrimination Statement

When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

##### 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.



## **Findings and Corrective Action Needed: Civil Rights**

- ❑ **Finding#1:** It was noted that meal prices for student meals (i.e., \$2.60, \$0.40, \$0.00) are visible on the computer screen that can be seen by students; this constitutes overt identification and should be remedied district-wide.

**Corrective Action Needed:** Submit a statement explaining how the “current purchase screen” will be hidden.

- ❑ **Finding #2:** Program materials do not contain the correct USDA non-discrimination statement.

**Corrective Action Needed:** Update the following program materials and submit copies via email to the nutrition consultant.

- Free and reduced price application approval/denial letters and direct certification approval letter
- Verification letters (We must Check & We have Checked)

## **Local Wellness Policy**

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

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**

At a minimum the wellness policy must include:

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

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\_finalrule.pdf).

- USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several wellness policy resources available, including a policy checklist, a wellness policy builder, toolkit, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

### **Findings and Corrective Action Needed: Local Wellness Policy**

**Finding:** SFA LWP meets some but not all requirements as stipulated above. The last update to the policy was 2006.

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

### **Smart Snacks in Schools**

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

Thank you to the Athletic Director, Assistant Food Service Director, and vending representative for answering questions in a timely manner, and providing documentation as need. The Assistant Director's prompt action and availability during the review is greatly appreciated. Thank you all for your dedication to providing students with nutritious Smart Snack items.

#### **Updating Crediting Documentation**

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. Product formulations change frequently, so it is important that crediting documentation on file is kept up-to-date. Documentation should be reviewed and updated at least twice per year and as new products are purchased or substituted. Records should only reflect the current items offered. Records should reflect all items currently offered.

Please note that as of July 2016, side items are limited to 200 mg sodium or less. Products assessed with the Alliance for a Healthier Generation Smart Snacks Product Calculator prior to July 2016 may no longer be Smart Snacks compliant.

#### **Future Fundraisers**

At the time of the on-site review there were no fundraisers taking place during the school day at VASD. 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 webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

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.

#### **Future Coffee Shops**

If coffee and espresso drinks are to be allowable beverages at the high school level, products must be offered in acceptable portion sizes to be compliant with the Smart Snacks standards. Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar needs to be added together when determining if the beverage meets the guidelines below.

### Resources

SNT recommends using the Alliance for a Healthier Generation Smart Snacks Product Calculator, found on the Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) to assess product compliance.

## Professional Standards

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

#### 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>). Alternatively, consider the USDA's new web-based [Professional Standards Trainer Tracking Tool](#).
- **Annual Training Requirements for All Staff**  
Directors: 12 hours  
Assistant Director: 10 hours  
Managers: 10 hours  
Other Staff (20 hours or more per week): 6 hours  
Part Time Staff (under 20 hours per week): 4 hours  
If hired January 1 or later, only half of the training hours are required during the first school year of employment.

## Water

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

Per [SP 28-2011](#), 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. When the agency begins building new school facilities—consider the following frequently asked questions about water availability:

1. Q. *The HHFKA requires potable water be “in the place where meals are served during meal service”. Can you provide additional detail on what this means?*

A. *The location of the potable water must be in the foodservice area or immediately adjacent to the meal service area. For example, if a school has a water fountain that is immediately outside the door to the foodservice area (and accessible to all students during the lunch period) this could be considered sufficient. The water fountain must be operational and able to provide potable water to students in a reasonable time during their meal period.*

### Reasonable Costs

1. Q. *What is considered “reasonable costs associated with providing water would be an allowable charge to the non-profit food service account?” For example, constructing fixed water fountains, major plumbing renovations, purchasing water dispensers, providing bottled water throughout the school, reverse osmosis machines.*

A. *Reasonable cost associated with providing water, in its nature and amount, is a cost that does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The cost must be the result of sound business practice and competitive prices. The cost must be reasonable, necessary, and allocable to the Federal school meal programs to be an allowable cost. In determining whether a cost is a reasonable and necessary cost associated with providing water, a school food authority (SFA) should ask the following questions:*

- *Would a prudent person find the cost to be reasonable?*
- *Is this cost at a fair rate or do alternatives exist that may be more cost effective?*
- *Is the cost a significant deviation from the established practices of the SFA which may unjustifiably increase costs borne by the nonprofit school food service account?*
- *Could the SFA defend this purchase to the State agency (SA)?*

*For example, the cost of providing pitchers or cups that would be filled with potable water from the faucet or providing them to students to fill with potable water from a faucet is a reasonable cost. Some schools may want to provide water bottles to students or other alternatives; however, the SFA would need to determine whether such an option would meet the requirements for cost allowability (i.e. necessary, reasonable, and allocable) and meet the specific needs of the SFA. **Additionally, a cost is generally not reasonable if it adds materially to the value of the school building and related facilities or appreciably prolongs its intended life, as those types of costs are capital expenditures and should be borne by the school district’s general fund. While the cost associated with major plumbing would likely add to the permanent value of the school building and is typically a cost that should be borne by the school district’s general fund, the addition of a water fountain to allow for compliance with the statutory potable water requirement makes the cost acceptable.** Moreover, equipment to filter water (e.g., a reverse osmosis filter system) could be reasonable depending on the cost, the need for such equipment, and if the SFA can show:*

- (1) that it has sufficient funds;*
- (2) that the district truly is lacking in capital improvement funding; and*
- (3) that the expenditure is necessary to carry out the mission of the program.*
- (4) It is difficult to assess reasonableness without knowledge of the specific cost and an understanding of that cost. Many costs have to be analyzed on a case-to case basis in order to determine if the cost is truly reasonable; in such cases, the SFA should consult with its SA for guidance.*

## Food Safety, Storage and Buy American

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

#### Food Safety Plans

- 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—staff should be trained on and familiar with all SOPs in the plan.

#### Sharing and No Thank You Tables

Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.

##### Sharing Table

A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table *during* the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

##### No Thank You Table

A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, a designated worker or trained individual must inspect the items for wholesomeness.

**Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.**

#### Considerations

1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
4. Parents will be informed in writing.
5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.

7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

### **Wholesome Leftovers**

Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. "Wholesome" must be defined by the SFA as part of the SOP.

**Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.**

Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

### **Monitoring Log**

Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

### **Findings and Corrective Action: Food Safety**

**Finding #1:** Uncategorized breakfast menu items into Process 1, 2, and 3 for all review sites.

**Corrective Action Needed:** Categorize all breakfast menu items on the chart for Menu Items Categorized by Process 1, 2, or 3. Submit updated chart for the review sites as an attachment to the Nutrition Program Consultant via email. Ensure updates are carried through district-wide.

**Finding #2:** No annual food safety plan review completed. Last updates were documented in 2013 and 2016.

**Corrective Action Needed:** Review entire food safety plan and update as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit just the completed [Food Safety Plan Review page](#) as an attachment to assigned DPI Nutrition Program Consultant via email.

### **Buy American**

- 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. 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 is identified on the label, than SFA must get certification from the distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can 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 the 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 the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure the product received and the 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](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) (https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) are found on the procurement webpage under Buy American.
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

### **Findings and Corrective Action Needed: Buy American**

- ❑ **Finding #1:** 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:
  - canned mandarin oranges (China)
  - canned diced pears (China)
  - canned fruit cocktail (China)
  - cucumbers (Mexico)
  - red bell peppers (Mexico)

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

## 5. OTHER FEDERAL PROGRAMS REVIEWS

### Afterschool Snacks

#### Commendations/Comments/Technical Assistance/Compliance Reminders

The high school afterschool snack program offers a wide-variety of snack options which is great. However, consider the ability of staff to accurately plan, credit and account for all of these items on the daily production record. As a reminder, a full fruit or vegetable component for snack is  $\frac{3}{4}$  of a cup, not  $\frac{1}{2}$  cup like the NSLP—they are also separate components under the [ASP meal pattern](#). Reviewer advised staff to remove multiple items prior to service that would not have met a full component and would have resulted in non-reimbursable snacks. Moving forward, you will either need to allow students to take additional items to meet a full component or plan singular items that meet the full  $\frac{3}{4}$  cup fruit or vegetable component on their own (e.g., larger apple count size).

#### Findings and Corrective Action Needed

✓ **Finding #1:** Afterschool snack attendance is not taken.

**Corrective Action Required:** Begin taking attendance. Due to the difficulty in taking daily attendance, DPI SNT has approved the use of a monthly attendance at Verona Area High School. By signing this report the agency agrees to take attendance. **No further action required.**

❑ **Finding #2:** Production records do not contain planned portion sizes, which are important for staff to determine the minimum amount needed to credit as a full component.

**Corrective Action Required:** Update the snack production record template with planned serving sizes for all items the agency plans to menu.

### Wisconsin School Day Milk Program (WSDMP)

#### Findings and Corrective Action: Wisconsin School Day Milk Program

❑ **Finding:** The district's paper contract completed in 1990 no longer reflects current practices and administration.

**Corrective Action Required:** Update the WSDMP contract by submitting a [paper contract](#) to [loriann.knapton@dpi.wi.gov](mailto:loriann.knapton@dpi.wi.gov). Copy the nutrition consultant on the communication.

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



*With School Nutrition Programs!*