

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

**School Food Authority: Beaver Dam Unified
School District**

Agency Code: 14-0336

Review Date(s): March 12-15, 2018

**School(s) Reviewed: Beaver Dam High School,
Lincoln Elementary School**

Date of Exit Conference: March 15, 2018

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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 Beaver Dam Unified School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review, which assisted us completing the visit in less time onsite. The new school nutrition director is ready to embrace program details.

The DPI review team appreciates the eagerness of the staff at Beaver Dam Unified School District for their willingness to make changes to meet school nutrition program regulations. We reviewed the Beaver Dam High School and Lincoln Elementary School. The district is concerned for the nutritional well-being of their students as evidenced through food safety, menu choices, different service models, local wellness and offering the school breakfast program at each site. We were impressed during meal service at Lincoln Elementary that students lined up for the entrée selection patiently and took fruits and vegetables from the salad bar without much prompting. The Lincoln Elementary staff assisting with lunch, meal servers, custodians, teachers and principal are involved in maintaining a nice cafeteria for the students.

Upon observation of the breakfast and lunch meal service at the Beaver Dam High School, it was noted that students are offered many entrée options for greater student participation. They are in the midst of a major construction project and are doing a great job of serving the students quality meals in a friendly manner, most of the time addressing each student by name. I appreciate that the breakfast cashier was pleasant to the students, saying, "See you at lunch!"

The DPI review team is confident that Beaver Dam Unified School District will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- The Determining Official is very thorough in application approval, direct certification and consolidating claims for meal and the milk program.
- A statistical sample of all students eligible for free or reduced meal benefits was run with four hundred seventy-five students confirmed. There were no errors in approving applications or direct certification matches for these 475 students and their households. **Very nice work!**
- Paper and electronic applications are reviewed and households notified usually less than the ten day period.
- Direct certification is run for all of the required time frames and several other runs to find eligible students.
- Applications are approved using the correct Income Eligibility Guidelines and income frequency periods, as well as knowing when to extend meal benefits to other household students.

- Application materials and other communications with households concerning eligibility determinations are 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.

Technical Assistance:

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically. If done through software, please check that the income levels are updated each year after July 1.
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>).
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to 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. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Compliance Reminders:

- The information letter to the parents must be sent to all households each year, after July 1 and before school starts to aid in completing an application for meal benefits.
- 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. If that is not complete or does not match the number of names, the application is incomplete and cannot be determined.
- Applications offered at district and school offices must be switched out to the current school year by July 1 to offer households the most current application packet.
- At this time, the only program names for case numbers entered on an application for free or reduced meal benefits allowed are Food Share, W-2 Cash Benefits and Food Distribution Program on Indian Reservations (FDPIR). Badger Care, Medicaid, WIC and other programs are not allowable program names to use for case numbers on applications.

Public Release

- The Public Release is not to be sent to households as it includes the specific income amounts for free or reduced benefits.
- 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.

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.
- 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:** The Determining Official must sign and date each paper application and a batch of electronic applications as they are processed.
Corrective Action Needed: Submit a statement describing the process the determining official will use for the application process in School Year 2018-19.

- **Finding #2:** The Confirming Official must sign and date each printed application which has been selected for the verification process.
Corrective Action Needed: Submit a statement of the process to complete this task beginning next school year.

- **Finding #3:** 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>). Currently, it appears that households automatically receive a waiver for some district fees, including registration, athletic fees, etc. by either completing an application for or being approved for free and reduced meals. This is unallowable! When household adults complete an application, they intend that it is for meals and only those in the administration of meal benefits will be privy to their application or meal status. When that information is used for some other purpose it breaches confidentiality. Household adults may accept offered benefits through a waiver annually where they can accept each individual waiver. This is usually completed with this [Sharing Information form](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>). Another option is for the household to “self-disclose” by bringing in a copy of their free/reduced approval notice or direct certification approval letter to the designated official operating the outside program.
Corrective Action Needed:
Submit a plan for School Year 2018-19 registration process to include a way for parents to accept subsequent benefits (if offered) after qualifying for free or reduced price meal benefits. Once the process is established, each person outside of the determining official, confirming official, verifying official and other school nutrition staff who “need to know” meal eligibility must complete a [Disclosure Agreement](#) to keep on file. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>) The information is only to be shared with other when a household adult has accepted the benefit, and the person administering the sharing of information has completed the disclosure agreement.

- **Finding #4:** All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc>). The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)

- Major employers contemplating or experiencing large layoffs
- Local Employment Office

Corrective Action Needed: Submit a plan for completing and distributing the Public Release sometime between July 1 and the start of school for School Year 2018-19, and where the document will be distributed.

Verification

Commendations:

- The confirming official has much experience with approving applications and understands the Skyward software system and reports needed.

Findings and Corrective Action Needed: Verification

- **Finding #5:** Three applications selected for Verification process were approved incorrectly; two had an incorrect program listed for the case number and one had the wrong number of household member names compared to the total number in the household.

Corrective Action Needed: These households must be changed to Paid status unless documentation can be obtained for income and household size approval. **All three were corrected onsite 3/15/18.**

Resources:

DPI created a [webcast about the verification process](#) and instructions to complete the Verification Collection Report (VCR) as found on the training webpage (<https://dpi.wi.gov/school-nutrition/training>).

Meal Counting and Claiming

Commendations:

- Thank you for using Skyward's Accuclaim edit check before submitting the claim.
- The district uses Skyward for meal counting and claiming, using PIN numbers and back-up systems, as needed.
- Cashiers are trained annually or more frequently, as necessary.
- Field trip meals are being offered for students; this is a link for more [Field Trip meal resources](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Technical Assistance:

- The Lincoln Elementary staff assisting with lunch selections should review the [Offer Versus Serve webcast](#) (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).
- Visiting student meals may be claimed in the paid meal category, rather than an adult price.

Compliance Reminders:

- Second lunch meals for students are not allowed to be charged as a unit, but must have individual components sold as a la carte. Only one lunch may be claimed per student per day; this was claimed correctly but noted separately on the Accuclaim report.

Findings and Corrective Action Needed: Meal Counting and Claiming

- **Finding #6:** When reconciling the February 2018 claims for breakfast and lunch, there was only one meal discrepancy which was a data entry error.

Corrective Action Needed: No corrective action needed. This error will be included in a meal calculator and may have fiscal action applied.

- **Finding #7:** It was noted that students were allowed to purchase a second meal which was charged at a higher price and not claimed. This is not allowed because any item sold to students outside of the reimbursable meal must meet Smart Snacks guidelines.

Corrective Action Needed: Submit a plan of how this practice will be discontinued. Since the high school kitchen/serving area will be moving into the new space after spring break, that is a great time to update the procedure. Please include other school sites in your plan; indicating how an edit check will be used at the elementary schools since second meals showed up on the Accuclaim report but students do not purchase a second meal at elementary schools.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all staff at Beaver Dam Unified School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director and Assistant Food Service Director for sending all documentation ahead of the onsite visit as this greatly expedited the AR. Beaver Dam does a nice job offering multiple menu options for the elementary students and the high school students including various entrees and fresh fruit and vegetables offerings. Great job on a perfect week of review for lunch at both the elementary and high school! Staff work well together to prepare and serve food and have a great rapport with students. Taher does a great job preparing multiple from-scratch meals for students to enjoy. Thank you for serving healthy, nutritious meals to the students of Beaver Dam!

Technical Assistance

Training

Anyone involved with the United States Department of Agriculture (USDA) School Meal Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free and reduced meal applications, meal pattern, and record keeping requirements. Travel and meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts).

Flavor Station

Currently, flavor stations have multiple shakers for students to add flavor to their meals, which all include sodium. Although these products are low-sodium, consider switching to sodium-free herbs and spices such as oregano, dried parsley, or garlic powder. This teaches students to add flavor to their food without the added sodium.

Offer versus Serve (OVS)

Although zero non-reimbursable meals were observed during the day of review, staff were making students select more than they needed and are not being trained on OVS on a consistent basis. It is important that staff understand the OVS requirements for student satisfaction and food cost and food waste control. Consider watching this [OVS Webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html) for a quick refresher (<https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html>).

Fundraisers

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 this may not occur in the meal service area during meal service times. Fundraisers selling compliant products have no selling restrictions.

Fruit, Bananas

The minimum requirement for fruit offerings at the high school level (9-12) is 1.0 cup of fruit, daily. During the day of onsite, only bananas were put out on the line before service, which credit as ½ cup of fruit. Staff indicated that students are able to select two, which meets the 1.0 cup fruit offering for the day. Although this is allowable, the intent of the NSLP is to teach students healthy eating habits, which include eating a wide variety of fruits and vegetables. Expecting a student to select and consume two bananas is not the intent of the program. Consider adding a second fruit offering to the menu so students have a variety from which to choose. Before service, apples and oranges were added to the line, but put by the point of service. Ideally, these fruit offerings should be placed on the main line by the other fruit so students have a chance to select from a variety.

Weight versus Volume

Meat/meat alternates and grains are credited by ounce equivalents (oz. eq.) and fruit and vegetables are credited by volume. A serving size of ¼ cup (2 fluid ounce (fl. oz.)) should not be measured by weighing out 2 ounces. At the elementary school, the salsa had a serving size of ¼ cup (2 fl. oz.), but was being weighed out by 2 ounces. Make sure to use a 2 fl. oz. spoodle as this is volume, not weight. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fl. oz. spoodle for an intended 4 ounce (by weight) serving of ground/diced/shredded meat. To ensure that students receive the adequate amount of food components, make sure to weigh the meat/meat alternates and grains, and portion out the fruits and vegetables by volume.

Corrective Action

- Finding # MP 1:** There was a daily fruit shortage at breakfast with the nutrition break during the week of review. Only ½ cup of fruit was recorded daily on production records. A full 1 cup is required to be offered daily at breakfast under the K-12 meal pattern. Because of the daily fruit shortage, there was also a weekly fruit shortage (2 ½ cups planned; minimum 5 cups required).
Corrective Action Needed: Please state what you will do to the nutrition break menu so that a full 1 cup of fruit (or vegetable, or a combination of both) is planned daily, and 5 cups of fruit is planned weekly.

- Finding # MP 2:** Although no non-reimbursable meals were observed during the days of onsite review, many students were made to take more than what they needed at both breakfast and lunch. The breakfast and lunch Offer versus Serve (OVS) requirements are not fully understood by all staff at the point of service.

Corrective Action Needed: Have staff responsible for determining reimbursable meals attend a training on OVS. The [lunch meal pattern](http://dpi.wi.gov/school-) (<http://dpi.wi.gov/school->

nutrition/training/webcasts#lunch) and [OVS](http://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (<http://dpi.wi.gov/school-nutrition/training/webcasts#ovs>) webcasts may be used, or another training of your choosing. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Compliance Reminders:

Annual Financial Report (AFR)

- Because of the Nonprogram Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all lumped into Purchased Services as was previously allowed for FSMC operated SFAs. SFAs are required to annually complete the Nonprogram Foods Revenue Tool, using [USDA version](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls) or [DPI calculator](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).
- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be allocated to the program to which they belong. This needs to be shared annually to the director of business services.
- The Director of Business Services revised the nonprogram foods expenses breakdown in the annual financial report for SY 2016-17. She will review the Wisconsin School Day Milk Program (WSDMP) and School Breakfast Program expenses at the end of this school year.
- The district has a negative balance policy communicated to all households. 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; this is the summary of information [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). The food service staff, especially cashiers, will review the policy and enforce the rules or ask the district for clarification.

Food Service Management Company (FSMC)

- The following duties may not be delegated to the FSMC, as outlined in the following [memo](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-40-2016-attachment.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-40-2016-attachment.pdf>):
 - Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year. It is due February 1 annually and the documents are kept onsite.
 - Signature Authority – a representative of the SFA must sign off on the contracts for the SFA
 - Edit Checks- an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software.
- **(TA) The FSMC must develop an Advisory Board**, consisting of parents, teachers and students to assist in menu planning, per [USDA Memo SP 40-2016](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-40-2016-attachment.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-40-2016-attachment.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- **Finding #8:** As required for a comprehensive review of the nonprofit school food service account, the SFA must submit one full month's worth of expenses for the food service fund.
Corrective Action Needed: Submit a monthly expense detail report to the consultant for review.
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Paid Lunch Equity (PLE)

Technical Assistance:

- The district is at the equity level for the weighted average paid lunch price (\$2.86). However, the district may be required to increase paid lunch prices for school year 2018-19 if USDA increases the equity level.
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Revenue from Non-program Foods

Commendations:

- The NonProgram Food Revenue tool was completed by school nutrition staff.

Technical Assistance:

Revenue from Nonprogram Foods

- For SFAs operated by a Food Service Management Company (FSMC), the FSMC must annually provide information on food costs and revenues. The information must include food cost for reimbursable meals, food cost for non-program foods, revenue from non-program foods, and total revenue. Nonprogram foods include: a la carte; catering; vending; and student stores operated, or any other sales generated through the nonprofit school food service account not already described. This information is used to determine compliance with revenue from nonprogram foods at 7 CFR 201.14(f).
 - Milks purchased by students with a paid/normal meal/milk eligibility must be entered in revenue and expenses in the nonprogram foods category for the WSDMP. The cost of milk and reimbursements for free and reduced eligible students in WSDMP must only be claimed for that program.
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Indirect Costs

Compliance Reminders:

- In Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school, like fuel for delivery vehicles.
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4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

- The "And Justice for All" poster is posted in public view where the program is offered.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Technical Assistance:

- Civil rights training was conducted for school nutrition staff who administer any portion of a school nutrition program. When the training takes place early next school year, provide the training for the registrar/confirming official/verifying official, any translators and secretaries who have access to applications submitted by households.

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 full statement (<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. The menu has the correct statement.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. Include this in the district procedures to ensure compliance.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. Refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

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>).

Findings and Corrective Action Needed: Civil Rights

- Finding #9:** The letter templates to be sent to households must have the [nondiscrimination statement](#) changed to match the complete version and same size font as other parts of the letter, even if it goes to two pages (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc>).

Corrective Action Needed: Submit a copy of the corrected letter template for one of the notification letters to households, but change the free and reduced versions of all notification letters to households, including the verification letters.

- **Finding #10:** The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) form is required to be completed by October 31 annually; this is the PI-1441 document (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).
Corrective Action Needed: Submit a plan to complete this report annually and keep on file at the SFA for review during an administrative review.
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On-site Monitoring

Compliance Reminders:

- Every school year, each SFA with more than one school must perform at least one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).
- The lunch onsite monitoring forms have been completed for all nine school sites, although past the February 1 deadline. These were completed with the director of business services along with another district employee and a Food Service Management Company staff member.

Findings and Corrective Action Needed: Onsite Monitoring

- **Finding #11:** Onsite monitoring forms for the school breakfast programs have not been completed.
Corrective Action Needed: Complete the onsite monitoring for the breakfast programs in 50% of the breakfast sites (5), to include Lincoln Elementary and Beaver Dam High School; send just a copy of these two sites. Also submit a statement of how this process will be completed in the future.
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Local Wellness Policy

Commendations:

- The district's local wellness policy was recently updated in 2017 and is compliant at this time.

Compliance Reminders:

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.
 - (TA) At next local wellness policy review, please review a precise goal for nutrition promotion, nutrition education, and review food and beverage marketing in schools and the adherence to the Smart Snacks rule.
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Smart Snacks in Schools

Compliance Reminders:

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that became effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage at (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Findings and Corrective Action Needed: Smart Snacks in Schools

- **Finding #12:** The hot cocoa mix does not meet smart snack standards for beverages. The product has 80 calories for 8 fl. oz., which is too high in calories. Below are the beverage guidelines:
 - Calorie-free beverages (for black coffee only)
 - <5 calories per 8 fl. oz.; ≤10 calories per 20 fl. oz.
 - Maximum serving size: 20 fl. oz.
 - Lower-calorie beverages (for coffee with cream and/or sugar, or hot cocoa)
 - ≤40 calories per 8 fl. oz.; ≤60 calories per 12 fl. oz.
 - Maximum serving size: 12 fl. Oz.

Corrective Action Needed: Please state what you will do to ensure the hot cocoa mix is not sold a la carte to students. Include a timeframe in which this will be complete.

Professional Standards

Commendations:

- The Taher staff track the school nutrition training hours in the USDA tracker form. Many have completed the required number of hours for the 2017-18 school year or will complete by June 30, 2018.
- A new director was hired in February, meeting the requirements per the Professional Standards rule.

Technical Assistance:

- When tracking continuing education hours, please include the registrar and director of business services since they serve in school nutrition roles.

Compliance Reminders:

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- 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.
- 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.

- **Annual Training Requirements for All Staff:**
Directors: 12 hours
Managers: 10 hours
Other Staff (20 hours or more per week): 6 hours
Part Time Staff (under 20 hours per week): 4 hours
If hired January 1 or later, only half of the training hours are required during the first school year of employment.
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Food Safety, Storage and Buy American

Commendations:

- The food safety plans at the school sites were complete with Standard Operating Procedures (SOP), list of employees and equipment and process 1-2-3 foods. The SOPs which do not apply to individual sites, may be removed, like afterschool snacks.
- Cooling equipment, sanitizer logs and thermometer calibration logs are kept up-to-date.

Technical Assistance:

- [A Flash of Food Safety](http://www.fns.usda.gov/ofs/food-safety-flashes) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.
- The SFA uses “Time As a Public Health Control” for time/temperature control for safety (TCS) foods.

Compliance Reminders:

- (TA) Food safety inspection reports must be posted in public view. If there are multiple pages, please post each page.
- The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, farmers, and provides healthy choices for children in the USDA School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification.
- 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: Food Safety, Storage and Buy American

- **Finding # MP 3:** 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:
 - Grape Tomatoes (Mexico)
 - Fenugreek (India)
 - Sweet & Sour Sauce (Canada)

Corrective Action Needed: Begin using a Non-compliant Product form for tracking non-domestic products. Provide a copy of the form that will be used and include any non-compliant

products currently in the SFAs food storage areas. A [Template Form](#) from DPI's Procurement webpage may be used (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

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

Commendations:

- School Breakfast is promoted in the Back-to-School newsletter and monthly menus.
- Since Beaver Dam Unified School District participates in the Summer Food Service Program, this SFA promotes the program with flyers, banners and mailing to parents.

Technical Assistance:

- Consider ideas to promote participation in the breakfast program at all schools, since each are eligible for the addition "severe need breakfast" reimbursement, this year at 34 cents.
 - Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](#) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).
 - (TA) Separate costs for the Summer Food Service Program are required in different categories; check expenses and revenues annually against the AIDS register.
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5. OTHER PROGRAM REVIEW

Wisconsin School Day Milk Program (WSDMP)

Commendations:

- The custodian delivers the correct number of milks in time for milk break in the classrooms.

Technical Assistance:

- Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded as the students receive the milk. It was observed in two classrooms at Lincoln Elementary School that milk selections are entered into Skyward at attendance time in the morning. It is important to mark the milk as the student receives it with a separate check off sheet. Perhaps the process can be completed with a printout of students signed up for milk on a given day and marked off when the student receives the milk, then the teacher would confirm the Skyward mark of milk for the student account activity.
- The [WSDMP application](#) on file is out-dated and must be revised (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc>).

Findings and Corrective Action Needed: WSDMP

- Finding #13:** Milks must be recorded as the student receives the milk in the cafeteria or classroom. They may be pre-marked in Skyward, but must be verified at milk break time.

Corrective Action Needed: Evaluate the WSDMP milk classroom claiming process for School Year 2018-19 and submit a [revised contract](https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc) with the DPI consultant (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc>). The process just needs to be more defined that milks are counted when the student receives the milk at break time.

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



With School Nutrition Programs!