

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Horicon School District

Agency Code: 142576

School(s) Reviewed: Horicon Junior High School

Review Date(s): 3/19/18–3/22/18

Date of Exit Conference: 3/21/18

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state 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, professional standards, meal benefit determination process, 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, and 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 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Horicon School District for the courtesies extended to during the on-site review. Thank you for being available when answering questions and providing 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.

The work spaces provided were well-equipped and allowed for productive work time. The staff were accommodating and welcoming.

It is clear that the staff members across the SFA are dedicated to collaboration and teamwork in order to ensure adequate services for students.

Thank you to the office staff members and food service director who took the time to compile and send requested information prior to the on-site review. Questions were quickly, and thoughtfully answered both off- and on-site.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Of the 154 eligibility determinations reviewed, no errors were identified. Great job to all officials involved! Additionally, it was clear that the officials involved took necessary steps to clarify or obtain more information when parts of applications were incomplete.

Technical Assistance:

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.

Free and Reduced Price Meal Application Income Frequency

- When an application has multiple income frequencies listed, the income should be annualized before a determination is made. On the other hand, when an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year.

Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).

- The SFA currently utilizes an optional sharing of information form that allows parents to consent to having their meal benefits shared for the purpose of various fee waivers. This practice meets the requirements described above.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Verification

Commendations:

- The verification process was completed thoroughly, correctly, and on time. The verification tracker was used to track all verification activities which made the process easy to follow. The Verifying Official took care to follow up with the household when clarification was needed in order to complete the process accurately.

Technical Assistance:

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application. When verification is completed, the Verifying Official must sign and date the back of the application in the designated area.
- The Confirming Official does not need to review and sign all applications submitted—only those selected for verification.

Findings and Corrective Action Needed: Verification

❑ Finding A: The individuals designated as the Confirming Officials on the online contract are not the staff members that actually complete the confirmation review of applications selected for verification.

Corrective Action Needed for Finding A: Update the online contract to reflect the names of the officials that are responsible for each role. Notify the consultant when the contract has been updated.

Meal Counting and Claiming

Commendations:

- The edit check process meets all requirements, appears accurate, and involves a review by a school official before submitted for reimbursement by the FSMC.
- The SFA offers field trip meals to ensure students have access to nutritious lunches while off-site for field trips. The counting and claiming process for field trip meals meets the requirements for an accurate point of service.

Technical Assistance:

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

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

- Thank you to the food service director at Horicon Junior High School for providing thorough, organized meal pattern documentation prior to the onsite review, as this greatly expedited the onsite review process. Both the food service director and the registered dietitian from Taher were extremely helpful and friendly during the onsite review, and were quick to fix problems. Meals were appealing and tasty, and students took a nice selection of fruits and vegetables. Thank you to all the food service staff for your hard work!

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding B:** The posted breakfast signage did not contain a statement communicating the Offer versus Serve (OVS) requirement of ½ cup fruit and/or vegetable.

Corrective Action Needed for Finding B: Please submit a photo of posted signage that contains the necessary OVS information.

- **CA completed onsite; no further action needed. Thank you!**

❑ **Finding C:** Small bottles of water are offered with the reimbursable meal and are served out of the milk cooler. It is not clear whether students are aware that they can take milk and water, but no students were observed selecting both. A water dispenser is located in another area of the service line, so the bottled water is not necessary to meet the potable water requirement. If food service wants to continue to offer bottled water without charging for it, there must be a plan in place to ensure that students know that they do not have to choose milk or water. Milk is its own component and water cannot be offered in its place. A sign could be posted above the milk cooler saying “You may select milk and water.”

Corrective Action Needed for Finding C: Please submit a written statement explaining how you will communicate to students that bottled water is not being offered in place of milk, and that they may select both milk and water if they would like.

3. RESOURCE MANAGEMENT

Non-Profit School Food Service Account

Technical Assistance

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for non-program food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

FSMC

- Because of the Non-program Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all placed into Purchased Services as was previously done for SFAs with FSMC contracts.

- SFAs must annually be provided information on food costs and revenues from Food Service Management Companies (FSMC). The information must include food cost for reimbursable meals, food cost for non-program food, revenue from non-program food, and total revenue to determine SFA compliance with non-program food revenue requirements.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found on our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- The SFA has a written policy in place, however it is recommended to make the policy more specific during future revisions so that it accurately communicates to households how negative account balances will be handled.
- The policy must be distributed in writing to all households in the SFA. Posting the policy on the school website is not an adequate distribution method, as it does not guarantee that all households receive the information. Please reference SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) for acceptable methods of communication with families (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).

Findings and Corrective Action Needed: Non-Profit School Food Service Account

❑ Finding D: The unpaid meal charge policy is posted on the school’s website, but has not been distributed in writing to all households.

Corrective Action Needed for Finding D: Please provide a statement detailing how the SFA will distribute the paid meal charge policy to all households in writing for the next school year, and going forward.

❑ Finding E: The AFR from SY 16-17 shows a negative non-program foods balance. Non-program foods may not be supported by reimbursable meals (program foods) or have a non-program food loss absorbed by the food service account.

Corrective Action Needed for Finding E: The negative non-program food balance must be investigated and corrected. Determine if the revenues and expenditures have been correctly allocated. If allocations are correct and there is a negative non-program food balance, a transfer from a non-food

service account into food service will be required. If allocations are incorrect and the balance is positive, no transfer is required but the AFR must be corrected in accordance with process in the proceeding Finding F and corrective action. Corrected non-program foods revenue assessment using the non-program food revenue tool will assist in determining if these foods are currently priced high enough to cover their associated costs. Email the consultant when this has been resolved and appropriate action has been taken, as outlined above.

❑ **Finding F:** On the Annual Financial Report, the revenues and expenses were not broken out appropriately by category and were disproportionately recorded in Purchased Services.

Corrective Action Needed for Finding F: Please resubmit your 16-17 Annual Financial Report with revenues and expenses broken out by program and category. To do this, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update. Email the consultant when completed.

Revenue from Non-Program Foods

Technical Assistance:

Non-Program Foods Revenue

- Non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Non-program Food costs and revenues must be separated from Program food costs and revenues.
- Since non-program foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.

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

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

Adult Meals

- The prices for adult lunch and breakfast established at the beginning of the school year and listed on the approved online contract are not high enough to meet USDA pricing requirements. Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. See corrective action below.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates

(2017-18 SY) should be used to determine adult prices.

Findings and Corrective Action Needed: Revenue From Non-Program Foods

❑ **Finding G:** Adult lunch and breakfast prices were found not to be high enough to meet USDA pricing requirements.

Corrective Action Needed for Finding G: Use the adult meal pricing worksheet described above to assist in determining the new, compliant adult meal prices. Update the online contract accordingly with the new, increased prices. Please be sure to adequately advertise the adjusted prices to adults that may be purchasing the meals offered.

- **CA completed prior to on-site visit; no further action needed. Thank you!**

❑ **Finding H:** The SFA completed the non-program foods revenue tool for a five day reference period in February 2018. However, the tool was not completed correctly and thus did not accurately indicate whether or not non-program foods revenue requirements were being met.

Corrective Action Needed for Finding H: Reference the [Financial Management webpage](#) for assistance in correcting the tool (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>). Please correct the tool and submit completed tool to the consultant.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

- Thank you for utilizing screen protectors at the point of sale to eliminate visibility of student lunch prices on the screen. Cashiers must be able to view item prices in order to enforce the unpaid meal charge policy, so the screen protectors are used to prevent overt identification for passersby.

Technical Assistance:

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. Civil rights training had been attended by all staff in the schools and documentation was available for review.

Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) 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>)
- 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.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Findings and Corrective Action Needed: Civil Rights

❑ **Finding I:** While the correct version of the public release was used and published in a local newspaper, it was not sent to any grassroots organizations (such as local food pantries, public library, WIC clinics, etc).

Corrective Action Needed for Finding I: Provide a statement detailing how the SFA will meet the public release distribution requirements for the next school year and going forward.

Local Wellness Policy

Commendations:

- The SFA is clearly dedicated to student and community wellness as evidenced by their involvement in the county-wide Blue Zone initiative. Discussions with school personnel indicated that Blue Zone involvement has supported the local wellness policy and aided in implementation of wellness initiatives on school campuses.

Technical Assistance:

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
 - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
 - Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
 - Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
 - Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
 - Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
 - Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
 - Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).
- During future revisions of the wellness policy, language about food and beverage marketing will need to be added because it is now a required content area. Recommended additions also include direct references to Smarter Lunchroom techniques, Smart Snacks, and Healthy Hunger-Free Kids Act of 2010 as opposed to simply referencing other school polices that may contain this information.

Triennial Assessment

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum.
- The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place.
- To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources).
- Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017).
- Additional information about interpreting your school's report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](http://wellsat.org/)) for assistance in assessing the LWP (http://wellsat.org/).

Resources:

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

Smart Snacks

Technical Assistance:

Food and Beverage Fundraisers

- At the time of the on-site review there were no food or beverage fundraisers held at Horicon Junior High school, per a discussion with the school principal. If any food or beverage fundraisers are held during the school day in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines or must qualify as an exempt fundraiser. A staff member the school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Vending Machines

- Snack and beverage vending machines are located in the hallway of the junior/senior high school. The only vending machine that is on during the school day is one that sells 12 fluid ounce skim chocolate milk, which is compliant with the Smart Snacks guidelines. The other machines are turned off from midnight until 3:45 p.m., which is 30 minutes after the end of the school day. Thank you to the principal at Horicon Junior/Senior High School for operating in compliance with the regulations!

Professional Standards

Technical Assistance:

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- Annual Training Requirements for All Staff
 - Directors: 12 hours
 - Managers: 10 hours
 - Other Staff (20 hours or more per week): 6 hours
 - Part Time Staff (under 20 hours per week): 4 hours
 - If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Non-Nutrition Staff with School Nutrition Duties

- The bookkeeper and both school secretaries that only process applications are currently not required to complete annual training hours. Civil rights training is required and has been completed by the school secretaries. If school nutrition duties change, professional standards requirements may apply. Please reference the [Professional Standards webpage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf>).
- The secretary at the elementary school that is responsible for the point of sale during lunch service is subject to 4 hours of annual training. Because this person is the last person to check students' trays for reimbursable meals after they walk through the salad/garden bar, professional standards apply. The district office secretary is also subject to 4 hours of annual training due to the range of duties pertaining to school meal programs.

Findings and Corrective Action Needed: Professional Standards

Finding J: Training is not being monitored on a tracking tool for non-nutrition staff with school nutrition duties that are subject to 4 annual training hours.

Corrective Action Needed for Finding J: Include all current training hours for each non-nutrition staff member with school nutrition duties on a tracking tool and submit to consultant. Please note that annual civil rights training and time spent on tasks related to the administrative review can be counted as training hours. A link to a template tracking tool is provided above.

Water

Commendations:

- A visually appealing drink dispenser filled with lemon water was available for student use during breakfast and lunch. Students were observed utilizing the dispenser throughout meal service.

Buy American

Commendations:

- The food service director at Horicon Junior High School has completed the noncompliant product list for several nondomestic products; great work!

Technical Assistance:

- The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted in an email. Technical assistance was given on checking your distributor's website to see if products are identified as being products of the U.S.
- There are limited exceptions to the Buy American provision which allow for the purchase of nondomestic products 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. In these cases, food service must complete a noncompliant product list for each nondomestic product to justify its purchase.
- More information can be found on our [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

❑ Finding K: The following products were identified in the SFA's storage area as nondomestic and not listed on the SFA's Buy American – Noncompliant List:

- Frozen red rhubarb – Poland
- Frozen California blend vegetables – Mexico

Corrective Action Needed for Finding K: Complete a Noncompliant Product List for these nondomestic products. Provide the completed list for the above products as corrective action. A [template form](#) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

- ***CA completed onsite; no further action needed. Thank you!***

Food Safety

Commendations:

- It was evident that the food service director takes food safety seriously and maintains the food safety plan. When questioned about items listed on recent sanitation inspections by the local sanitarian, the food service director was eager to show how steps had been taken to improve upon findings.

Technical Assistance:

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>). See corrective action below.

- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Findings and Corrective Action Needed: Food Safety

❑ **Finding L:** Signed employee health reporting agreements were not available.

Corrective Action Needed for Finding L: Obtain signed agreements from all food handlers in the SFA.

- **CA completed onsite; no further action needed. Thank you!**

Reporting and Recordkeeping

Commendations

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

Summer Food Service Program (SFSP)

Commendations:

- Thank you to Horicon School District for offering free summer meals to children in the community. The district does a great job promoting this program as well.

Technical Assistance:

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Some additional ideas for how SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

School Breakfast Program (SBP) Outreach

Technical Assistance:

- The breakfast participation is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (http://dpi.wi.gov/school-nutrition/school-breakfast-program). A [Breakfast in the Classroom](#)

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

- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).
- For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.
 - [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
 - [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

5. OTHER PROGRAM REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Technical Assistance:

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5th grade. Only milks served to students eligible for free or reduced price meals can be claimed under this program. Milks served to paid students are considered non-program foods and cannot be claimed under this program. See corrective action below.
- It is important to know the distinctions between WSDMP and the Special Milk Program, especially when both programs are offered in the SFA. Please reference the [Milk Programs webpage](https://dpi.wi.gov/school-nutrition/milk-programs) for the details of each program (<https://dpi.wi.gov/school-nutrition/milk-programs>).

Findings and Corrective Action Needed: WSDMP

❑ **Finding M:** Prior to the on-site review, it was noted that the WSDMP claim submitted for the school year 16-17 was completed using numbers from the Special Milk Program. Because the claim could not be amended before it was paid out, the SFA was awarded reimbursement only for the 8 milks claimed for SY 16-17.

Corrective Action Needed for Finding M: The claim preparer should review the [WSDMP webpage](https://dpi.wi.gov/school-nutrition/milk-programs/wisconsin-school-day-milk) (<https://dpi.wi.gov/school-nutrition/milk-programs/wisconsin-school-day-milk>) and the [Milk Program Comparison Chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smp-wsdmp-comparison-chart.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smp-wsdmp-comparison-chart.pdf>). After reviewing the resources, please submit a statement to the consultant indicating understanding of the differences of the WSDMP and the SMP program.

❑ **Finding N:** During validation of the WSDMP claim on-site, it was discovered that milk served to paid students had been claimed under WSDMP in addition to milk served to free and reduced students. Paid milks are not eligible for reimbursement under this program. This error was noted to be a systemic error, thus requiring a reclaim for 852 milks claimed improperly dating back three years plus the current year (which includes claiming errors dating back to the 2014-15 school year for the program). A reclaim will be calculated in order to recover funds from the SFA that were paid for non-reimbursable milks. The error noted in the previous Finding N of underclaiming by only claiming 8 milks for the school year 16-17 WSDMP has been accounted for in the reclaim calculation.

Corrective Action Needed for Finding N: The claim preparer should review the [WSDMP claiming manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wsdmp-en-claims-manual.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wsdmp-en-claims-manual.pdf) and provide a statement to the consultant detailing how WSDMP claims will be properly completed going forward.

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

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

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



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