

Administrative Review Summary Report

School Food Authority: Dodgeland School District

Agency Code: 142744

School(s) Reviewed: Dodgeland High School

Review Date(s): December 12-14, 2017

Date of Exit Conference: Dec. 14, 2017

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 Dodgeland School District for the courtesies extended to us 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. Cathy Lamb should be commended for her efforts regarding the NSLP. She is knowledgeable and displays a positive attitude regarding the nutrition program. Cathy was very helpful through the review process. The food service staff display a kind and caring manner to students and did a nice job of providing meals to students and staff. Thank-you to Laura Grossman for her assistance regarding the finances of the nutrition program. Finally, a sincere thank-you to Annette Thompson the district's administrator for friendly and positive manner she offered to the review team.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application. **Technical assistance** was provided.

Household Size Box

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

Verification

Verification is only required when eligibility is determined through the application process, and is not required for eligibility determinations made through the direct certification process. Each year schools must annually verify eligibility of children from a sample of household applications approved free and reduced price benefits for that school year. Once the sample pool is determined, the LEA calculates the sample size, or the number of applications that must be verified. When calculating the sample size, all fractions or decimals are rounded upward to the nearest whole number. At least one application must always be verified. **Technical assistance** was provided.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.

Disclosure

- 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, 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>). **Technical assistance** was required.

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ Finding: The finding was that some applications were missing the number of total household members in the required reporting field. These households need to be followed up before determining applications. These findings are recorded on the SFA 1 form.

Corrective Action Needed: Please contact households to confirm household member size. When the applications are corrected this will be recorded on the SFA 1 form. **Corrected on-site, no further action needed.**

❑ Finding: The finding was that the applications chosen for verification did not meet the required sample size. Two applications were randomly selected but the requirement based on the sampling size was that three applications needed to be verified.

Corrective Action Needed: Please review the Eligibility manual and the Verification webpage on the DPI website for guidance on selecting the correct number of applications to meet the required sample size for the verification process. **Please submit a statement of understanding regarding selection of the applications based on the sampling size.**

❑ Finding: The finding was that the *Sharing of information* letter was more of a blanket waiver. It listed miscellaneous fee waivers.

Corrective Action Needed: Please be more specific of miscellaneous fees and break out accordingly in the *Sharing of information* letter. Please submit a copy of an updated version of this letter.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk or perhaps just an entrée as an example, this is not a reimbursable meal and these items are to be charged as an a la carte item. **Technical assistance** was required.

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ **Finding:** The finding was that when a meal selected by students was considered non-reimbursable, students were still being charged for a meal that was reimbursable but not claimed by the SFA.

Corrective Action Needed: Technical assistance was required informing director that when a meal is considered non-reimbursable, the food items that are taken must then be charged as a non-program food (A la carte) purchase and each food item charged individual. **Please submit a detailed statement on how this will be corrected.**

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at Dodgeland High School for the warm welcome. You provide appealing and healthy meals to all of your students. Thank you to the food service director for sending meal pattern documentation prior to the on-site review. Your time and communication is appreciated. Color-coding the reimbursable meal components is a great way to communicate with students.

Comments/Technical Assistance/Compliance Reminders

Dietary Specifications (Sodium)

Some canned vegetables and soups found in dry storage are not low sodium or no sodium. These canned products contain high amounts of sodium, which contributes to the weekly sodium allowance of ≤ 1420 mg. Resources containing facts about sodium and how to reduce sodium in meals are available on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#sodium) webpage, under the Sodium heading. (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#sodium).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding 1:** At the time of the on-site review, standardized recipes were missing for several of the foods offered during the week of review. Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

Corrective Action Needed: Please submit an updated standardized recipe for the following:

- Chicken tetrazzini
- Chicken or turkey and noodles
 - Chicken and noodles
 - Turkey and noodles
- Ground beef and macaroni (with Mexican seasoning)
- Chicken patty sandwich
- Mushrooms & onions
- Bean soup
- Beef vegetable soup

- Chicken or turkey rice soup
 - Chicken rice soup
 - Turkey rice soup
- Ham and cheese deli sandwich
- Turkey deli wrap
- Turkey deli sandwich
- Hot ham & cheese on a WG bun
- Tacos
 - Hard shell tacos
 - Soft shell tacos
- Mozzarella toast
- Breakfast slider
- White chicken chili
- Tuna noodles

☐ **Finding 2:** Grades 9-12 must be offered a minimum of 2 ounce equivalents (oz eq) grains per day and 10 oz eq per week. See the [meal pattern tables](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables) for more information (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables).

Some recipes offered to students are made from out-of-date USDA recipes. Keep in mind that the crediting has changed from 14.75 grams of creditable grain per serving to 16 grams of creditable grain per serving. When following the ingredient quantities listed in a USDA recipe, crediting information is not guaranteed to be current. For assistance in crediting grains/breads products, you can utilize the [USDA Whole Grain Resource](https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf) (https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf).

The weekly minimum requirement for grain was not met because of multiple daily grain shortages. The total amount of grains offered during the review week is 8.0 oz eq. There was a daily grain shortage at the high school on:

- MONDAY 11/13: If a student selects the Mexican beef and macaroni (0.75 oz eq from noodles) and the 1 dinner roll (1 oz eq) they only have access to 1.75 oz eq of grains that day
- TUESDAY 11/14: If a student selects 2 hard shell tacos (0.5 oz eq for 2 shells), he or she only has access to 0.5 oz eq of grains that day
- THURSDAY 11/16: If a student selects the chicken and noodles (0.75 oz eq from noodles) and the 1 dinner roll (1 oz eq) he or she only has access to 1.75 oz eq of grains that day

Corrective Action Needed: Please submit a written statement explaining how you will alter the menu to offer 2 oz eq grains on days that Mexican beef and macaroni, hard shell tacos, and chicken and noodles are offered.

☐ **Finding 3: Production Records**

Fruit: The specific type(s) of fruit offered, along with planned portion size(s), must be included to document this component was planned and served.

Milk: Milk is a required component as part of the National School Lunch Program. You must record daily usage by milk type on your production records.

Soup and Salad Bar: Planned portion sizes are required for every meal component, including components from the salad/soup bar. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Please refer to the [Production Record Requirement](#)

[list](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records)

Condiments: You must record daily usage by condiment type on your production records. You must also record portion size per condiment.

Grade Groups: Grade-group appropriate production records must be used to document meal pattern requirements per grade grouping. To assist with this process, use applicable grade-grouped production records found on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage, under the Menu Planning Worksheets heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

[3 Grade Groups- Lunch](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-lunch-three-grade-groups.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-lunch-three-grade-groups.doc)

[2 Grade Groups- Breakfast](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-breakfast-two-grade-groups.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-breakfast-two-grade-groups.doc)

While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). A copy of the production record requirements (“Must haves and Nice to haves” list) can also be found at that link.

Corrective Action Needed: Submit one 5-day week of completed production records.

❑ **Finding 4:** Breakfast signage was not posted and filled in with the daily menu. It is required to post signage visible to the students that indicates the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable.

The breakfast signage should list the three components and the four items offered, and must communicate to students that under Offer versus Serve, they must select at least three food items, one of which must be at least ½ cup of fruit, vegetable, or a combination of fruit and vegetable. The number of food items that each menu item was planned as nor the number of items from each component that students could select was displayed. It is up to the menu planner to determine in advance whether items crediting as 2.0 oz eq count as one or two food items at breakfast. He or she must clearly communicate to students what foods they can(must) select in order to have three food items for a reimbursable breakfast. For example, the bagel served on the day of observation was 2.0 oz eq, so it could be counted as either one or two food items.

Signage examples can be found on our [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Corrective Action Needed: Provide a photo of appropriate breakfast signage hung in the food service area.

❑ **Finding 5:** Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. Some students observed at lunch/breakfast did not take a reimbursable meal. It is important for staff to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) is available on our website (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf).

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

❑ **Finding 6:** Because the vegetables on the salad bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. Signage should be used at the salad bar to communicate to students the combination and amount of M/MA, grains, fruits/vegetables, or milk they are required to take to make a reimbursable meal.

Corrective Action Needed: Provide a photo of the appropriate portion sizes and component combinations required for a reimbursable meal hung near the salad bar.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding:** The finding was that the annual financial report's beginning and ending balances were not matching. This was due to commodities not being including in the annual financial report.

Corrective Action Needed: Please correct the report for the 16/17 SY and resubmit. **Please notify reviewer when it has been submitted.**

❑ **Finding:** The finding was that non-program foods was not being broken out into the non-program foods (A la carte) category for expenses and revenues.

Corrective Action Needed: If possible correct last year's annual financial report to reflect breakout of non-program foods. Please submit a statement of understanding regarding the breakout of non-program foods for the annual financial report.

Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

Resources

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

Findings and Corrective Action Needed: Revenue From Nonprogram Foods

❑ **Finding:** The finding was that non-program food revenue tool was not completed. In addition to non-program foods (A la carte) there is some catering occurring in the SFA. USDA requires a non-program

foods revenue tool to be completed when non-program foods are sold which includes catering events and vending machine sales.

Corrective Action Needed: Please submitted a completed USDA non-program revenue tool.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).
- However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

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. **Technical assistance** was provided.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

Civil Rights Complaints

- 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 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 Complain Form](#) for assistance in filing these complaints, which can be (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Special Dietary Needs

- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner 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>).

Overt Identification

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

Findings and Corrective Action Needed: Civil Rights

Finding: The finding was that there was no listing of a non-discrimination statement on the printed menu for students.

Corrective Action Needed: Please submit a copy of a printed menu with the non-discrimination statement listed on it.

Finding: The finding was that there was no civil rights training this current school year for food service employees.

Corrective Action Needed: Please submit a copy of a roster of all foodservice staff and any non-foodservice staff that have duties in food service.

Finding: The finding was that the non-discrimination statement on the Direct Certification letter, and the letters used in the Verification process did not have the correct font and format. The statement on these letters has to be the same font and format as the letter content.

Corrective Action Needed: Please submit copies of each of these letters with the corrected statement in the correct font and format.

Finding: The finding was that there was overt Identification on the computer screens at the point of service.

Corrective Action Needed: Please contact the software vendor for assistance to correct this. This was corrected on-site.

Local Wellness Policy

Commendations/Comments/Technical Assistance/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 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

Content of the Wellness Policy

At a minimum the wellness policy must include:

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*. This can be accessed electronically at <http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>. LWPs should include specific goals related to:

- 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).

Please refer to the USDA [summary of the requirements](#) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>). For further assistance contact Alicia Dill at alicia.dill@dpi.wi.gov or 608-266-2741 or Kelly Williams at Kelly.williams@dpi.wi.gov or 608-267-9120.

Findings and Corrective Action Needed: Local Wellness Policy

□ Finding: The finding was that the current Wellness Policy has not been yet updated to meet current regulations. The District is working on updating the policy to meet regulation requirements. Technical assistance and resources were provided to assist with updating the policy.

Corrective Action Needed: Please submit a statement outlining a timeline to meet compliance with the Wellness policy requirements.

Smart Snacks

Thank you to the Food Service Director for your dedication to providing students with healthy and approved a la carte items. Thank you for selecting Smart Snack compliant beverages for your vending machines that are accessible for all students to choose from. Your efforts to ensure healthy offerings is appreciated. The administrative staff was receptive to information shared.

Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Smart Snacks

❑ **Finding 1:** Common Grounds sells beverages (such as cappuccinos and iced coffee) and baked goods (such as brownies and muffins) that are not Smart Snack Compliant.

Ongoing unhealthy food and/or beverage fundraiser within schools is discouraged, as it does not align with the intentions of Smart Snacks standards and the Healthy Hunger-Free Kids Act. Constant unhealthy food and/or beverage fundraisers undermine progress made as a school nutrition department, and district, to provide healthy, balanced meals to students. Whenever possible, the district is strongly encouraged to help student organizations find ways to fundraise that promote a healthy lifestyle. More information on healthy fundraisers can be found on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Corrective Action Needed for Finding 1: Please submit a written plan explaining how you will alter the selection of non-program foods sold to students so that Smart Snack guidelines are met for all items.

Professional Standards

Commendations/Comments/Technical Assistance/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.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).

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, 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.

Findings and Corrective Action Needed: Professional Standards

Finding: The finding was training is not being documented on a tracking tool.

Corrective Action Needed: Please provide a tracking tool, which lists all staff, and any training that has occurred. Please include all requirements for a tracking tool.

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

Dodgeland is commended for having six water fountains available in the food service area.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). In addition, visit the [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Food Employee Reporting Agreements

- 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. Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. **Technical assistance** was required.

General Food Safety

- During our on-site visit, we noticed improper glove use with one of the food service workers during one of the meal services. Cross contamination is a major concern in school food service. In order to avoid this from happening, it is required that all food service staff follow the food safety standard operating procedures (SOP). SOP #3 – *No bare hand contact when handling ready to eat foods* can be found in the food safety manual which provides guidance for proper glove usage. **Technical assistance** was provided.

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>). **Technical assistance** was required.

Findings and Corrective Action Needed: Food Safety and Buy American

❑ Finding: The finding was that the school was not using non-compliant forms. The school was found to have several non-compliant food items.

Corrective Action Needed: Please submit a statement moving forward how the SFA will track non-compliant food products. Please a copy of what the SFA will be using with a product listed.

❑ Finding: There is an Employee Reporting Agreement Form in the food safety manual; however, the finding was that food service employees had not reviewed and signed this form.

Corrective Action Needed: Each employee in the Food Service Department must read and sign this form and it must be retained this for compliance. This should be done each time a new employee is hired. Anytime there is a change in the form, this needs to be updated and signed by all the food service employees. Please submit a copy of the form for each employee to show that this requirement has been completed.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

All free and reduced price applications, including applications from households with denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

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

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

SFAs can inform families of summer meals via the following methods:

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

Resources:

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

Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

- The Wisconsin School Day Milk Program (WSDMP) was created by the Wisconsin Legislature to reimburse schools for a portion of their costs for serving milk at a milk break to Pre-Kindergarten through Grade 5 students who are eligible for free or reduced price meals. Only one half-pint of milk may be claimed per eligible student per school day. By state law, no charge can be made to those students who qualify for free and reduced price meals and are receiving free milk under the WSDMP.
- Milk served to paid students at the milk break in Grades PreK through 5, and students in Grades 6-12, is not eligible for reimbursement. If milk served to students is claimed under the federal Special Milk Program (SMP), it may not be claimed under the WSDMP. Per the Agreement, the SFA agrees that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid.

Findings and Corrective Action Needed: WSDMP

❑ **Finding:** The finding was that the POS for the WSDM needs to be a consistent procedure as it was noted there was a difference in how different classrooms handled the POS process. It was also noted that the milk cooler was not properly closed or regularly monitored during the time students received milk. **Technical assistance** was required.

Corrective Action Needed: Please submit a statement on how this process for the POS will be corrected.

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>).

