

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

School Food Authority: Lomira School District

Agency Code: 14-3171

School(s) Reviewed: Lomira Junior High School

Review Date(s): April 25-26, 2018

Date of Exit Conference: April 26, 2018

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at the Lomira School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff to make changes and to meet school nutrition program regulations. All staff were very approachable and willing to listen to all information offered.

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

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance (TA)/Compliance Reminders

169 eligibility determinations were reviewed, zero (0) errors were identified. Nice job!

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 the eligibility is determined by the Determining Official.**
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits for which the eligibility had been determined.
 - **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>).**
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households

that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically. If done through software, please check that the income levels are updated each year after July 1.
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>).

Household Size Box

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

Incomplete Applications

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

Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies

only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

Public Release

- **All SFAs are required to distribute a [Public Release](#) before the start of the school year (<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.**

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](#) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Direct Certification

- **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 .**
- **The effective eligibility date for a DC eligible student is the date of the original output file. The original output file, with the headers, including match date, must be saved. The date of the match is the date of eligibility.**
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.

- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year.
- **Lomira had a 0% certification error rate.** More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA.

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>).
- 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>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** Direct Certification match files are being saved without all required information.
Corrective Action Needed: Please provide a statement of understanding that before a match file is saved, that it will contain the appropriate, required information, as the date of the match is the eligibility date and the code is the type of eligibility.
- ❑ **Finding #2:** The district is requiring the completion of a meal benefit application for determining such local initiatives such fee waiver without obtaining *prior* parental consent. Local officials with access to free and reduced data do not have USDA disclosure agreements on file.
Corrective Action Needed: Discontinue this practice of requiring the completion of a meal application for fee waiver information. Submit a written statement explaining how the district will handle/improve free and reduced data disclosure moving forward, with regard to fee waivers/reductions.

Reviewer suggests implementing a notice, direct certification approval letter or the use of a [Sharing of Information Form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) to be presented to the designated official operating the outside program. This option removes food service from these types of requests and is preferred. A [disclosure agreement form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) is available on DPI's website for anyone working outside of food service, who is determined to need access to this information (e.g., IT, secretaries handling local fee waivers, staff handling state/federal reporting individual F/R data). The goal is to limit the number of people who need to know this information and make sure these individuals understand the consequences of improper sharing/release of this information.

Note: aggregate data (just F/R numbers or percentages without a connection to individual names does not require prior parental sign-off before sharing and often times satisfies the request).

Verification

Comments/Technical Assistance (TA)/Compliance Reminders

- 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.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** Correct number of applications not verified. Percent of sample size is always round up to nearest whole number. The sample size should have been 3, but 2 applications were verified. Verification occurs only on eligibility determined through the submission of an application-either on-line or in-person.
Corrective Action Needed: Please provide a statement of understanding regarding how sample size for verification is determined. Information on establishing the sample size is found on page 99 of the current year eligibility manual.
- ❑ **Finding #2:** Many of the denied applications had income annualized.
Corrective Action Needed: Please provide a statement of understanding that, going forward, all applications (electronic or paper) will not have frequency of income converted to annual for determination, unless more than one frequency of income is reported.
- ❑ **Finding #3:** Applications chosen for verification were not confirmed, not signed by the confirming official nor signed by verifying official.
Corrective Action Needed: Please provide a statement of understanding that, going forward, all applications chosen for verification will be confirmed, signed by confirming official and then signed by verifying official when the process is complete.

Meal Counting and Claiming

Comments/Technical Assistance (TA)/Compliance Reminders

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission. Though the current POS shows 3 schools within the same entity, a cafeteria code can be applied to the data for a site to ensure only the requested grade group is within the edit check. It is strongly recommended that each school (as listed on the on-line contract) has its own entity. The requirement for site-based claiming requires an edit check by site.
- Meals must be offered to all students each day school is in session a full day, so DPI has created Field Trip meal resources to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).
- The meal counting and claim for the Review Month was conducted perfectly.
- 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.
- REMINDER: 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, this is not a reimbursable meal and will be charged for the milk as an a la carte item.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals Lomira School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. School nutrition professionals were welcoming and friendly to DPI SNT reviewers and to students throughout breakfast and lunch meal services. The meal service areas were stocked with multiple options for entrees and sides as part of reimbursable meals and with foods and beverages that comply with Smart Snacks standards. Special thanks for the assistance of two school nutrition professionals who helped credit salads and wraps. The Food Service Director recognizes strengths and areas of opportunity in the Child Nutrition Programs and school nutrition professionals she supervises. During her first year in the Lomira School District, she expanded menu offerings to include grab and go and empowered staff to take ownership of the kitchen and POS.

Technical Assistance and Program Requirement Reminders

Non-Reimbursable Meals

Three students at Lomira Junior High School selected non-reimbursable meals during breakfast meal observation on April 25. Students' meals contained fewer than three items and/or did not contain ½ cup fruit, vegetable, or combination. Two students at Lomira Junior High School selected non-reimbursable meals during lunch meal observation on April 25. Students' meals contained fewer than three full components, though the students selected ½ cup fruit, vegetable, or combination. Meat/meat alternate (m/ma), grain, and/or milk were not present in full components. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

Signage

Adequate signage helps students accurately select reimbursable meals by indicating clearly to students how many items at breakfast or components at lunch must be taken to constitute a reimbursable meal. Printed 8.5" x 11" signage, depicting MyPlate, was available on top the meal service lines. It may benefit students to update and to reposition this signage lower. In contrast to My Plate, which identifies protein and dairy as food groups, the HHFKA meal pattern identifies meat/meat alternate and milk as components. These terms are not interchangeable.

Signage is especially helpful when students are self-serving foods, such as lettuce on the salad bar or French fries on the main meal service line. When vegetables on the salad bar contribute towards weekly vegetable subgroup requirements, portion sizes of at least 1/8 cup each must be communicated to students. Proper portion size utensils, such as spoodles, encourage students to take the planned portion and the amount required as part of a reimbursable meal. Consider posting a picture of a tray showing the amount the menu planner expects the students to take.

If you are interested in ordering signage from SNT, please visit the [Team Nutrition](https://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

Portion Control

Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e. the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches children good eating habits by demonstrating and providing appropriate portion sizes of each food group at a meal. Proper portion control also ensures a reimbursable meal is served, so students receive the planned quantity of the food component (e.g. two ounce equivalents [oz eq] of grain) or nutrients. Food costs are controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase.

Proper portion size utensils should be used. Scoops and spoodles are used to serve fruit, mashed potatoes, rice, and more. They measure different serving sizes and are numbered to differentiate the sizes, such as #8 (1/2 cup), #16 (1/4 cup), etc. The handles are often color-coded; ask the manufacturer for a reference to help correctly identify each scoop size. Slotted, pierced, or perforated spoodles are important for serving foods prepared in liquid when you do not want to add the liquid to the portion. If a tool does not measure, it is not a portion size utensil (e.g. tongs, spatulas, spoons).

Offer versus Serve (OVS)

All five components are equally important to a reimbursable meal. Under OVS, a student must select three of five components offered, including 1/2 cup fruit and or vegetable, as part of his or her reimbursable meal. He or she may decline the entrée, which is often the grain and/or meat/meat alternate component, in favor of fruit, vegetables, and milk.

School nutrition professionals were somewhat unclear about the OVS requirements for breakfast and lunch. As a reminder, all reimbursable meals must include selection of 1/2 cup fruit, 1/2 cup vegetable, or 1/2 cup combination. One-half cup combination means the student selected some fruit, some vegetable, and two other full components.

The [Offer Versus Serve Guidance manual](#) is available on our NSLP requirement website under the offer versus serve heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>).

Vegetable Subgroup Requirements

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each meal service line must be planned to meet the daily as well as weekly meal pattern requirements, including vegetable subgroups. This guidance can be found in the following documents.

DPI SNT's [Lunch in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf)

Each serving line must meet the daily and weekly requirements, including vegetable subgroups, independently. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>).

Memo SP 10-2012 (v.9) Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs"

2. When multiple serving lines are used in a school, must each line meet the weekly vegetable subgroup requirement?

Yes, in most cafeteria set-ups. As required in Section 210.10(k)(2), each independent line must meet the daily and weekly requirements (including subgroups), in order to ensure that a child is able to take a reimbursable meal every day in any line they may choose. (pg. 37) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf>).

There are three meal service lines for lunch at Lomira Junior High School. All foods are self-service. Students move freely between meal service lines, providing access to a variety of vegetables from all subgroups per weekly meal pattern requirements, such as hot vegetables (e.g. baked beans, French fries, etc.) on the main line and a salad bar on the a la carte line. Consider offering a variety of vegetables on *each* meal service line to increase the likelihood students will select vegetables from multiple subgroups without visiting multiple meal service lines.

USDA Meal Patterns

Planned portion sizes for grades 6-12 are inappropriately combined on lunch production records. Separating these students is critical to ensuring minimum daily and weekly requirements are met within the dietary specifications appropriate to each age/grade group at the Lomira School District. The lunch meal patterns for 6-8 and 9-12 grades may be used, or the lunch meal patterns for K-8 and 9-12 grades may be used. The breakfast meal pattern for K-12 grades may be served to students of the Lomira School District. Meal service is structured to comply with the required age/grade group meal pattern requirements.

Production Records and Standardized Recipes

Crediting information recorded on the production records was not consistently in agreement with crediting information on the supporting documentation, such as Child Nutrition (CN) labels, product formulation statements, standardized recipes, or the Food Buying Guide. Including meal pattern contributions for specified grade groups on production records is not required, though it must be documented and available for staff.

The following discrepancies were identified in crediting recipes from the review period:

- Turkey on a Whole Grain Pretzel Bun – 1.5 oz eq of m/ma
- Turkey Ham and Cheese Wrap – 1.5 oz eq of m/ma
- Turkey Swiss Wrap – 2.25 oz eq of m/ma
- Chicken Chipotle Salad – 1.25 oz eq of m/ma, 0.5 oz eq of grain from the Honey Sriracha Breaded Chicken

- Chef Salad – 1.5 oz eq of m/ma
- Turkey and Cheese Sub – 1.5 oz eq of m/ma
- Taco Salad – 2.75 oz eq of m/ma, 2.5 oz eq of grain
- Ham and Cheese Croissant – 1.75 oz eq of m/ma

As Lomira School District utilizes a district-wide menu, the Food Service Director must recognize the impact of these crediting discrepancies on the USDA lunch meal pattern for the 9-12 age/grade group. Though multiple other m/ma and grain menu items are available daily, students who decline those menu items might not have three full components at the POS when selecting only an entrée (see above) and ½ cup fruit, vegetable, or combination.

Recipes must be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen. Technical assistance was given for the recipe standardization process. Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements.

Continue to work towards recipe standardization, and use all resources available to you. Visit our [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional information (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) or [contact a Public Health Nutritionist](https://dpi.wi.gov/school-nutrition/directory) for assistance (https://dpi.wi.gov/school-nutrition/directory). We encourage viewing [the webcast, What's the Yield with Standardized Recipes?](http://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (http://dpi.wi.gov/school-nutrition/training/webcasts#sr).

Production records are intended to be useful tools to record information prior to production, during production, and following production. Production records submitted for the review period were considered not to be filled in completely. Continue working with all staff members to record planned usage, actual usage, and leftovers.

The breakfast and lunch production record templates currently in use are missing required information, such as serving site, menu type (lists both), and USDA meal pattern age/grade groupings. 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) was provided to the Food Service Director while onsite.

In-House Yield

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

Weight versus Volume

Use cup volume amounts when recording portion sizes on the production records for fruits and vegetables. Fruit sizes (e.g. case count) should also be recorded. This is the easiest way to ensure the meal pattern requirements are met. Weight and volume may not be used interchangeably for crediting purposes.

Food Buying Guide

The [USDA Food Buying Guide for School Meal Programs](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods). Foods that do not have standards of identity are not listed in the Food Buying Guide and require further documentation (a CN label or a product formulation statement [PFS]) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs. Refer to the Food Buying Guide for more details on how specific foods and ingredients credit toward the meal pattern (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>). The [Food Buying Guide Mobile App](https://www.fns.usda.gov/tn/food-buying-guide-mobile-app) provides quick access to food yield information to help you make quick purchasing decisions from your mobile device (<https://www.fns.usda.gov/tn/food-buying-guide-mobile-app>).

Crediting Documentation

A CN label or PFS is required for any combination food, m/ma, or other processed food not found in the [USDA Food Buying Guide for Child Nutrition Programs](https://foodbuyingguide.fns.usda.gov) (<https://foodbuyingguide.fns.usda.gov>). A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that include these four things. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label. More information is available on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

When a CN label is not available for a product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in Child Nutrition Programs. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is required that this documentation is printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).

Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

Pepperoni

The PFS for Wild Mike's Whole Grain 16" Pepperoni Pizza w/ Cheesy Bottom Crust 20210 10-Cut inappropriately credits pepperoni towards the meat/meat alternate component. Per USDA memorandum TA 05-2011, dried pepperoni may credit when used as a topping on CN labeled pizza. As Wild Mike's pepperoni pizza does not have a CN label, the pepperoni may not credit towards daily and weekly meal pattern requirements.

Training Recommendation

Anyone involved with the USDA Child Nutrition Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times during the school year. Classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements, including Offer Versus Serve and Adding It Up. Travel and meal expenses are allowable

food service expenses. Information on upcoming trainings can be found on DPI's [Training webpage](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast webpage](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts).

Corrective Action

Meal Pattern Finding #1: The weekly minimum requirement for m/ma was not met for lunch during the review period. The following represent the minimum oz eq of m/ma offered each day during the review period:

- Monday – Turkey on a Whole Grain Pretzel Bun, Turkey Ham and Cheese Wrap, and Chipotle Salad, 1.5 oz eq each
- Tuesday – Wild Mike's Pizza, Chef Salad, 1.5 oz eq each
- Wednesday – Turkey Ham and Cheese Wrap, 1.5 oz eq
- Thursday – Turkey and Cheese Sub, 1.5 oz eq
- Friday – Ham and Cheese Croissant – 1.75 oz eq

The weekly minimum requirement is 9.0 oz eq; 7.75 oz eq were offered during the review period. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Submit a statement describing how you will meet the weekly minimum requirement going forward.

Meal Pattern Finding #2: Planned portion sizes for grades 6-12 are inappropriately combined on lunch production records. Separating these students is critical to ensuring minimum daily and weekly requirements are met within the dietary specifications appropriate to each age/grade group at the Lomira School District.

Required Corrective Action: Please refer to the required corrective action under Meal Pattern Finding #3.

Meal Pattern Finding #3: The breakfast and lunch production record templates currently in use are missing required information.

Required Corrective Action: Submit three complete days of breakfast and lunch production records updated to include the missing required information. Lunch production records must demonstrate separation of grades 6-8 and 9-12 to reflect USDA lunch meal patterns for grades 6-8 and 9-12 or for grades K-8 and 9-12.

Meal Pattern Finding #4: School nutrition professionals will benefit from additional OVS training.

Required Corrective Action: Watch the [USDA Hot Topic: Meal or No Meal - Offer vs. Serve webcast](https://schoolnutrition.org/education/webinars/on-demand/usda-hot-topic-meal-or-no-meal--offer-vs-serve-simplified/) (https://schoolnutrition.org/education/webinars/on-demand/usda-hot-topic-meal-or-no-meal--offer-vs-serve-simplified/) from the School Nutrition Association or comparable training with approval from the Public Health Nutritionist. Please submit a roster or checklist indicating all school nutrition professionals have viewed the webcast.

Meal Pattern Finding #5: Yield and crediting errors were noted in the standardized recipes for Turkey on a Whole Grain Pretzel Bun, Turkey Ham and Cheese Wrap, Turkey Swiss Wrap, Chicken Chipotle Salad, Chef Salad, Turkey and Cheese Sub, Taco Salad, and Ham and Cheese Croissant.

Required Corrective Action: Submit updated standardized recipes for one sandwich, one wrap, and one salad from the list above, which reflect corrected yield and crediting as applicable.

Smart Snacks

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. More information is available on the [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>).

Entrées, snacks, and sides must meet one of the following criteria: be a whole grain-rich product; have a fruit, vegetable, dairy product, or protein food (meat, beans, poultry, etc.) as the first ingredient; or be a combination food with at least ¼ cup fruit and/or vegetable. Nutrient standards should be assessed for the serving size available for purchase and include all accompaniments.

- **Foods that do not meet Smart Snacks standards**
 - **Not whole grain-rich (WGR)** - *Foods that meet the WGR criteria contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. WGR products list a whole grain first in the product ingredient declaration, indicating whole grains are the primary ingredient by weight.*
 - Lorna Doone 100 Calorie Packs
 - Oreo 100 Calorie Packs
 - **Exceed calorie standards**
 - Crunchmania cereal, all varieties

DPI SNT recommends using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator) (<https://foodplanner.healthiergeneration.org/calculator>) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records. Stapling a complete nutrition facts label with ingredient statement to the printout is a best practice.

Smart Snacks Finding #1: Three foods sold a la carte were determined to be non-compliant with Smart Snacks standards.

Required Corrective Action: Indicate in a written response intentions regarding evaluating all foods and beverages for sale a la carte, keeping necessary documentation, using inventories of non-compliant products, and purchasing compliant replacement products.

Buy American

There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product
 - e. Distribution- record the reason the distributor carries the non-domestic product
 - f. Other- explain

You may record additional information if you find it beneficial.

A suggested template is found on the [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage under Buy American Non-complaint Product list (Word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

If no country of origin is identified on label, then the SFA must get certification from 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 within an email.

The label should indicate if the product is grown, processed, and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

Finding: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Canned tropical fruit from Thailand
- Cucumbers from Mexico

Required Corrective Action: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant address financial topics with the controller, including how to locate the agency's Child Nutrition Program report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

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 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 the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).**
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- 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”. While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.
- **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” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “nonprogram foods”, report 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, a la carte, and caterings would also be included here.
 - When revenues are recorded from the federal reimbursement payments, 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 an NSLP food expenditure for private schools and a purchased service for public schools.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).
- 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot 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
- **The district has an unpaid meal charge policy. The language of the negative lunch policy should be updated regarding:**
 - **How milk is charged.** Milk is not free with a meal. Milk is one component (of five required to be offered at lunch) and is included with the meal when a reimbursable meal is served. Milk sold outside of a reimbursable meal (for those eating lunch outside of the Child Nutrition Program or purchasing as an extra), has a per unit charge.
 - **Alternate meals.** The language is confusing as to when a family would start being charged for that meal and also conflicts with what actually happens in the lunch line (no alternate meals are offered for negative balances). It is necessary, per the nonprogram foods rule, that alternate meals, if offered, are funded; either by the student or nonfederal funds. If an alternate meal is claimed for reimbursement, it must meet the meal pattern for a reimbursable meal.
- 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>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- **Finding #1:** On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category.
Corrective Action Needed: Please provide a statement of understanding, going forward, that all expenses and revenues will be separated by program and expense category.

Paid Lunch Equity (PLE)

Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- **Great job running this tool!** The SFA’s current weighted average for 2017-18 SY tool is \$2.20.
- The 2017-2018 federal equity is \$2.82.
- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the PLE ‘In a Nutshell’ for more information on the PLE tool.
- Refer to the most recent guidance memo from USDA.
- Refer to the most recent memo from DPI.
- Step by step instructions to completing the PLE tool can be found on our financial website under Paid Lunch Equity.

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)/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 costs** associated with nonprogram foods, 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. Non-federal funds must be transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- **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>). On the DPI, 5-day tool, if the number showing in Cell V. causes the cell to turn green, the SFA is in compliance with the rule. If the number in that cell causes the cell to be red, the district is not in compliance with the nonprogram foods rule and will need to increase prices or choose to transfer money into food service to cover the deficit.**

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

- 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.
- 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.

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 paid lunch milks from the WSDMP, which are nonprogram foods, are not being funded.
Corrective Action Needed: Please provide a plan for how these costs will be covered, going forward.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

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

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered.

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.

Civil Rights Self-Compliance Form

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

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.

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 (i.e., \$2.25, .40, 0.00) are visible on the computer screen that can be seen by students; this constitutes overt identification.

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).

Findings and Corrective Action Needed: Civil Rights

- Finding #1:** Public Release not submitted to 3 organizations: media, grass roots organizations or major employer/unemployment office.
Corrective Action Needed: Please provide a statement of understanding regarding the posting requirements of the Public Release.
- Finding #2:** POS sales screen provides overt identification by showing meal prices on the screen.
Corrective Action Needed: Please correct the sales screen at the review site and send a screen shot of the corrected screen, for both breakfast and lunch, as the corrective action.
- Finding #3:** District does not have a complaint policy for USDA CNPs
Corrective Action Needed: Please provide a timeline for bringing this into compliance.
- Finding #4:** USDA nondiscrimination statement not on menu boards.
Corrective Actions Needed: Please remove all boards with incorrect statement and provide pictures of new boards in place as corrective action.

- ❑ **Finding #5:** PI-1441, Civil Rights data, not completed.

Corrective Action Needed: Please provide a statement of understanding that the PI-1441 will be completed by October 31 of each year and kept on-site.

Local Wellness Policy

Comments/Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

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

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial

assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Resources:

- Please refer to the USDA [summary of the requirements](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>).

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding #1:** SFA LWP meets some but not all requirements as stipulated above. It is missing language for public involvement, food provided but not sold, food and beverage marketing, evidence-based nutrition promotion, triennial assessment and updating and informing the public.
Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule.

Professional Standards

Comments/Technical Assistance (TA)/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 the 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>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: New Food Service Director Hiring Requirements

SFA Enrollment under 500	SFA Enrollment under 2,499	SFA Enrollment 2,500 – 9,999	SFA Enrollment > 10,000
*High school diploma (or GED) and at least 1 year relevant experience in school nutrition	*High school diploma (or GED) and at least 3 years relevant experience in school nutrition	*Associate degree (or equivalent) with related academic major and at least 2 years of relevant experience in school nutrition	*Bachelor's degree (or equivalent) in any academic major and at least 5 years experience in school nutrition
In addition, new directors are required to obtain at least 8 hours of food safety training, either not more than 5 years prior to their starting date or completed within 30 days of their start date.			
*Note: These are minimum standards. Reference USDA's summary of the Professional Standards Final Rule for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/profstandards_flyer.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, 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.

Food Safety and Storage

Comments/Technical Assistance (TA)/Compliance Reminders

[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). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and 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.**

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Food Employee Reporting Agreements

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

Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products
Shell eggs
Meat (beef, pork, and lamb)
Poultry
Fish

Shellfish and crustaceans
Baked potatoes
Heat-treated plant food, such as cooked rice,
beans, and vegetables
Tofu or other soy protein

Sprouts and seed sprouts
Sliced melons
Cut tomatoes
Cut leafy greens

Untreated garlic-and-oil mixtures
Synthetic ingredients, such as textured soy protein in meat alternatives

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding:** Most recent food safety inspection report is not posted in a publicly visible location.
Corrective Action Needed: Post most recent food safety inspection report in location visible to public. Completed on-site. **No further action required.**

Reporting and Recordkeeping

Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. “LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.
- All free and reduced price applications, including applications from households 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.

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

Comments/Technical Assistance (TA)/Compliance Reminders

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

Breakfast Promotion

The breakfast participation in the Lomira 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>)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Lomira, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

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

Wisconsin School Day Milk Program (WSDMP)
Comments/Technical Assistance (TA)/Compliance Reminders

- 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.
- **Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one.**
- Per the Agreement for the WSDMP in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and perhaps include that stipulation in the SFA’s milk bid.

Findings and Corrective Action: Wisconsin School Day Milk Program

- Finding:** Overt identification is occurring as the tally sheets only have names of free and reduced students.
Corrective Action Required: Please provide a plan as to how counts will be taken without identifying students’ meal eligibility status.
- Finding:** Inaccurate POS as a back out system is used—milks usage is assumed, based on absence. This is a back out system.
Corrective Action Needed: Please provide a plan for counting milks as the student receives one.

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

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

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



With School Nutrition Programs!