

## USDA Child Nutrition Programs Administrative Review Summary Report

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**School Food Authority: Mayville School District**

**Agency Code: 143367**

**School(s) Reviewed: Parkview Elementary**

**Review Date(s): Feb. 20-22, 2018**

**Date of Exit Conference: Feb. 22, 2018**

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

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

### **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state 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 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.USA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USA.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 Mayville for the courtesies extended to us during the on-site review. Thank you to the entire staff for being available and 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 document requests, as well as pulling records for the on-site portion of the review. All were very responsive to our requests, and I would like to thank them for making this review a very positive experience.

The DPI review team appreciates the enthusiasm of the Food Service Director and her staff for their willingness to make necessary changes to meet the school nutrition regulations. They are concerned for the nutritional well-being of their students as was evident through the meal service, menu, food safety, and local wellness. As reviewers, we were very impressed with the bright and colorful meals the students were provided.

A sincere thank-you to the Food Service Director for the excellent program she runs. She is very detailed and was positive, friendly and a pleasure to work with. She definitely is a great asset to the Mayville School District. In addition, a sincere thank-you also to her assistants for their role in helping with the day-to-day program needs. All do a great job in providing the students with wonderful meals and making sure the program is in compliance with the National School Lunch and Breakfast Program Regulations.

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Certification and Benefit Issuance**

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

5 eligibility determinations were reviewed. There were 0 errors identified.

- 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.

#### **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.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- 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](#) one would look at the amount of their income under the column indicating that 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.

#### 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](mailto:karrie.isaacson@dpi.wi.gov) for more information and approval.

#### 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.

#### 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.

#### 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.

#### 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.

#### 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) (<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.

#### 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.

#### 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.

#### 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.
- 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

- DC runs are only for school nutrition and it is not allowable to be running it for other schools outside of your district or for purposes other than school nutrition program.

#### Disclosure

- The information provided by families 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, etc. Consent must be obtained each school year. Find the [Sharing Information](#) with Other Programs template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the Disclosure Agreement form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

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

Technical Assistance was provided regarding the application process, and to be sure to check if the whole application is complete on both sides. ALSO, do not convert the application to yearly income if the frequencies are the same. The only time the annualization should occur is when there is more than one frequency, and they are both at different intervals of the month.

#### **Verification**

#### **Commendations/Comments/Technical Assistance/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**

❑ **Finding #1:** The finding is the adverse action letter the district is using states that the family is given 7 calendar days respond to a change (or decrease) in their eligibility.

**Corrective Action Needed:** 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. Please submit a copy of the corrected letter showing the 10 calendar days in the body of the letter.

## Meal Counting and Claiming

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

- Meals may only be charged to a student at the time of 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.
- 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.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to the food service director at Mayville School District for sending thorough and organized meal pattern documentation prior to the onsite review, as this greatly expedited the onsite review process. The food service professionals are doing a fantastic job of serving healthy, appealing meals to students every day. At Parkview Elementary, students self-serve most items on the meal service line which helps them take ownership of their meals and gives them the option to take what they would like. Kudos to the food service director for championing new ideas and for being willing to change processes to be in compliance with the regulations. Many of the corrective action items listed below were already well on their way to being completed by the time of the onsite review!

### Comments/Technical Assistance/Compliance Reminders

#### **Weight vs. Volume on Production Records**

Fruits and vegetables are credited by volume measures (such as cups), while meat/meat alternates (M/MA) and grains are credited by weight measures (such as ounces). The planned serving sizes written on production records should be consistent with this. For example, the planned serving size of green beans should be  $\frac{1}{2}$  cup rather than 4 oz.

Meat/meat alternate (M/MA) is credited by weight, not by fluid ounces. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving of ground/diced/shredded

#### **Crediting Documentation**

Processed foods that are not listed in the USDA Food Buying Guide for School Meal Programs must be accompanied by product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting. Make sure to secure a PFS directly from the

manufacturer or save a CN label directly off the packaging. If proper documentation cannot be obtained, you should discontinue using the product for school meals. More information about crediting documentation can be found on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

### **Salad Bar on Production Records**

A side salad is listed daily on lunch production records, and a standardized recipe is on file for the side salad. In actuality, the salad is offered self-serve to students on the garden bar. Therefore, the standardized recipe does not accurately reflect what is being served. Each vegetable offered on the garden bar should be listed separately on the production records so that the total planned quantity, actual quantity prepared, and quantity leftover of each vegetable is recorded.

### **Crediting Documentation**

Processed foods that are not listed in the USDA Food Buying Guide for School Meal Programs must be accompanied by product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting. Make sure to secure a PFS directly from the manufacturer or save a CN label directly off the packaging. If proper documentation cannot be obtained, you should discontinue using the product for school meals. More information about crediting documentation can be found on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

### **Crediting Smoothies**

When preparing smoothies in-house, the total volume of pureed fruit or fruit juice included in the smoothie is counted as juice toward the daily and weekly fruit requirements. Smoothies are currently offered at breakfast and are not being credited towards the meal pattern requirements; however, it would be wise to credit the smoothie rather than count it as an extra. The current recipe calls for 108 ounces of strawberries and 20 bananas. These fruits must be pureed and then the total volume of the pureed fruit must be measured in order to determine how much fruit (counting as juice) is in each smoothie. For more information on smoothies, see our [Meal Components](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#multi) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#multi).

### **Non-Whole Grain-Rich Grain**

The garlic bread served during the week of review is not whole grain-rich (WGR). It is being counted as an extra and is not needed to meet the meal pattern requirements, but schools are discouraged from serving non-WGR foods as they still contribute to the calories, saturated fat, and sodium of school meals. It can also be confusing to serve things that do not count as a component or an item under Offer versus Serve (OVS) and can make it more difficult for staff and students to identify a reimbursable meal. Foods that meet the WGR criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched.

### **Training**

Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [training webpage](https://dpi.wi.gov/school-nutrition/training) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](https://dpi.wi.gov/school-nutrition/directory) can be found on our website (dpi.wi.gov/school-nutrition/directory).

## **Findings and Corrective Action Needed**

**❑ Finding:** There was a daily and weekly fruit shortage during the week of review in January 2018, as only ½ cup of fruit was offered every day at breakfast. Per the [breakfast meal pattern requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table.pdf), students of all grades must be offered 1 cup of fruit (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table.pdf).

**Corrective Action Needed:** Please submit one week of completed breakfast production records showing that 1 cup of fruit is offered daily.

*Repeat violations of a daily fruit shortage at breakfast during subsequent Administrative Reviews may result in fiscal action.*

**❑ Finding:** There was a weekly grain shortage and a weekly meat/meat alternate shortage at lunch during the week of review due to a daily alternate entrée option of an Uncrustable, which credits as 1 oz eq M/MA and 1 oz eq grain. Per the [lunch meal pattern requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf), students in grades K-5 must be offered 8 oz eq each of M/MA and grain over the course of a 5-day week (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf).

**Corrective Action Needed:** Please submit a written statement detailing what you will add to the week of review lunch menu to meet the minimum meat/meat alternate and grain requirements.

*Repeat violations of a weekly meat/meat alternate or grain shortage at lunch during subsequent Administrative Reviews may result in fiscal action.*

**❑ Finding:** There was a daily and weekly fruit shortage during the week of review in January 2018, as only ½ cup of fruit was offered every day at breakfast. Per the [breakfast meal pattern requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table.pdf), students of all grades must be offered 1 cup of fruit (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table.pdf).

**Corrective Action Needed:** Please submit one week of completed breakfast production records showing that 1 cup of fruit is offered daily.

*Repeat violations of a daily fruit shortage at breakfast during subsequent Administrative Reviews may result in fiscal action.*

**❑ Finding:** There was a daily grain shortage at breakfast on January 9, 2018. The granola bar, which was the only grain offered, credited as 0.5 oz eq.

**Corrective Action Needed:** Please submit the nutrition facts label and ingredient list for a new product that will be served on this menu day.

*Repeat violations of a daily grain shortage at breakfast during subsequent Administrative Reviews may result in fiscal action.*

**❑ Finding:** The recipe for the three bean salad does not reflect how the recipe is actually being prepared. The yield on the recipe results in a portion of less than ½ cup, while the planned portion size is ½ cup. This recipe is also the only offering of beans/peas/legumes for the review week, so an

updated standardized recipe is needed to evaluate whether the ½ cup requirement for this subgroup was met.

**Corrective Action Needed:** Please submit a standardized recipe for the Three Bean Salad that accurately reflects how the dish is being prepared.

❑ **Finding:** No signage was posted at breakfast. 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.

**Corrective Action Needed:** Please submit a photo of the posted breakfast signage at Parkview Elementary.

### 3. RESOURCE MANAGEMENT

#### Commendations/Comments/Technical Assistance/Compliance Reminder

- 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, was reviewed. We also reviewed how to access the Aids Register, to track all program deposits made to the agency's account. The Aids Register also shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. Both resources are accessible from our [Online Services](http://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

#### Commendations/Comments/Technical Assistance/Compliance Reminder

- Technical Assistance was provided regarding the Annual Financial Report. 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 are located on our 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”.
- 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.

#### 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) guidance (<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.

#### Commendations/Comments/Technical Assistance/Compliance Reminder

Technical Assistance was given regarding collection procedures pertaining to the unpaid meal balance policy that families receive in a written format.

#### Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, 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>).

- Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter
  - Sample robo-call script
  - Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless paid households have chosen to donate those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the [Wisconsin Department of Revenue](#) (DOR) as unclaimed property. The DOR has rules concerning unclaimed property that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).
- 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 are located on our website
  - 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”.
  - 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.

### Paid Lunch Equity

#### Commendations

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Great job running this tool! The current weighted average for 2017-18 SY tool is \$2.86.
- 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.

### Revenue from Nonprogram Foods

Non-Program tool was completed. Great job on running the tool!

- 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>).

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

- 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 you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).

- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.
- Resources
- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (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) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf)

❑ **Finding #1:** On the annual Financial Report, the Labor and Food Expenditures need to be broken out individually under Labor Expenditure and Food Expenditure. Currently it is listed as \$0.00. and all listed in National School Lunch Program.

**Corrective Action Needed:** Submit a statement stating that for the future Annual Financial Reports, the Labor and Food Expenditures will be broken out separately for the National School Lunch program, and also the School Breakfast program.

### Indirect Costs

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

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
  - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
  - Utility charges - separately metered or current usage study by the local utility company.
  - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
  - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
  - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

- Civil rights training had been attended by all staff in the schools and documentation was available for review.

- 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 Self-Compliance Form

- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually.

#### 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.

**❑ Finding:** The incorrect Non-Discrimination Statement was found on several items within the offsite documents that were requested. They include: the public release, the adverse action letters to parents, the eligibility letters to parents, unpaid meal policy, They were outdated, and not complete and not current.

**Corrective Action Needed:** Use the most current Non Discrimination Statement in all of the district's documents within the Food Service Program. . It was brought to the SFA's attention, and she was able to provide copies of the noted above items showing the corrected Non-Discrimination Statement on them. Corrected on site. No further action needed.

#### Safety Inspection Reports

**❑ Finding:** The safety inspection report that was posted was not in a place where public can view, and also was not the current report.

**Corrective Action Required:** Post the most current Food Safety Report in the cafeteria where the public can view at any time. This was corrected on site. No further action needed.

#### Special Dietary Needs

Mayville School District did not have any special dietary needs students at the time of the review.

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the prototype [Medical Statement for Special Dietary Needs](#) posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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>).

- School food service staff may make food substitutions, at their discretion, for children for whom they do not have 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. Accommodations made for students without a signed medical statement from a licensed medical practitioner 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.

### Overt Identification

The meal counting system must prevent overt identification of students receiving free and reduced price benefits.

**❑ Finding:** The computer screens utilized at the point of sale at lunch at Parkview Elementary School display student meal prices for each price point (\$0.00, \$0.40, \$2.45) which constitutes overt identification.

**Corrective Action Needed:** Make adjustments to the point of sale display so that overt identification is prevented. If cashiers do not need to know which students are free, reduced or paid, student reimbursable meal prices should be removed from the point of sale display by changing the settings in the software system. If cashiers must know a students' eligibility status, the screens should be positioned in a manner that prevents students from viewing the screen. Alternatively, screen protectors that conceal the display from easy viewing may be purchased and implemented. Please submit a photo showing how the overt identification has been corrected.

### On-site Monitoring

#### Commendations

On-Site Monitoring is being done on an on-going basis, multiple times per year here at Mayville. The SFA is very "hands on" and involved in every way.

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.
- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see [USDA memo SP 56-2016](http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf) (<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>).
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

### Local Wellness Policy

## Commendations

The district's Wellness Policy has all the requirements needed.

## Technical Assistance

Technical Assistance was provided regarding the Triennial Assessment, and a reminder to retain all documentation; meeting minutes.

Triennial Assessment – LWPs must include language regarding the completion of a triennial assessment. The district will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school is in compliance with the policy and how the policy compares to a model policy, as established by the U.S. Department of Agriculture.

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

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). This can be accessed electronically (<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).

SFA is required to have a committee of diverse stakeholders and/or a roster of those involved (1003)

### **Technical Assistance**

The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. SFA wellness committees should include a diverse team of committed school and community stakeholders. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.

SFA is required to inform potential stakeholders of their ability to participate in the Local Wellness Policy (1004)

### **Technical Assistance**

The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of 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>).

SFA is required to complete an assessment of the Local Wellness Policy (1005)

### **Technical Assistance**

The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to assess the local school wellness policy (LW every three years.

- SFA required to inform the public of the results of the most recent assessment (1006)
- Technical Assistance for 1006, if do not have a policy: The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to inform and update the public about the assessment of the implementation of LWP.

The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. Following the assessment SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. It is recommended SFAs include a plan to improve upon the results of the assessment.

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) ([http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](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>).

## **SMART SNACKS**

### **Comments/Technical Assistance/Compliance Reminders**

At the time of the onsite review there were no competitive foods or beverages sold at Parkview Elementary School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](#) webpage ([dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks)).

## **Professional Standards**

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

SFA is documenting all Professional Standards training for herself and staff. Mayville School District Food Service Staff is up to date with their training.

Technical Assistance was given to possibly use the DPI template for tracking Professional Standards Training.

- 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](#) 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>).

- 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: 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.

### **Water**

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

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Water is readily available just outside the cafeteria and students are able to freely use the water fountain as needed.

### **Food Safety and Buy American**

#### **Commendations/Comments/Technical Assistance/Compliance Reminder**

- 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.
- 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

Technical Assistance was given regarding the food safety plans at each site. Keep them current and any changes made should be site specific.

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](http://www.fns.usda.gov/ofs/food-safety-flashes)). While you're at it, visit the Office of Food Safety website ([www.fns.usda.gov/ofs/food-safety](http://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!

- 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 food service staff. 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>).
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- 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 handlers must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- All food handlers 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 goods areas.

## 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.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above ( “non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement, including a tool to assist with tracking 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>).

## Reporting and Recordkeeping

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

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

### Findings and Corrective Action Needed: SFSP and SBP Outreach

Technical Assistance was provided regarding Summer Meals. Information, links, and contact information was given.

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 Mayville School District, USDA would like 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 on the [DPI Summer Meals](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) 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>)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all [potential participating sites in your area](#), see the interactive map 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

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>).