

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

School Food Authority: Randolph School District

Agency Code: 14-4634

School(s) Reviewed: Randolph Elementary School

Review Date(s): 4/10/18-4/12/18

Date of Exit Conference: 4/12/18

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

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

General Program Reminders/Updates:

GOALS

- 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).

SOCIAL MEDIA

- Submit photos to the School Nutrition Team to be posted on the DPI SNT Facebook page, Twitter page or Instagram page. Send photos to Dana Colla at dana.colla@dpi.wi.gov.

SNSDC TRAININGS

- The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer in Green Bay, Wausau, Rice Lake, Madison and Milwaukee. There will be emails sent in the coming months regarding the trainings available at these locations. You may also check back on the [School Nutrition Team training website](https://dpi.wi.gov/school-nutrition/training) (<https://dpi.wi.gov/school-nutrition/training>).

Appreciation/Commendations:

Thank you to the Business Director, Food Service Director, Food Service Staff, Secretaries and District Staff for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. 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.

Thank you for all that you do to feed the students healthy meals!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Applications were determined in a timely manner. The official's organization of the requested benefits information made it easy to review.
- Direct Certification is run early and often which is a best practice. Great work!
- Benefit Issuance list is updated as needed, and includes all necessary information.
- 160 eligibility determinations were reviewed; 0 errors were identified.

Technical Assistance/Compliance Reminders

- All applications must be signed by the Determining Official and dated when the application was determined. This signifies the start date of eligibility and that the application was determined.
- All applications selected for Verification must be reviewed by the Confirming Official and signed off on prior to sending out the "We must check" letter to the household(s).
- All applications selected for Verification must be signed off on by the Verifying Official once Verification is complete.

Disclosure

- For any staff that has access to students' eligibility status that isn't within the School Nutrition Office (i.e. IT Department, Principals, Secretaries) they must sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This is to protect the students from any overt identification. 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>).
- These staff members that have access to student eligibility statuses need to have Civil Rights training annually as well.

Transferring Students

- If a student had a free or reduced price meal eligibility at his/her prior school district, the school can provide a copy to the district the student is transferring in to.
- The start date of eligibility is the date the Determining Official reviews and determines the application, signing and dating it.

Verification

Comments/Technical Assistance/Compliance Reminders

- Verification began the first week of October, as the sample size determined 1 application had to be verified.
- The household selected for Verification did not respond. As a result, adverse action was applied. The status should be changed in the system 10 days from the date the "We Have Checked" letter was mailed out.
- DPI template letters and the tracking form were used.
- Verification process was completed prior to the November 15 deadline.

Meal Counting and Claiming

Commendations

The Breakfast and Lunch claims for March were done correctly with no errors.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director and the staff for all they do to feed the children of the Randolph School District, the meals provided are healthy, great tasting, and well designed for health and variety. Your time and effort spent preparing for and participating in the onsite review is much appreciated. All school staff were welcoming and professional. The food service staff had pleasant interactions with students during observed meal services. Kitchens and service areas were very clean as well. The Food Service Director was available to answer questions, nice to work with, and receptive to feedback. The Food Service Director has a clear grasp on all the concepts needed to run a great NSLP and SBP, The FSD is a real asset to your district.

Comments/Technical Assistance/Compliance Reminders

Training

It is recommended that anyone involved with the School Meals Program attend DPI training classes. The classes are offered in the summer and select other times throughout the year. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the NSLP and SBP requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics including:

- [USDA food recipes](https://www.youtube.com/watch?v=8tp4WCWcryg&list=UUNnBe12n6q4QT39Fz2y7BPg) (https://www.youtube.com/watch?v=8tp4WCWcryg&list=UUNnBe12n6q4QT39Fz2y7BPg)
- [Offer Versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#cyc) (https://dpi.wi.gov/school-nutrition/training/webcasts#cyc)

These can be found on DPI's [Webcast Page](https://dpi.wi.gov/schoolnutrition/training/webcasts) (https://dpi.wi.gov/schoolnutrition/training/webcasts)

The U.S. Department of Agriculture encourages schools to utilize [Smarter Lunchroom](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp_ch6.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp_ch6.pdf) techniques to encourage students to make healthy food choices. Smarter Lunchrooms use research-based principles that lead children to make healthy choices but still offer a full spectrum of choice. All Smarter Lunchroom techniques are low- or no-cost, sustainable, and focus on improving the lunchroom environment to promote healthful eating behaviors. [Smarter Lunchrooms Strategies](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies)

School Breakfast Program

The Food Research & Action Center (FRAC) School Breakfast Report Card for the 2016-17 school year ranks Wisconsin 36th for the percentage of free and reduced price meal eligible students participating in breakfast of those participating in lunch (Wisconsin ranked 35th in the 2015-16 school year).

The School Breakfast Program is a great way to start a successful day. Food Research & Action Center (FRAC) is a good resource for school looking for information and research on a variety of topics related to nutrition and children. The following is a link to research related to the [Benefits of School Breakfast](http://www.frac.org/programs/school-breakfast-program/benefits-school-breakfast) (<http://www.frac.org/programs/school-breakfast-program/benefits-school-breakfast>) and [Breakfast for Learning](http://frac.org/research/resource-library/breakfast-for-learning) (<http://frac.org/research/resource-library/breakfast-for-learning>).

This visual [Breakfast in the Classroom](http://frac.org/wp-content/uploads/BIC.jpg) (<http://frac.org/wp-content/uploads/BIC.jpg>) infographic lists the benefits of breakfast in the classroom, even though the benefits listed have been shown to influence students no matter where schools offer breakfast,

The benefits include:

- Increased standardized test scores, cognitive functions, and participation
- Decreased tardiness, behavioral issues, absenteeism and stigma.

The DPI website has provided tools for school to utilize in creating and promoting their [School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>). The following are handouts that have been well received by students, faculty, and administration.

- [Mid-morning Nutrition Break](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_mmnbn.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_mmnbn.pdf)
- [Grab n' Go Breakfast](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_gng.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_gng.pdf)

Technical Assistance was given on-site to move the entrée and the fruit/vegetable in the breakfast service line so that the fruit or vegetable items are offered before the entrée for proper monitoring of amounts taken by students. To ensure a reimbursable meal is taken.

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. One of the intents is that someone else (e.g. a substitute food service worker) could produce the planned menu. Be specific on production records about the identity, brand, and description of the items served. Garden bar items should be listed by name including planned amount to be offered. When offering fresh fruit case size should also be recorded. It is helpful to include not just the portion size, but also crediting on production records. Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Find information on [production records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) “must have/nice to have” here (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). The DPI offers 1, 2, and 3 grade group [lunch](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-lunch-three-grade-groups.doc) production records (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-lunch-three-grade-groups.doc>) and a K-12 [breakfast](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-breakfast-one-grade-group.doc) record here as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-breakfast-one-grade-group.doc>).

Technical Assistance was given on-site regarding the creation of specialized production records, possibly utilizing the talents computer class students.

Signage

Signage helps students understand what components/items make up a reimbursable meal, and your signage is very impressive! 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 lunch signage should list the five components and inform students that under Offer versus Serve (OVS), students must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination of fruit and vegetable.

The vegetables on the garden bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. Many schools are using pictures of planned portion sizes to indicate how many of each item need to be taken to meet meal pattern requirements. Examples could include how many carrot sticks equal a ¼ cup or how many tongs of salad greens are needed to equal ½ cup. Posting pictures indicating what a planned portion size in would be beneficial. The Lunchroom is a classroom and you have the ability to instill lifelong knowledge to your students about the benefits of healthy eating.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding:** None found

Corrective Action Needed: None Needed

3. RESOURCE MANAGEMENT

Commendations

PLE Tool

- SFA is running the PLE tool correctly and adhering to the required lunch price increases every year by exceeding the necessary 10 cent weighted average increase.
- USDA has not yet released the PLE tool for the 2018-19 SY. Once it is released, you will get an email through the SNT listserv.

Technical Assistance/Compliance Reminders

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) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).
- The SFA currently has a written unpaid meal charge policy in place that is not being enforced. Technical assistance was provided on-site regarding other Unpaid Meal Charge Policies at other districts as well as implementing alternate meals for negative account balances.
- Once established, the Unpaid Meal Charge Policy must be clearly communicated to all households/staff and upheld in order to prevent a deficit to Fund 50.

Allowable Costs

- 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, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) may be found on the Financial Management webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>). A best practice is to continue to collect on the unpaid meal charges as long as you are able to and the student is still enrolled. If unable to collect, then a transfer is required to Fund 50 from Fund 10 or another non-federal fund.
- Per question 15 of the [Financial Q&A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf), student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>). Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50.

Refunds of Student Meal Accounts

- 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>).

Revenue from Nonprogram Foods

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at the school district include: Adult Meals, Extra Entrees, Extra Milk, A la Carte, and Catering.
- Catering invoices must include labor. Labor for catering cannot be paid out by Fund 50.
- The raw food cost of all nonprogram foods must be marked up to cover all labor, food, equipment, purchased services, and other expenditures. A [list of possible expenditures](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc) can be found on the DPI Financial Website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc>)
- The USDA Nonprogram Revenue Tool (calculation shown below) must be completed annually, at a minimum to determine whether the USDA nonprogram food regulation is being met or not.
- It’s important to know whether you are covering your costs for all nonprogram foods and make sure you are not using federal reimbursement to subsidize any nonprogram foods or beverages.
- The data to use for this calculation should be from the entire school year. The best time to do this calculation is once you have submitted the Annual Financial Report for the year.

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

- The [Menu Raw Food Costing Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw-food-costing-tool.xls) should be used to cost out the reimbursable meals and extra entrees (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw-food-costing-tool.xls>). Once the average cost of an entrée and reimbursable meal is calculated, you can enter this data into the [DPI Nonprogram Food Price Calculator Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) which will determine how much you should charge for an extra entrée as well as calculate the USDA Non Program Food Revenue formula for you (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

Findings and Corrective Action

❑ **Finding #1:** The 16-17 SY Annual Financial Report is incomplete. Expenditures are not being allocated to the correct programs or expenditure categories.

Corrective Action Required: Update the 16-17 Annual Financial Report so that the correct amounts of labor, food, equipment, purchased services and other expenditures are allocated for each program and the nonprogram foods categories. Update the rest of the expenditure categories as necessary. Submit an email to Jacqueline Jordee at jacqueline.jordee@dpi.wi.gov with the updated information, copy the consultant on the email. **Corrected on-site. No further action required.**

❑ **Finding #2:** Nonprogram food expenses and revenues are not being monitored by the SFA to know if they are in compliance with the Nonprogram Foods Regulation.

Corrective Action Required: Complete the [DPI Nonprogram Food Price Calculator Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xls) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xls>). Use the [Menu Raw Food Costing Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw-food-costing-tool.xls) to assess extra entrée and a la carte costs and prices (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw-food-costing-tool.xls>). **Submit a copy of the completed DPI Nonprogram Food Price Calculator tool to the consultant along with a copy of the new a la carte prices and when you plan to implement them.**

❑ **Finding #3:** Labor for catering is not being billed to the organizations requesting caterings.

Corrective Action Required: Submit a statement as to how you will be billing future catering events to cover all costs.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed for all food service staff involved with the School Nutrition Programs. The PI 1441 form was completed correctly and prior to the October 31 deadline.

Technical Assistance/Compliance Reminders

Civil Rights Training

- Annually, civil rights training must be completed for all staff involved in the school nutrition programs. This includes non-nutrition staff members that may handle the administrative side of the programs.

Findings and Corrective Action Needed

❑ **Finding #1:** The shortened USDA Non-discrimination statement on the printed menus and menus posted on the school website is incorrect. It should say, "This institution is an equal opportunity provider."

Corrective Action: Update the April menus (breakfast and lunch), including the menus posted to the school website, to have the correct shortened USDA Non-discrimination statement. **Submit a copy of the updated April menus and a link to the updated online menu.**

❑ **Finding #2:** The price for a breakfast and a lunch shows on the computer screen indicating whether the student is free, reduced, or paid eligible.

Corrective Action Needed: Reconfigure the point of sale software to not show the price of a lunch or breakfast so no overt identification is occurring. **Submit a statement via email that this has been completed. Completed on-site, no further action required.**

Local Wellness Policy

Commendations

The SFA has a Wellness Policy in place. Thank you for having a wellness policy on file and working to assure students are on the path for a healthy lifestyle.

Technical Assistance: Local 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. 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 complete an assessment of the LWP:

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

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

SFA required to inform the public of the results of the most recent assessment:

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 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. 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. It is recommended SFAs include an improvement plan upon the results of the assessment.

DPI's Team Nutrition has developed a toolkit and other resources to assist schools with building their [wellness policy](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). Schools can choose from several standardized language options in the toolkit that comply with USDA's regulations and tailor it to their school needs.

❑ Finding #1: The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>).

Provide a timeline of when you plan to have the policy updated and compliant with the final rule. The [Wellness Policy Builder](#) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy (<https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1>). **Completed on-site. No further action required.**

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

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. You can find more information on our [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie (≤ 5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (< 5 kcal/8 fluid oz; ≤ 10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable.

We recommend using the Alliance for a Healthier Generation Smart Snacks Product Calculator, found on the Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) 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.

Weekly, unhealthy food fundraisers undermine the progress made by the Food Service Director to provide healthy, balanced meals to students. Whenever possible, the district is strongly encouraged to help student organizations find ways to hold fundraisers that promote a healthy lifestyle. More information on the Smart Snack standards can be found on [DPI's Smart Snacks webpage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).

Another useful resource for school is the [USDA Guide](https://fns-prod.azureedge.net/sites/default/files/tn/USDASmartSnacks.pdf) to Smart Snacks in school. (<https://fns-prod.azureedge.net/sites/default/files/tn/USDASmartSnacks.pdf>)

Professional Standards

Comments/Commendations

The Business Manager and Food Service Director share the majority of the program duties. The Food Service Director is doing a good job making sure staff are getting their required training hours throughout the school year, that pertain to their job duties. The Food Service Director attends SNSDC classes and other trainings to stay up to date on the regulations. Nice work!

Technical Assistance

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.

Findings and Corrective Action

❑ **Finding #1:** Trainings are not being tracked for all staff members involved with the School Nutrition Programs. However, the training logs that are being kept are missing some information. Training logs should have the employees' date of hire, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff).

Corrective Action Needed: Update the tracking tools to include this information. You may use the DPI Tracking Tool or create your own to include all information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>). **Submit a copy of the updated tracking tools.**

Food Safety and Storage

Commendations

- It was evident during meal observation that staff members are well-trained on food safety procedures and effectively implement the food safety plan.
- A site-specific food safety plan was available at the reviewed school. It was clear that the plans are reviewed and updated regularly.
- Temperature records were well-kept, detailed, and available at the reviewed site.
- The food safety plan contained all required documentation including the equipment list, a list of the process 1, 2, and 3 foods, and site specific standard operating procedures.

Findings and Corrective Action

❑ **Finding #1:** Standard operating procedure (SOP) regarding TCS foods is not included in the food safety plan. SOPs are required for all applicable programs and processes occurring at the site.

Corrective Action Needed: Create or adapt a SOP to reflect *site-specific* procedures—particularly referring to TCS Foods. **Submit a copy of the TCS Foods SOP you have adopted.**

Buy American

Technical Assistance

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.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy

American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin identified on label, than 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.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If 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.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america>).

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>).

❑ 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 mandarin oranges from China
- Sliced Black Olives from Spain
- Bountiful Harvest's Pineapple Chunks from Thailand
- Cucumbers from Canada
- Trio gravy from Canada

Label does not identify country of origin:

In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the TA notes above for sample certification language. Many products in the dry storage and refrigerator were not labeled with a country of origin, substituting this information for “manufactured by” or “distributed by”. This made identifying compliance and noncompliance with the Buy American Provision challenging. As part of Fond du Lac School District’s Procurement Review, SNT will check that the procurement manual includes language pertaining to Buy American. An additional attestation from food service’s distributors and/or vendors may be required. Further information is available on the USDA Foods [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>). This will be treated as TA for the 2017-18 school year, but work with your distributors and/or vendors to move toward compliance.

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All documents pertaining to the School Nutrition Programs 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. In other words, keep all documents for 3 years plus the current school year.

School Breakfast Program (SBP) Outreach

Comments/Technical Assistance

- At the beginning of the school year, the SFA notifies families of the availability of breakfast through the public release and posting the breakfast menu on the school website.
- There was some discussion regarding concerns for poor breakfast participation even though the district has eliminated the Reduced-price category. More breakfast program outreach could see an increase in breakfast participation. Adding information to the monthly school newsletter regarding the School Breakfast Program will help remind parents that breakfast is available for their students.
- Alternative breakfast service models can be great options for increasing participation.
- *Breakfast after First Period*- Breakfast after first period or second chance breakfast is a great way to increase breakfast participation, especially at the high school level. It gives students who weren’t hungry first thing in the morning a second chance at breakfast. It works well when combined with a grab n’ go concept and offered on mobile carts or tables in high traffic areas. Students are able to grab a reimbursable breakfast on their way to class. It is also sometimes offered in the cafeteria between classes depending on what works best for the school.

Summer Food Service Program (SFSP) Outreach

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round.

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](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)

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](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).

Feel free to contact Amy Kolano with any questions regarding the Summer Food Service Program. Her phone number is (608) 266-7124. Her email address is amy.kolano@dpi.wi.gov.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program

Commendations.

- The claim for the 2016-17 school year was correctly consolidated and claimed for.

Findings and Corrective Action

□ Finding #1: Milk counts are not being taken at the point of sale.

Corrective Action: Submit a statement of how teachers will take milk counts and when you plan to implement this new system.

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



With School Nutrition Programs!