

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Menomonie School District

Agency Code: 17-3444

School(s) Reviewed: Oaklawn Elementary, Menomonie Middle School

Review Date(s): 12/12/17–12/13/17

Date of Exit Conference: 12/21/17

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 a minimal cost. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Appreciation/Commendations/Noteworthy Initiatives:

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

The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, and local wellness. We were impressed during meal service at Menomonie Middle School that appealing sample trays featuring the daily menu are displayed for students daily. Additionally, the Adventurous Eaters program offered at various schools is a noteworthy initiative that encourages students to sample new menu items or other healthy menu options.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

Of the 420 eligibility determinations reviewed, 2 errors were identified.

Free and Reduced Price Meal Applications

- All applications were reviewed in a timely manner, with benefit status implemented within 10 operating days of the receipt of the application.
- All reviewed denied applications were correctly denied. Families were notified of denial of benefits appropriately.
- The procedures used to receive and approve applications appear to be efficient, accurate, and convenient for parents.
 - Parents may submit paper applications. Paper applications are date stamped when they are received. The Determining Official dates the application after it is manually approved/denied, and then enters all of the provided information into Skyward—including the determined benefit status. Skyward is not used to complete the benefit determination.
 - Parents may submit electronic applications through the parent portal. Electronic applications are electronically dated when they are submitted. The Determining Official prints copies of electronic applications, manually completes benefit determination, notes the determination date, and enters the appropriate benefit status into the students' Skyward account. Skyward is not used to complete the benefit determination.
- Thank you to the Determining Official for providing all requested information in a timely, organized fashion. It was clear that the Determining Official is very knowledgeable on the free/reduced price meal application approval process.

Incomplete Applications

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

Application Forms

- Thank you for using the DPI prototype letters or the equivalent letters generated by Skyward for approved/denied benefits, as well as direct certification benefit notification. The current non-discrimination statement was provided on all letters sent to families regarding meal benefits.

Other Source Categorical

- The only applications reviewed that were classified as other source categorical were based on FoodShare case numbers. As a reminder, SFA's may verify for cause any application that provides a

FoodShare case number and contains students' names that do not show up on Direct Certification runs as receiving FoodShare benefits. Please reference page 34 of the Eligibility Manual for more information regarding this scenario.

Effective Date of Eligibility

- The date stamping system used to indicate when applications are received and the date of approval appears efficient, accurate, and consistent.

Public Release

- Thank you for distributing the public release information to one local media outlet and two grassroots organizations within the appropriate timeframe.

Limited English Proficiency (LEP)

- 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 SFA does a great job of ensuring that every household has access to meal applications in the language of preference. In addition they employ interpreters for any household requesting additional assistance in completing an application for meal benefits.
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Direct Certification

- 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.
- Benefits were appropriately extended to students that share a household with students that were directly certified, with one error that is noted in the corrective action section below.

Disclosure

- The SFA uses the DPI disclosure agreement template. To ensure all students receiving free or reduced price meal benefits have the opportunity to grant consent of sharing of meal benefit status, the disclosure form is mailed to all qualified families along with their benefit approval or direct certification approval letter.

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ Finding: One student was receiving free benefits based on the extension of a Direct Certification E code within the household. Students that match on Direct Certification as an E code are foster children and cannot extend eligibility status to other students in the household.

Corrective Action Needed: Notify the household, whose benefits will be decreased from free to paid status, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the student's eligibility in the system, 10 calendar days from the date the notification letter was sent out. A letter was sent out on 12/13/17. No further action required.

❑ Finding: One student was receiving reduced benefits without proper documentation of eligibility based on an approved application or direct certification. The student lives with a payor who submitted a complete, approved application for reduced price meal benefits for other students in the household. However, the name of the student in question was not listed on the application. The student was listed

on the approval of benefits letter sent to the family. If the student is a household member, even on a part time basis, he may be included as such on the application and receive the same benefits as other students in the household. If he is not a member of the household and does not live with them at anytime during the year, he would not be eligible for meal benefits regardless of whom is listed as his payor in the software system.

Corrective Action Needed: Contact the family to determine if this student is a household member. If so document this on the application with signature and date this was verified by the SFA and continue the benefit for the student. If the student is not a household member notify the household that benefits will be decreased from reduced to paid status for this student, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the student's eligibility in the system, 10 calendar days from the date the notification letter was sent to the household. Include a statement indication the steps taken to correct the error and the steps taken to ensure similar errors do not occur in the future.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- It was apparent when reviewing verification materials that the Verifying Official is very knowledgeable on the verification process. The responsibilities of the Determining, Verifying, and Confirming Officials were clearly understood, which each official fulfilling the responsibilities designated to them.
- The Verifying Official voluntarily selected the standard sample method for verification and used Skyward to randomly select the error prone applications to verify. The required time frames for each step in the verification process were followed and appropriately documented using the verification tracking tool.
- When verification outcomes resulted in a decrease in benefits, the required adverse action letter was sent to families in the designated timeframe.
- The submitted verification collection report appeared to accurately reflect the verification process completed.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- The end of the line point of service meal counting and claiming procedures observed on-site during breakfast and lunch at the review sites assures proper benefit issuance.
- The edit check review completed by the Food Service Director using Skyward Accuclaim reports before submitting the monthly claim ensures that any counting/claiming errors are corrected before submitting the monthly claim for reimbursement.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning). Thank you to the SFA for offering students field trip meals when needed.
- On the day of review at Menomonie Middle School, there were visiting students eating school lunch. The use of a visitor Skyward account and the procedures for counting, claiming, and collecting payment from visiting students was effective and acceptable. 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. To claim students the SFA may keep a manual checklist of the number of meals and add them to the monthly claim for that school under the paid category. The SFA must maintain the documentation with notes about the event that prompted the added students. If the

SFA would like to claim occasional meals to visiting students a Visitor PIN number could be used at the POS. The SFA should have a procedure in place to outline their

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

- Thank you to the staff at Oaklawn Elementary and Menomonie Middle School for the warm welcome during our on-site visit. Everyone was extremely friendly and helpful during our visit. In addition, it was wonderful to hear about the great things the school district is doing with Farm to School initiatives (procuring local beef, Harvest of the Month, Adventurous Eaters etc.) and to see the colorful and well-stocked salad bars at both the Elementary and Middle School. Keep up the great work!

Comments/Technical Assistance/Compliance Reminders

Crediting Documentation

- The staff do an excellent job at saving crediting documentation for the foods served in the meal programs. As a reminder, collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. Additional information about crediting documentation can be found on the [Meal Pattern Components](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>).

Production Records

- Production records serve as a way to demonstrate that the foods offered on the menu meet meal pattern requirements. They also aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Middle School breakfast production records for the week of review were missing a few pieces of information including: portion sizes, planned number of servings, number of meals planned, total number of purchase units and number of meals served. Middle School lunch production records were missing number of meals planned. Technical assistance was provided to include the aforementioned items.
- Remember to be specific on production records about the identity, brand, and description of the items served. It was noted that on two of the Elementary School lunch production records (Monday and Wednesday) only “fresh veggie” was written in. This does not indicate what was served to students. It is important to write in exactly what vegetable was offered that day so that staff know what to prepare, or if a substitution were to be made, they would know from which vegetable subgroup to pull for substitution.
- Additionally, remember to include the type and count size of fruit served each day. The specific type(s) of fruit offered, along with planned portion size(s), must be included to document this component was planned and served. Count size is important to determine if crediting is accurate.
- For your reference, a list of production record requirements (“Must Haves and Nice to Haves”) and sample production record templates can be found on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Crediting on Production Records

- Excellent job of providing crediting documentation on production records. However, care must be taken when providing the crediting for generic menu items (e.g., fresh fruit) as the crediting, after writing in the specific food item for the day of service, can frequently be incorrect. For example, the Middle School garden bar production record for Monday 11/6/17 had *fresh fruit* prepopulated in

the template, however, *cucumbers* was written in for what was actually served that day. The crediting was listed as 0.50 fruit, which would be incorrect. We encourage you to leave the crediting blank for these menu items so that actual crediting can be added the day of service.

- In addition, a few menu items were incorrectly credited on the production record. The BBQ pork served on 11/9/17 actually credits as 1.5 oz. eq M/MA not 3 oz. eq M/MA as listed on the production record. The hoagie bun for the Philly cheesesteak sandwich served on 11/7/17 is 3 oz. eq grain not 2.75 oz. eq grain, and lastly the Cuban sandwich served on 11/8/17 credits as 2.5 oz. eq M/MA not 2 oz. eq M/MA.

Standardized Recipes

- A few recipes used during the review week were lacking pieces of information necessary for standardized recipes. Just like production records, the completeness of standardized recipe is important to be able to accurately determine if meal pattern is being met. Technical assistance was given on-site to include all food items that are included in the recipe (the dinner roll in the BLT salad), the total weight and/or volume of each ingredient as listed under the amount column (veggie entree salad), in addition to having consistent naming (chicken fajita entree salad).
- Please review and update the following recipes:
 - Veggie entrée salad. Make sure that the weight or measure of each ingredient is filled in. This will assist staff in gathering the correct amounts of food items to be able to accurately prepare the number of salads needed.
 - Chicken fajita entree salad. Production records say chicken fajita salad but the standardized recipe is for southwest salad. It is recommended that the naming be consistent. Please choose the name that staff use and make consistent across all recipes and production records.
 - BLT entrée salad. For the week of review, both the recipe provided for this salad and the accompanying production records did not list a grain. However, while on-site, the recipe book in the kitchen that the cooks refer to did in fact list a grain item (2 oz. eq dinner roll). Please remember that documentation of what foods are offered is critical to determining if meal pattern was met. Technical assistance was given, and the electronic copy of the recipe was immediately updated to include the dinner roll.
- For additional information, visit our [Recipe Resources and Tools](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Signage

- Breakfast signage at the Middle School included the cheese stick under the Milk heading, which gave the impression that students had to take either the cheese stick or the milk. However, Offer vs. Serve was still being implemented correctly, and students were able to choose both the cheese stick and milk if they wanted. Technical assistance was provided to move the cheese stick to the Grains heading, which is more appropriate for meal pattern terminology.
- Lunch signage at the Middle School was impressive. We loved seeing the large, colorful poster board. However, the poster board needs to include a statement about the requirement for students to select at least a 1/2 cup fruit or vegetable. Reviewers were pleased to see supplemental signage on the line that showed how much of specific fruits and vegetables students must take to make up a 1/2 cup and students were appropriately sent back to the line if they didn't have enough fruit and/or vegetable on their tray. Nonetheless, the poster board itself must include this information. Please modify the current statement (written along the bottom of the board) to say, "Build a complete meal by selecting foods from at least 3 groups, including a 1/2 cup of fruit, vegetable, or a fruit/vegetable combination."

- For additional signage resources visit our [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- No findings.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

- The Annual Financial Report (AFR) is a snapshot of the school nutrition financial status during any given school year. The report should reflect revenues and expenditures by program and provide an accurate financial accountability of the program. The ending fund balance on June 30 of any given year must be the beginning fund balance on July 1 for the new school year.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ Finding: The Beginning fund balance on July 1, 2017 reported on the AFR for school year 2016-17 did not match the ending fund balance on June 30, 2017. The original error appeared to be an issue with the district audit and where the auditor requested the adjustment. This was corrected prior to the onsite visit by way of an amended financial report. The amended report shows a difference of \$35.26 between the beginning and ending fund balance in what appears to be the result of an unresolved reporting error in a previous year.

Corrective Action Needed: The error was corrected onsite. A statement indicating compliance in future years in in the file. No further corrective action is required.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Nondiscrimination Statement

- The SFA used the correct non-discrimination statement on all program materials.

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered. The poster was in an appropriate location at Oaklawn Elementary, however the poster was not in a location readable for the students at the middle school. See corrective action below.

Civil Rights Training

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

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually. The SFA completed the form correctly and within the required timeframe.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- At the Menomonie School District, signed medical statements indicating special dietary needs are submitted to the school nurse. The school nurse retains a copy of the statements and provides copies of the statement to the Food Service Director and the Food Service Manager at the school the child attends. The special dietary need is entered into the child's Skyward account and appears in red font as a warning to assist staff in managing the student's dietary needs.

Overt Identification

- The Food Service Director had a proficient understanding of the necessity of preventing overt identification, and described safeguards in place to prevent it. During lunch service at Oaklawn Elementary and breakfast service at Menomonie Middle School, over identification was prevented. However during lunch service at Menomonie Middle, it was noted that meal prices for student meals (i.e., \$2.90, \$0.40, \$0.00) were visible on the computer screen that can be seen by students, which constitutes overt identification. The prices were visible on the line labeled "current purchases." See corrective action below.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. The SFA had a procedure in place but it was not in writing. This was corrected during the onsite review and posted on the school nutrition website. No further corrective action is required.

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding:** The "And Justice for All" poster was not posted in a publicly visible, readable location at Menomonie Middle School.

Corrective Action Needed: The poster was promptly relocate the poster to a location that is readable and accessible to students. Corrected on-site, no further action required.

❑ **Finding:** During lunch service, Menomonie Middle had individual lunch prices by price category visible on the computer screen at the point of service which constitutes overt identification.

Corrective Action Needed: The point of service settings on the computers were promptly edited to hide the meal prices and thus prevent overt identification. Corrected on-site, no further action required.

On-site Monitoring

- 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; this is due by February 1. The on-site monitoring forms for lunch at Menomonie Middle and Oaklawn were reviewed, as well as the breakfast on-site monitoring for the middle school. The Food Service Director plans to conduct on-site monitoring of 100% of SBP sites, and will be completing on-site monitoring of the SBP at Oaklawn Elementary in the next several months.
- One of the three reviewed on-site monitoring forms was not completed on the most updated version of the form. Technical assistance was provided. 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](#) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

- The Local Wellness Policy for the SFA contained all of the required elements. The policy contained specific goals for a variety of wellness topics. While observing meal service in several schools, it was evident that the wellness policy was being implemented.
- The established wellness committee meets annually to review and update the policy. The policy was last updated 1/23/17.
- Review of the Wellness Policy page of the SFA's website indicates that the public is invited to contribute to the policy, that the written policy is available to the public, and that the public is notified of updates/assessments of the policy.

Resources:

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

Smart Snacks

Commendations

- Thank you for providing us with Smart Snacks documentation in an organized manner. It was great to see that Menomonie Middle School is offering a wide variety of Smart Snacks compliant products to the student population. In addition, we commend the way you offer Smart Snacks after meal service so it does not detract from students selecting a reimbursable meal.

Comments/Technical Assistance/Compliance Reminders

Smart Snacks

- We were pleased to see that the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) was used to determine compliance with nutrition guidelines for Smart Snacks (<https://foodplanner.healthiergeneration.org/calculator/>). Please remember to keep the nutrition facts labels on file along with the calculator print out. This will assist with determining if the product was entered correctly into the calculator.

Food and Beverage Fundraisers

- The reviewers are not aware of any food or beverage fundraisers occurring at Oaklawn Elementary or Menomonie Middle School. However, if food or beverage fundraisers occur in the future, please know that the items sold are subject to the Smart Snacks rule.
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools is a great way to make sure schools are meeting Smart Snacks regulations.

Findings and Corrective Action Needed: Smart Snacks

- No findings.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

- The district does a great job of ensuring staff are trained as required by the professional standards regulations for the school nutrition programs. The SFD provides in house trainings on a regular basis as well as opportunities for staff to attend outside training opportunities. All trainings are tracked. Employees track their own training hours and the FSD enters them into a spreadsheet. Technical assistance was offered during the review on the new USDA tracking tool for ease of reporting.

Findings and Corrective Action Needed: Professional Standards

No findings

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 was freely available to students during all meal times at all reviewed sites.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety Plans

- The Food Safety Plan was available at each reviewed site. It was obvious in observing the food service staff 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.

Temperatures

- Hot and cold prepared foods are periodically delivered to Oaklawn Elementary from the high school. Staff members at Oaklawn were able to clearly explain how these items are received and handled until service. It was evident that the procedures followed for these items ensure appropriate temperature control.

Food Employee Reporting Agreements

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

Buy American

- USDA requires that products used in the USDA child nutrition programs be produced in the United States to the extent possible unless it is excessively cost prohibitive, or is unavailable. SFAs that purchase non-American products must document justification as to why.
- The products identified during the onsite visit as noncompliant with the Buy American provision included canned pineapple (Indonesia), grape tomatoes (Mexico), fresh cucumbers (Mexico), canned fruit cocktail (China), canola oil, (Canada) and frozen Brussel sprouts (Belgium). The SFA had documentation from the distributors for each product showing that the item was either unavailable, cost prohibitive, or not grown in the United States. Thank you for maintaining accurate and appropriate documentation to justify the purchase of foods not produced in the US.

Findings and Corrective Action Needed: Food Safety and Buy American

Finding: The food safety inspection report is posted in a publicly visible location at Oaklawn Elementary was not the most recent inspection report.

Corrective Action Needed: The most recent food safety inspection report was promptly posted in location visible to public. Completed on-site; no further action required.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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

Commendations/Comments/Technical Assistance/Compliance Reminders

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year. The Food Service Director has successfully promoted these programs through a variety of outlets.

Breakfast Promotion

- While discussing breakfast participation with the Food Service Director and Manager at Menomonie Middle School, it was mentioned that breakfast participation is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>). A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).
- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).
- For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.
 - [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
 - [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)
- National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.
 - School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
 - Continue to promote participation in the School Breakfast Program with fun menus or promotions.

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>).

