

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Altoona School District

Agency Code: 180112

School(s) Reviewed: Altoona Middle School

Review Date(s): 2/13-15/17

Date of Exit Conference: 2/17/17

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 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, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the [DPI SNT webpage](#).
- 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 [DPI SNT GOALS webpage](#).
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the [DPI SNT Financial Management webpage](#) under *Unpaid Meal Charges* section.

Appreciation

Thank you to the staff at Altoona School District for the courtesies extended to us during the on-site review. Thank you for taking the time to respond to the off-site questions as well as pulling records for the on-site portion of the review, being available for in-person questions and for providing additional information when requested. All were very receptive to recommendations and guidance. It was truly a pleasure visiting the Altoona School District.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

295 eligibility determinations were reviewed, 1 errors were identified. Please see the *Finding* and *Corrective Action* below that addresses this error.

Applications

When benefit status increases to a greater benefit, the change must take place within 3 days.

When benefit status decreases to a lower benefit, the change cannot take place before 10 calendar days and a notice of adverse action must be sent in writing with appeal procedures.

Applications are to be processed at face value if the Determining Official (DO) is confident in the clarity of the information provided. The DO should follow up with information on any application that is not clear in order to process the application correctly.

Household Size Box

If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.

If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional office, any application that does not have this box completed is considered an incomplete application.

Annual Income

If the household provided only annual income, the SFA **must** follow up with the household to ensure that the amount is an accurate reflection of the household's current income.

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.

Disclosure

SFAs must seek written consent from the household to use information provided on the meal application or through DC for non-food service program purposes, such as athletic or testing fee waivers. Consent must be obtained each school year. A template [Sharing Information Form](#) is located on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

Alternatively, a SFA can ask programs requesting benefit information to have households self-disclose by providing a copy of their [Letter to Households of Approval/Denial of Benefit](#) notification letter. This option is encouraged as it reduces administrative recordkeeping for the SFA.

A [Disclosure Agreement](#) form should be signed and on file at the SFA for anyone receiving eligibility information to approve students for non-food service program benefits or with access to the meal benefit information. This form can be found on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#). The SFA is highly encouraged to work with their software system to ensure access to meal benefit information is only available to those with a ‘need to know’ reason.

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 received if a process is in place to capture when the application is received. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The DPI SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval

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.

To assist SFAs in reaching households with limited English proficiency, the DPI SNT provides the Wisconsin-ized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian on the [DPI SNT Free and Reduced Price Meal Applications and Eligibility webpage](#).

Direct Certification (DC)

As a reminder, you are required to run direct certification minimum of three times a year: at or near the beginning of the school year, three months after the initial run (November) and six months after the initial run (February). The effective eligibility date for a DC eligible student is the date of the original output file.

Verification

The SFA completed verification within the designated timeframes. The appropriate number of applications were selected for verification based on Standard Sampling. Documentation indicated a confirmation review took place by the Confirming Official (CO).

Meal Counting and Claiming

Lunch was observed on Tuesday, February 14th, 2017. Two (2) non-reimbursable meals were documented. Both meals had ½ cup fruit and/or vegetable but food from only two components. Meal 1 included only fruit and vegetables while Meal 2 included only fruit and grains. Please see *Corrective Action* below under *Offer versus Serve* to address this observation.

Breakfast was observed on Tuesday, February 14th, 2017. Reimbursable meals were correctly identified and claimed. No meal counting errors were observed.

The January 2017 claims for reimbursement for the National School Lunch Program (NSLP) and the Severe Need Breakfast Program (SNB) were reviewed and validated. No errors were identified.

Findings and Corrective Action Required

Finding #1: Benefits were incorrectly provided via DC for one (1) student, noted on the SFA-1 form.

Corrective Action Required: The household was followed up with during the time of the on-site and the a date of correction was noted on the SFA-1 form. **No further action is necessary.**

Finding #2: Two (2) lunch meals were observed to non-reimbursable at Altoona Middle School on Tuesday, February 14th, 2017. While both meals had ½ cup fruit and/or vegetable, in total each meal had only food from two components. Meal 1 had only fruits and vegetables while Meal 2 had only grains and fruit.

Corrective Action Required: Please submit a description detailing the training and steps taken to ensure future meals are all deemed reimbursable.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Appreciations

Thank you to all staff at Altoona School District for your hard work during this administrative review. Everyone was friendly, easy to work with, and did a great job preparing nutritious and delicious meals for students. Thank you to the Food Service Director, who had almost perfect breakfast and lunch weeks of review! As a new director, this is highly impressive and shows initiative in learning the regulations and meal pattern. Great job organizing labels, Child Nutrition (CN) labels, and Product Formulation Statements (PFS) in binders along with a la carte items and their Smart Snacks Calculator print-offs. Kudos to offering both a cold and hot menu option daily for both breakfast and lunch as this gives students a nice variety. Also, offering a second-breakfast food cart in the hallway has shown to be beneficial, both for increased participation and ensuring students are receiving a healthy, well-balanced breakfast. Many students came through the line! Nice menu options as well; not too few for students to choose from, but not too many for staff to prepare and serve. You and your staff are doing a great job!

Breakfast Offer versus Serve (OVS)

Please note that under breakfast OVS, students are required to have at least three items on their tray, one of which is ½ cup fruit or vegetable or a combination of both. Although all meals served during the day of review were reimbursable, it was thought that a student had to have an entrée as one of their items. Depending on how the menu is planned, a student could take a fruit and a milk and it would be a reimbursable meal. Consider the following example:

1 apple (1 cup fruit = 2 items) + 1 cup milk (1 item) = 3 items (1 of which is at least ½ cup fruit) = reimbursable meal.

However, if the menu planner is planning for an apple to be 1 item, the above scenario would require an additional menu item, in the form of a grain or fruit (or vegetable).

Production Records

Although not required, consider adding a column on production records showing component contributions. The salad bar production records had all meat/meat alternate (M/MA) items with a serving size of 2 oz. However, not all of these items credit ounce for ounce. Make sure to use USDA Fact Sheets, CN Labels, PFS, or the Food Buying Guide (FBG) to know how certain items credit. See examples below on different M/MA crediting:

Ham: 1.22 oz = 1 M/MA (per USDA Fact Sheet)

Chicken Fajita Strips: 3 oz = 2 M/MA (per PFS)

Cottage Cheese: 2 oz = 1 M/MA (per FBG)

Shredded, Cheddar Cheese: 1 oz = 1 M/MA (per FBG)

Beef Taco Filling: 3.17 oz = 2 M/MA (per CN label)

There are also some fruits and vegetables that do not credit by volume. For example, ½ cup tomato soup credits as ¼ cup “other” vegetable; 1 apple = 1 cup fruit; 1 pear = ½ cup fruit. Adding component contributions will make it easier for staff at the Point of Service (POS) to know how menu items credit as students come through the line, thus helping determine a reimbursable meal. DPI Production Record templates, which include columns for component contributions, can be found: [here](#). These can be tailored to your specific food service operation. See example below on additional column for component contribution:

	Recipe / Product #	Portion Size	Crediting
Chicken Fajita Strips	XXX	3 oz (by weight)	2 oz. eq. M/MA
Cottage Cheese	XXX	4 oz (by weight)	2 oz. eq. M/MA
Shredded Cheddar Cheese	XXX	2 oz (by weight)	2 oz. eq. M/MA

Fruit and Veggie Crediting

In the School Breakfast Program (SBP) and National School Lunch Program (NSLP), grains and M/MA are referred to in ounce equivalents (oz. eq.), while fruits and vegetables are referred to in cups, with 1/8th cup as the smallest creditable amount. The salad bar production records had romaine lettuce, carrots, cucumbers, etc. recorded in ounces. Consider updating production records so that these are written in 1/8 cup increments.

Offer versus Serve

Altoona Middle School Staff were knowledgeable on the requirements of reimbursable meals. Students were requested to return to the service line to select missing components.

Findings and Corrective Action Required

Finding #3: Two cereals sent for the week of review were not whole grain-rich. Specifically, the Frosted Flakes and Tootie Fruity cereals were not whole grain-rich. Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning greater than 50% of the product needs to be whole grain. When determining if an item is whole grain-rich, the first word in the ingredient list needs to say *whole* or have a whole grain listed first. The two mentioned do not.

Corrective Action Required: Please find new, whole grain-rich versions of the following products and submit nutrition facts labels and ingredient lists:

1. Frosted Flakes
2. Tootie Fruity

These cereals were taken off the menu prior to the onsite review. Other cereals will be offered, including Lucky Charms, Cocoa Puffs, Honey Graham Toasters, and Cheerios, all of which are whole grain-rich. **No further action is necessary.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Access to the SFA's Child Nutrition Report, which provides a compilation of meals claimed, reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, is described in the document [Viewing the Child Nutrition Report](#). The DPI Aids Register is also available to track all program deposits made to the SFA's account as well as the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. The Aids Register is available on the DPI SNT [Financial Management webpage](#). Both resources are also accessible from the [Online Services webpage](#).

Annual Financial Report

In SY 16-17, 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. Please note there are additional categories than in previous years:

- **NSL** - schools participating in the National School Lunch Program.
- **SB, SBSEVERE** - both regular School Breakfast and Severe Need Breakfast.
- **SK-NSL, SK-NSLAE** - both After School Snacks and Area Eligible Afterschool Snacks.
- **SMP** - Special Milk Program.
- **Grants** - all grant awards and expenditures.
- **WSDMP** - Wisconsin School Day Milk Program.
- **EN** - Elderly Nutrition.
- **Nonprogram Foods** - all Nonprogram Foods (including: a la carte items, adult meals, milk only, extra entrees, vended meals sold under a joint agreement, catered meals, vending machines, etc.)
- **CACFP** - daycare and supper meals claimed under Child and Adult Care Food Program.
- **SFSP** - meals claimed in Summer Food Service Program.

The [new SY 16-17 Annual Financial Report instructions](#) are located on [DPI SNT Financial Management webpage](#).

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”](#). For a more comprehensive overview, see [SP 58-2016: Unpaid Meal Charges Guidance](#). In addition, 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, as noted in [SP57-2016 Unpaid Meal Charges Guidance](#).

Paid Lunch Equity (PLE)

The SFA is in compliance with PLE.

Revenue from Nonprogram Foods

The SFA flagged for a comprehensive resource management review in the *Revenue from Nonprogram Foods* section as it sells nonprogram foods.

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
- Vending Machines operated by Food Service

All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals nor be absorbed by the food service account. Nonprogram food costs and revenues must be separated from program food costs and revenues. In regards to adult meals, 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, which are outlined in the [Wisconsin Adult Meal Pricing Worksheet](#). SFAs must reassess adult meal prices annually prior to contract submission to ensure student reimbursement is not being used to subsidize adult meals.

At a minimum, the [USDA Nonprogram Food Revenue Tool](#) must be completed yearly. The [DPI Nonprogram Food Revenue Tool/Calculator](#) aids in calculating prices of nonprogram foods and feeds into the USDA Nonprogram Food Revenue Tool to determine compliance with USDA nonprogram food regulations.

To complete the USDA Nonprogram Food Revenue Tool, the SFA must select a reference period of at least 5 consecutive operating days of a regular school week, and compare the reference period revenue ratio to the food cost ratio for the entire SFA to determine if the revenue ratio is equal to or greater than the food cost ratio (see Figure 1 below). Rather than separating all costs for the entire year (although recommended), SFAs must separate their non-program food costs from their program food costs for the selected period to complete the Tool. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance.

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

Figure 1 - Nonprogram Foods Revenue and Costs Ratio

Nonprogram food revenue is the dollar amount of nonprogram food sales sold through the nonprofit school food service account including la carte sales, adult meals, vending machines, extra/cold lunch milks, etc. Total program and nonprogram revenue includes the dollar amount from program and nonprogram food sales.

If using the DPI Nonprogram Food Revenue Tool/Calculator to complete the USDA Nonprogram Food Revenue Tool (recommended), to determine nonprogram food cost data, gather an itemization of all nonprogram foods offered during the selected reference period and enter the per item raw food cost of each nonprogram food and the number of servings/items sold in the selected reference period.

For total program and nonprogram food costs, include all program and nonprogram food costs. Program food costs data should be available using production records, invoices, etc.

The [Nonprogram Foods Revenue Rule SP 20-2016](#) and the [Nonprogram Foods In a ‘Nutshell’](#) can provide additional guidance and clarification on nonprogram foods.

Indirect Costs

As a reminder, 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.

Finding #4: The USDA Nonprogram Food Revenue Tool was not fully completed by the SFA. Technical assistance was provided during the on-site to the Food Service Director.

Corrective Action Required: Please submit a completed USDA Nonprogram Food Revenue Tool. If the Tool comes out in the red, requiring *Additional Revenue to Comply*, please submit a plan going forward for how the SFA will comply with the shortfall (i.e. raise nonprogram food prices and/or contribute non-federal funds to meet the required ratio.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Non-discrimination Statement

The SFA uses template letters from its software system which contain the required information for approval and denial of benefits. As a reminder, if the SFA develops or uses template letters from their software system, the documents should contain all of the information included on the DPI template letters including the full USDA Non-discrimination statement, which is available on the DPI SNT [Civil Rights webpage](#). When space is limited, such as on 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.

And Justice for All Poster

An “And Justice for All” poster was available and readable in the cafeteria.

Civil Rights Training

Civil rights training had been completed and documentation was available for review.

Civil Rights Self-Compliance Form

The Civil Rights Self-Evaluation Compliance form was completed prior to January 1st, 2017. Technical assistance was provided that the report should be completed by October 31st annually.

Special Dietary Needs

All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical practitioner. SFAs may use the [template Dietary Request Form](#) posted on the [DPI SNT Special Dietary Needs webpage](#). This template is also available in Spanish and Hmong. SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner.

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 still have a completed Dietary Request Form on file from a medical authority, such as a school nurse, to support the request. These types of accommodations must be made according to the USDA's meal pattern requirements in order for the meals to be claimed for reimbursement. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are being handled equitably.

Processes for complaints

Schools must have a process for receiving and processing complaints alleging discrimination within USDA Child Nutrition Programs. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the SFA must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. The [USDA Program Discrimination Complaint Form](#) is available to assist in filing these complaints and can be found on the [DPI SNT Civil Rights webpage](#).

Local Wellness Policy (LWP)

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 of 2010 (HHFKA). 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.

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. SFAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years (triennial assessment) to determine compliance with the policy, how the policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the triennial assessment, as well as the wellness policy and any updates to the policy, available to the public.

A summary of the requirements can be found at:

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 process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

The SFA's Local Wellness Policy (LWP) was reviewed and the SFA is reminded of the following:

- SFAs are required to permit certain groups to participate in the LWP development, implementation, review and update. The SFA is should to identify how individuals/groups can participate.
- Food and beverage marketing guidelines should be included in the LWP.
- The LWP should contain language regarding Smart Snack Standards
- Language should be included regarding the triennial assessment and how the results of the assessment will be made available to the public. Note, the assessment should determine compliance with the LWP, how the LWP compares to model policies, and process made in attaining the goals of the LWP. The assessment is not a simply a review and approved of changes to the LWP.

On-site Monitoring

The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) established the requirement to conduct on-site monitoring of the School Breakfast Program beginning in SY 2016-17. The 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](#). The [National School Lunch Program On-site Monitoring Form](#) and [School Breakfast Program On-site Monitoring Form](#) are currently available on the [DPI SNT Administrative Review webpage](#).

Breakfast and lunch monitoring forms were available for all schools in the District.

Professional Standards

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. 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.

The SFA provides yearly and on-going training throughout the school year. Documentation is well organized and all staff have met or are on track to meet continuing education requirements for SY 2016-2017.

As a reminder, training requirements for all staff are as follows:

Directors	Managers	Other Staff	Part Time Staff
	(20 hrs or more/week)	(less than 20 hrs/week)	
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Water

Water is required and available at no charge to students during lunch and breakfast meal services via a drinking fountain in the cafeteria. Technical assistance was provided to consider drinking glasses for students to encourage consumption of water in addition to their reimbursable meal.

Food Safety and Storage

Food Safety Inspections

The most recent food safety inspection was posted and available for review.

Food Safety Plan and Temperature Logs

A food safety plan was available for review. Temperature logs were being maintained and signed Employee Reporting Agreements were up-to-date and available for review.

Storage

The on-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. Storage rooms and freezers were orderly and clean.

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 small local farmers and provides healthy choices for children in school meal programs as well as supports the local economy. 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.

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.

SFAs must monitor contractor performance to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. This is accomplished by ensuring the product label designates the United States, or its territories, as the country of origin. Therefore, SFAs must ensure that products delivered comply with any Buy American contract provisions by reviewing products and/or delivery invoices/receipts to identify the country of origin is the United States or its territories. SFAs also need to conduct a periodic review of storage facilities, freezers, refrigerators, dry storage, and warehouses to ensure products comply with the Buy American provision, unless a limited exception has been approved.

The following item were found to be non-compliant during the on-site review:

- Fresh Bananas - Honduras
- Pineapple Tidbits – Thailand
- Mandarin Oranges – China
- Sliced, Ripe Olives - Spain

The SFA should work with its distributor to see if this product are available domestically. If not, documentation requested in the [Non-compliant Product List](#) should be obtained. Please note, the use of this form is the exception, not the rule. More information on this new requirement can be found on the [DPI SNT Procurement webpage](#). The SFA is encouraged to ask questions on this regulation during their Procurement Review.

Reporting and Recordkeeping

Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner. The SFA is meeting record retention requirements for USDA Child Nutrition Programs.

Smart Snacks in Schools

Smart Snack regulations went into effect on July 1, 2014 apply to all food and beverage items sold to students during the school day, with the school day being designated as midnight the night before until 30 minutes after the end of the school day. This includes foods sold through fundraisers with intended consumption during the school day (i.e. frozen pizza fundraisers would not be included as consumption is intended outside of the school day).

Since Smart Snack regulations apply to the entire school, it is important that all involved with the sale of food and beverage items, not just the food service department, be involved in monitoring and complying with the regulations. Involvement of school administration is highly recommended and encouraged. It is important to remember that the goal of Smart Snacks is not to regulate what student can and can't have but is in place to build healthy school environments and teach valuable life nutrition skills to all students.

The DPI SNT has developed several resources to assist schools and districts in meeting these regulations including a [Compliant Fundraiser Tracking Tool](#), an [Exempt Fundraiser Tracking Tool](#), a [Smart Snacks Tracking Tool](#), a [Smart Snacks in a Nutshell handout](#), and a [Smart Snacks – Strategies for Success handout](#).

Please visit the [DPI SNT Smart Snacks website](#) for more information.

Finding #5: '2nd price meals' or complete second meals are no longer allowed to be sold under Smart Snack regulations.

Corrective Action Required: Please provide a summary of how the SFA has addressed this finding. Please include a summary of how students and staff are informed and trained on the disallowance of complete second meals.

School Breakfast Program (SBP) Outreach

The SFA participates and meets promotion requirements for the School Breakfast Program (SBP). Parents play an important role in School Breakfast Program participation. A [video](#) was developed to show parents the benefits that the School Breakfast Program provides for them and their children. 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.

Summer Food Service Program (SFSP) Outreach

As part of the National School Lunch Program (NSLP), it is requirement to complete SFSP outreach. The purpose is to inform students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Options for outreach include informing families via email and/or newsletter about the availability of free summer meals via the [Summer Meals Map](#), the option to call 2-1-1 to connect with local health and humans services, the option to text 'food' to 877-877, and/or [posting free SFSP posters](#) in the SFA. For more information on Summer Food Service Program, please contact:

Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
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5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

While operated by the SFA, this program was not reviewed as it was located in Altoona Elementary School and Altoona Intermediate School. The Altoona Middle School was the School of Focus for the Administrative Review.

Program reminders for the WSDMP include:

- Schools must serve Wisconsin-produced milk. Please verify this with your distribution and include in your milk bid.
- Students of paid meal status that take milk during the operation of the WSDMP cannot be claimed in the program and must be assessed a charge for the milk. If the SFA wishes to provide milk to paid students free of charge, it can but the cost cannot be absorbed by the food service account. A transfer from an outside fund (i.e. SFA's General Fund/Fund 10) to the non-profit food service fund would need to be completed.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". 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 webpage dpi.wi.gov/statesupt/agenda-2017.

