

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

**School Food Authority: Rosendale-Brandon
School District**

Agency Code: 20-4956

**School(s) Reviewed: Brandon Middle School,
Laconia High School**

Review Date(s): March 19-21, 2018

Date of Exit Conference: March 21, 2018

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

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

General Program Reminders/Updates:

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Rosendale-Brandon School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were

very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff at Rosendale-Brandon School District for their willingness to make changes to meet school nutrition program regulations. We observed lunch meal service at Laconia High School and Brandon Middle School. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu choices, meal service models, civil rights and staff training. The district will continue work on their local wellness policy. We were impressed during meal service that some additional items were available for A la Carte purchase at the high school and a special seasoning station was out with the condiments. The staff and students at Brandon Middle School were efficient, friendly and operated a well-run serving line. They were kind to the customers.

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

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- A sampling of one hundred fifty-five students eligible for free or reduced meal benefits was reviewed; there were no errors. Nice work!
- The determining official reviews the applications and contacts the households to have a complete application in order to give correct benefits.
- Benefits are determined, entered into the Power School system and parents notified quickly, definitely within the 10 days window.
- Direct certification runs are matched more often than required.

Technical Assistance:

- (TA) When an application only has one frequency of payment (weekly, twice monthly, every two weeks, monthly, or annually) indicated for all of their reported incomes on the application, the income should not be converted to monthly, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) (IEG) one would look at the amount of their income under the column indicating that stated frequency (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- (TA) When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Compliance Reminders:

- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter](#)

[to Parents/Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx).

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

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

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The Local Educational Agency (LEA) must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx).

Note: aggregate data (just F/R numbers or percentages without a connection to individual names) does not require prior parental sign-off before sharing and often times satisfies the request, nor for ACT testing or AP testing fees.

Verification

Commendations:

- The verifying official uses the helpful tracker to follow the verification process.

Technical Assistance:

- Use standard rounding when household include a decimal and cents or found during the verification process.

Findings and Corrective Action Needed - Verification

Finding # 1: The verifying official begins the verification process by selecting the sample size. This was being done off the wrong number – the number of all approved applications on file as of October 1 must be used.

Corrective Action Needed: Submit a plan and titles of people to complete the verification process, including how applications will be selected.

Meal Counting and Claiming

Technical Assistance:

- Review the edit check monthly of each site before claims are submitted to check for number of eligible students versus number of meals per day and number of serving days in the month.
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2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the school nutrition staff at Rosendale-Brandon School District for all they do to feed the children of their district healthy, good food. We appreciate your time and efforts spent preparing for and participating in the onsite review. All school nutrition staff were welcoming and professional. They had pleasant interactions with students during observed meal services. Kitchens and service areas were very clean as well. The Food Service Director (FSD) was available to answer questions and receptive to feedback.

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-) techniques to encourage students to make healthy food choices (https://dpi.wi.gov/sites/default/files/imce/school-

nutrition/pdf/wp_ch6.pdf). 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 (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies>).

Grain Shortages and Production Records

Several foods offered on the current menu credit as a 1.0 ounce equivalent (oz. eq.) of grain. If a student chooses the same 1 oz eq grain product each day, this would result in a daily and weekly grain shortage. Offering two of some items or bundling items to offer at least 2.0 oz eq daily will help avoid daily and weekly grain shortages. Under Offer Versus Serve, high school students must be offered at least 2.0 oz eq daily at lunch, but the student can choose whether or not to choose it. Reviewing cycle menu production records often will help in avoiding inadvertent shortages.

Technical Assistance was given on site, no further action needed.

Findings and Corrective Action Needed:

Standardized Recipe

Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient (even if it is water) should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service kitchen. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. This will be a continuous work in progress as you modify older recipes and update recipes with current ingredients in stock. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA's *What's Cooking?* Quantity recipes, especially when substitutions are made.

Continue to use the resources on our website regarding [recipe standardization](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained.

- **Meal Pattern Finding #1:** Standardized Recipes are required for all menu items that contain more than one ingredient, and need to be standardized to the kitchen the item is being prepared in with the ingredients used on site.

Corrective Action Needed: Please submit the following recipes that have been standardized to your production kitchens.

- Lasagna
- Chef Salad (The Brandon Middle School recipe could be used at the high school; the recipe should be the same throughout the district).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Compliance Reminders:

- SFAs must limit the net cash resources in order to not exceed three months average expenditures.
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>)
- If alternate meals are offered to students with a negative account balance and it is not a reimbursable meal that can be claimed, the cost of that food must be reimbursed to the food service fund (Fund 50) from another fund.

Findings and Corrective Action Needed – Nonprofit School Food Service Account

- ❑ **Finding # 2:** All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be allocated to the program to which they belong, and this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>). The purchase record template on the DPI website may aid in this expense and revenue separation. The Annual Financial Report was completed, but not according to the new format of breaking out nonprogram foods expenses and revenues, per the instructions.

Corrective Action Needed: Submit a statement describing the plan for coding invoices from school nutrition purchases and the process for the correct dollar amounts to be entered in the Annual Financial Report.

Paid Lunch Equity (PLE)

Commendations:

- This district’s weighted average price for paid meals for this school year is \$2.58. The USDA target price is \$2.86.
 - The 2018-19 PLE tool will be released soon.
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Revenue from Non-program Foods

Technical Assistance:

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), and Catered Events.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

Findings and Corrective Action Needed – Revenue from Nonprofit Foods

- ❑ **Finding # 3:** The Nonprogram Foods Revenue Tool has not been completed for the current school year, nor would the USDA tool represent the correct food cost allocation from the previous 2016-17 school year because the nonprogram foods were not broken out. This is an annual requirement.
Corrective Action Needed: Watch the [Nonprogram Foods Revenue Tool webcast](#) and provide a copy of the completed quiz questions and a completed tool for Rosendale-Brandon School District using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).
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4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

- The school nutrition director plans the “call back” meeting in August and includes the required civil rights training. Volunteers, cashiers and office staff serving as eligibility officials complete the training, as well. Please include staff who assist with translating application materials for households.
- The [Civil Rights Self-Evaluation Compliance](#) form was completed by October 31; this is the PI-1441 document to be completed annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).
- Special dietary needs are met usually with accommodating the child’s meal needs. Some children have a note on file from a licensed medical authority with needs met by school nutrition staff.
- “And Justice for All” posters are posted in public view where the program is offered.
- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. The correct language was posted in the Brandon Middle School serving line. Thank you.

Processes for complaints

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days.

- All SFAs should have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. If an individual states they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Technical Assistance:

- Change the nondiscrimination statement on the low balance notices to parents to be compliant with the short statement (one sentence).

On-site Monitoring

Commendations: The onsite monitoring was completed for each cashier/Point of Service area with the cashier and the school nutrition director.

Local Wellness Policy

Compliance Reminders:

- The local wellness policy (LWP) requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.
- At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.
- Local wellness policies must contain statements and practices that support the USDA final rule from August 2016.
- When updating the LWP consider all areas of schools that food or beverages are sold or provided for students during the school day (midnight until at least 30 minutes after the end of the typical school day at each building). With the Smart Snacks in Schools rule, advertising of foods or beverages which are non-compliant should not be in public spaces; for instance, the soda in the locked cooler in the lunch service area at Laconia High School.

Findings and Corrective Action Needed – Local Wellness Policy

- **Finding # 4:** Rosendale-Brandon School District's LWP was approved in 2006 and revised in 2009. It will need to be updated to the final rule requirements, approved by the Board of Education and communicated to all families in the district.

Corrective Action Needed: Submit a plan to update the Local Wellness Policy (LWP) and a draft copy to the consultant that includes all areas covered in the USDA final rule as listed:

- *policy leadership – who will be responsible for oversight
- *public involvement – by adding teachers, students, parent

- *reference the Healthy Hunger-free Kids Act of 2010 for school nutrition requirements
- *foods sold outside of the school meal programs
- *foods provided, but not sold – like rewards, etc.
- *food and beverage marketing – according to Smart Snacks
- *nutrition education – at least one goal
- *nutrition promotion – using evidence-based strategies, like Smarter Lunchroom techniques
- *physical activity - at least one goal
- *other school-based strategies for wellness
- *define how the LWP will have a triennial assessment
- *update/inform the public about the content of the LWP and its implementation.

Resources:

- The [Local Wellness Policy checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) is a wonderful resource to evaluate the district's LWP (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf).
- [DPI's webpage on the Wellness Policy](https://dpi.wi.gov/school-nutrition/wellness-policy) offers many other resources, like a Policy Builder (https://dpi.wi.gov/school-nutrition/wellness-policy).

Smart Snacks in Schools

Commendations

Thank you for spending the time and assuring the items you have stocked in the FSD's vending machines are Smart Snack compliant.

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. [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) is a clear concise sheet with information. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf). Schools agree to comply with the regulations set forth by USDA when they choose to participate in the child nutrition programs; willful noncompliance of regulations can result in the loss of federal funding.

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 (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks). There is a [Smart Snacks webinar](https://dpi.wi.gov/school-nutrition/training/webcasts#ss) for more information (https://dpi.wi.gov/school-nutrition/training/webcasts#ss).

Findings and Corrective Action

- **Finding # SS 1:** The FSD is responsible for two vending machines in the cafeteria. The FSD has run all items through the Smart Snacks calculator and provided all documentation. One item was discovered non-compliant.
 - Technical assistance:** provided on site. FSD will sell through opened case and return unopened cases to vendor or sell remaining stock to the concessions. **No further action required.**

- **Finding # SS 2:** A third vending machine located in cafeteria stocked and operated by the wrestling team. Currently stocked with chocolate milk, 14 oz bottles, 1% flavored and whole milk varieties. These items are not Smart Snacks compliant as they are too big, also 1% flavored and whole milk are not allowed.
 - Corrective action required:** Timer must be installed, allowing students to purchase items 30 minutes after the end of the school day or items must be removed and replaced with items that are compliant. Please submit a statement indicating a timeline when this will occur and name with contact information of individual responsible for this machine and the correction.

- **Finding # SS 3:** Brandon Middle School has a vending machine. No documentation was provided.
 - Corrective action required:** Please provide documentation on items vending machine is currently stocked with, also name and contact information of individual responsible for maintaining this vending machine. Also indicate the plan of action to replace/ensure beverages are age compliant.

Resources:

Smart Snacks ["In a Nutshell"](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) and the [Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) are great resources in determining compliant products to sell to students during the school day (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>, <https://foodplanner.healthiergeneration.org/calculator/>).

Professional Standards

Commendations:

- The school nutrition director tracks trainings of staff and provide opportunities for staff to attend summer classes.
- Thanks for including the cashiers and translators for the annual civil rights training.

Technical Assistance:

- 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.).

Compliance Reminders:

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National

School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.

- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Include tracking of training hours for the determining official/verifying official/claim preparer, confirming official and business manager for entering the annual financial report.
- 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>).

Food Safety, Storage and Buy American

Commendations:

- Temperatures of cooling equipment and food items are recorded daily.
- A complete food safety plan was available at each site for employees to view and follow.

Technical Assistance:

- [A Flash of Food Safety](http://www.fns.usda.gov/ofs/food-safety-flashes) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Compliance Reminders:

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternative
Heat-treated plant food, such as cooked rice, beans, and vegetables	

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.

- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Buy American

- The USDA requires that an 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.
- It is expected that the following products will require an exception to Buy American provisions: pineapple, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin is identified on the label, than SFA must get certification from the 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 accepted within an email.

Findings and Corrective Action Needed – Buy American

- **Finding #5:** 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:
 - Mandarin Oranges from China
 - Canned Pineapple from Indonesia
 - Nestle Trio Gravy from Canada

Corrective Action Needed: Begin gathering forms for each noncompliant product in your storage or operation. Submit a copy of one noncompliant item noted with a form.

Reporting and Recordkeeping

Commendations:

- Records pertaining to the school meal programs are maintained for the minimum 3 years plus the current school year.
- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

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

Technical Assistance:

- The district may want to consider offering breakfast for students at different levels. Currently there is a nutrition break with food and beverage sales at the middle school and high school level mid-morning. DPI has [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>).

Compliance Reminders:

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text ‘Summer Meals’ to 877-877 to find Summer sites
 - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program (SMP)

Compliance Reminders:

- Although this Administrative Review did not review the SMP, we are alerting the district that children not yet in Kindergarten are not to be served flavored milk. Plan for removal of flavored milk in the SMP for school year 2018-19.

Resources:

- Beginning on **October 1, 2017**, the updated Child and Adult Care Food Program (CACFP) meal pattern replaces the current meal pattern options for SFAs serving infants and/or children aged 1-5 years old and not yet in kindergarten. The CACFP meal pattern requirements were updated to better align them with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010.
- There is a [new meal pattern for children under five years](https://www.fns.usda.gov/sites/default/files/cacfp/CACFP_MealBP.pdf) old (https://www.fns.usda.gov/sites/default/files/cacfp/CACFP_MealBP.pdf).

Wisconsin School Day Milk Program (WSDMP)

Technical Assistance:

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5th grade.

- Point of Service Counts (POS) for the Wisconsin School Day Program and the Special Milk Program must be recorded by who “did” take milk at the time the child receives the milk.
- Per the Agreement for the WSDMP in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and perhaps include that stipulation in the SFA’s milk bid.
- The [WSDMP application](https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc) on file is out-dated and must be revised, finding the template on this link: (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc>).

Findings and Corrective Action Needed – Wisconsin School Day Milk Program (WSDMP)

- **Finding # 6:** Milks must be recorded as the student receives the milk in the cafeteria or classroom. They may be pre-marked in Power School/MBA Cafe, but must be verified at milk break time.
Corrective Action Needed: Evaluate the WSDMP milk classroom claiming process for School Year 2018-19 and submit a [revised contract](#) with the DPI consultant. The process just needs to be more defined that milks are counted when the student receives the milk at break time. Perhaps a copy of the milk order is printed and double-checked at time of service or counts taken in one fashion and entered into the software system at time of service.

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

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

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

