

# USDA Child Nutrition Programs Administrative Review Summary Report

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School Food Authority: Laona School District

Agency Code: 21-2940

School(s) Reviewed: Laona High School

Review Date(s): 11/7/17-11/9/17

Date of Exit Conference: 11/9/17

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

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

## General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, 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).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.US Department of Agriculture.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.US Department of Agriculture.gov/healthierschoolday).

- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

### **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Laona 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.

### **REVIEW AREAS**

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

#### **Community Eligibility Provision (CEP) and provision 2 (P2)**

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

- Continue to maintain all certification and Base Year records for Provisions 2 and CEP, which support subsequent years' reimbursements. These records must be retained during the entire period the option is in effect, including all extensions. Additionally, such records must be retained for three years after submission of the final claim for reimbursement for the last fiscal year that used the base year data. If open audit findings have not been resolved, records must be retained beyond the three-year period as long as required for the resolution the audit.
- For CEP, the current identified student percentage (ISP) and claiming percentages are approved through the 2017-18 SY. If you would like to continue participation in CEP for another 4-year cycle, the agency will need to re-apply by June 30, 2018. **Run direct certification by school code for the full enrollment *on or slightly before* April 1, 2018.**
- P2 and CEP sites will need to inform the SNT annually of the intent to continue participating, or of any significant changes to participation (i.e. withdrawal, change of participating schools, groups or a requested increases to percentages).
- Continue to cost-allocate expenses back to the district for processing and distributing Alternate Household Income Forms in CEP and P2 schools. Alternate Household Income Forms and labor hours involved with processing them cannot be paid for from the nonprofit school food service account. Alternate Household Income Forms are not subject

to verification, independent review of applications, and the certification and benefit issuance portion of the AR review.

### **Direct Certification**

As a reminder, in a P2 non-base year and for CEP, you are required to run direct certification at or near the beginning of the school year, for the Special Provisions Match Report. It is also a best practice to run DC for the full enrollment on or slightly before April 1 each year.

In a P2 base year, run DC at the beginning of the school year (after July 1), 3 months after the first run, and 6 months after the first run.

### **Disclosure**

#### **(For USDA applications in base-years and any Direct Certification Runs for P2/CEP)**

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

### **Public Release**

- Great job sending it to the local media and having it published!
- Sent to multiple grassroots organizations to spread awareness of Laona's CNPs, wonderful!
  - P2 non-base years & CEP, use a [modified public release](#) (income guidelines not included) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-public-release.doc>)
  - P2 base year & CEP, use one "[mixed district](#)" [public release](#), which satisfies both the standard public release (income guidelines included) & the CEP public release (modified without income guidelines) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-mixed-district-public-release-1718.doc>). You may need to change the language a bit on this template to fit the unique needs of a mixed P2 and CEP agency.

## Findings and Corrective Action Needed

No findings. Great job!

## Verification

### Commendations/Technical Assistance

No findings. Great job! As a reminder the 1718 SY Verification Collection Report (VCR) is due February 1, 2018. [Instructions](#) to complete the VCR can be found on the SNT website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).

## Meal Counting and Claiming

### Comments/Technical Assistance/Compliance Reminders

- All meals and WSDMP milks claimed for reimbursement must be counted, recorded, consolidated, and reported through a system that *consistently* yields accurate claims.
- SFAs may claim school-aged visiting students. For CEP and P2 sites, include visiting students in the total count for reimbursement. If claiming, the SFA would not collect payment from the visiting students.
- During meal service, if a student chooses only milk (declines the reimbursable meal), he/she should be charged for the milk as an a la carte item.

## Findings and Corrective Action Needed

### **Finding #1:**

- Non-systemic consolidation error (underclaim) for the review period at the High School.
- Systemic counting and claiming error, which yields inaccurate, unreliable point of service counts at the CEP Elementary site. Students are checking off their own names, meals are claimed in the absence of a check mark, check marks are illegible or multiple check marks are indicated for a single student.

**Corrective Action Needed:** Submit a statement explaining how the agency will correct the point of sale and claim consolidation system to *consistently* yield accurate counts. Reviewer discussed designating an adult to remain at the point of sale for the entire meal service and the use of an alternative counting method (e.g., [check-off sheet](#) or token) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

- Once the point of sale system has been corrected, **submit 30 consecutive operating days of corrected counts** (point of sale roster sheets and supporting edit check forms) for the Severe Need School Breakfast Program and the National School Lunch Program at the Elementary School. The counts will be used to correct the closed claims from the months of September and October, 2017. **This full recalculation may result in fiscal action. USDA does allow for a \$600 disregard before funds are reclaimed.**

- ### **Finding #2:** Inaccurate point of sale system for field trip meals. The agency is claiming based on attendance and/or forecasted numbers.

**Corrective Action Needed:** Submit a written statement explaining how the system will be improved to yield an accurate point of sale. Reviewer discussed sending a student roster or check-off sheet with the teachers on the field trip. A supervising staff member would then check that a reimbursable meal was received at the point of sale and return the list to foodservice. Food service would then use this list (actual participation counts) to consolidate the monthly claim.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations:**

Thank you for the warm welcome to Laona School District. All staff and students were pleasant, easy to work with, and receptive to feedback. Great job to kitchen staff during breakfast and lunch meal service. It was evident everyone had a good understanding of Offer versus Serve (OVS) and rapport with students.

Thank you to the Food Service Director for the organization of documentation, including nutrition facts labels, CN labels, product information, and production records. This helped expedite the review process and showed attentiveness and initiative working with these Child Nutrition Programs. Congratulations on a perfect lunch week of review! There were no shortages or missing components and all documentation was provided. Signage was clean and in a good location for students to read and select a reimbursable meal. The bulletin board with food components and pictures was a great additive to the cafeteria. The “Did you know?” on the breakfast and lunch menus are a nice way to get students excited about school meals! Great job to all staff for doing a wonderful job managing both the School Breakfast Program (SBP) and National School Lunch Program (NSLP).

### **Comments/Technical Assistance:**

#### **Crediting**

Some of the menu items for the week of review were credited incorrectly. For example, many of the fruits and vegetables were not credited by volume served. Also note that dried fruit is credited double the volume served due to drying and being in a more concentrated form (i.e.  $\frac{1}{4}$  cup serving =  $\frac{1}{2}$  cup fruit).

#### **Menu Item**

Remember to be specific on production records with menu items (i.e. number of product, recipe number, count, etc.).

- The oranges were written as “oranges” with no size or count specified.
- Lettuce should be identified by type (i.e. Romaine, Iceberg), as many are in different vegetable subgroups (Romaine is a Dark Green vegetable and Iceberg is in the Other vegetable subgroup).

#### **Standardized Recipes**

Make sure all recipes are standardized to your operation and reflect what you are actually doing.

- For example, the Grilled Cheese Sandwich had outdated information with enriched bread and did not break down different serving sizes per age/grade group (2 slices cheese for K-8 and 4 slices cheese for 9-12).
- The Meatball Sub recipe had incorrect information. If the recipe is for 200 servings, with 5 meatballs and 1 whole grain hot dog bun each, then the total weight of each ingredient is incorrect; 30# meatballs would be enough for 184 servings – need 200 and 3 cases of buns would be enough for 360 servings – only need 200. We talked with the food service director about adjusting this recipe to 180 servings. The math to accommodate this is below:
  - Meatballs: 184 servings/case → 180 servings ÷ 184 servings/case = **1 case**
  - Marinara Sauce: 12 cups/#10 can → 180 servings × ¼ cup each = 45 cups ÷ 12 cups/#10 can = **3.75 #10 cans**
  - WG Bun: 120 buns/case → 180 buns ÷ 120 buns/case = **1.5 cases**

### Production Records

If you have a standardized recipe, you do not need to list each ingredient on the production record. You can simply reference the recipe number and have the crediting on the production record. Also, make sure the planned number of meals are filled out daily. Some of the production records sent for the week of review did not contain this information. With OVS, the menu planner does not need to plan one of everything for each student. This is where historical data from past production records help to forecast the amount needed. Many of the actual number of servings prepared/available in purchase units were incorrect during the week of review. For example, if planning for 100 – ½ cup servings of pears, and there are 24 – ½ cup servings per #10 can, you will need to prepared a little over 4 - #10 cans, not 3.

### Field Trip Meals

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of potentially hazardous food, establishing a way for collecting meal payments, and obtaining a total reimbursable meal count. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf).

### Low and Reduced Sodium Products

Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, olives, and processed food items. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years. Some of the canned vegetables and condiments found during the day of onsite review were notably high in sodium. To the best extent possible, consider purchasing low- or reduced- sodium versions of these products. Specifically, the BBQ Sauce and Canned Refried Beans were high in sodium.

Resources containing facts about sodium and how to reduce sodium in meals are available on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#sodium) webpage, under the Sodium heading. (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#sodium).

**Findings and Corrective Action Needed:**

- ❑ **Finding #1:** All grains offered in school meal programs are required to be whole grain-rich, meaning 50% or more of a grain product needs to contain whole grain (i.e. whole corn, whole wheat, etc.). The Rice Krispies Cereal served during the week of review was not whole grain-rich as the first ingredient was “rice”, which is not a whole grain.

**Corrective Action Needed:** Please find a whole grain-rich product to replace the Hospitality Crisp Rice and submit a label or submit a plan for how these will be disallowed going forward. **The Food Service Director will discontinue buying and serving the Rice Krispies Cereal in School Meal Programs due to their non-compliance. No further action required.**

### 3. RESOURCE MANAGEMENT

#### **Nonprofit School Food Service Account**

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

##### **Annual Financial Report (AFR):**

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. This will aid the school in calculating a “yearly” reference period for nonprogram food compliance if the agency continues to offer more than adult meals and extra milk moving forward. 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 our website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).

##### **Allowable Costs**

Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial). As a reminder, WI does not allow indirect cost rates to be applied to the food service account.

##### **Unpaid Meal Charge Policy**

This policy requirement *does not* apply to SFA-wide nonpricing agencies, meaning Laona is exempt from this requirement while participating in the special provision options. If the agency returns to standard counting and claiming at one or more site, a meal charge policy must be developed.

#### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

- ❑ **Finding #1:** The full cost of cafeteria tables and chairs purchased in the 1617 SY and in the current SY are allocated to the foodservice account. The tables and chairs are used for other non-food service related purposes throughout the school year.

**Corrective Action Needed:** Conduct a time study to prorate the amount allocated to the food service account. Work with our procurement specialist, Randy Jones at 608-267-2277 to develop a method to properly prorate the expense. Because there was a large operating transfer made at the end of the 1617 SY, once the time study is complete, contact the consultant to determine if an adjustment needs to be made to the 1617 SY Annual Financial Report (AFR) under “equipment” expense and “operating transfer”.

❑ **Finding #2:** The foodservice director is using her labor time, which is paid in full out of the food service account, to stock a non-foodservice related vending machine.

**Corrective Action Needed:** Discontinue this practice, or conduct a weekly time study to support the portion of food service labor that must be paid by an outside account (e.g., Fund 10). Submit a written statement explaining how the agency will move forward.

**Paid Lunch Equity (PLE)**

Laona is exempt from the PLE tool regulations as an SFA-wide non-pricing agency.

**Revenue from Nonprogram Foods**

**Comments/Technical Assistance/Compliance Reminders**

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk, the paid portion WSDMP milks, Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. 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 annually, at a minimum, if the agency sells more than adult meals and extra milk. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are exempt from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>). All costs must still be covered.

## Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.

## **Findings and Corrective Action Needed: Revenue from Nonprogram Foods**

- ❑ **Finding #1:** The agency did not complete the nonprogram food revenue tool for the 1617 SY. The SFA was unaware that caterings and a food service operated vending machines fell under nonprogram foods. Reviewer completed tool and provided TA to assess compliance, which showed nonprogram food cost ratio > nonprogram food revenue ratio. A transfer was made by the agency from the general fund to cover the nonprogram food deficit.

**Corrective Action Needed:** Submit a written statement indicating how the SFA will proceed with handling caterings and vending.

- If these items no longer flow through the food service account, the agency is exempt from completing the USDA nonprogram food revenue tool. Costs (food, labor, supplies) must still be covered for paid WSDMP milks, adult meals, and extra milks.
- If the agency continues to conduct caterings through the food service account, all costs must be covered (food, labor, supplies—not just food cost). In addition, the invoicing system should be improved and standardized.

- ❑ **Finding #2:** Nonprogram foods were not allocated properly on the 1617 SY Annual Financial Report (AFR). The numbers reported only capture extra milks. In 1617, the agency also had adult meals, caterings, and food service operated vending.

**Corrective Action Needed:** Update the 1617 SY AFR (re-submit online) by pulling out the revenues and costs under NSLP and/or SBP for adult meals, caterings, and vending-- combine with the extra milk revenue and costs under the nonprogram foods category.

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

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

#### **Nondiscrimination Statement**

When including the [non-discrimination statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). When space is

limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document

### **Civil Rights Training**

- Civil rights training was conducted and documented on a yearly basis for all nutrition staff.
- All staff who administer any portion of a school nutrition program must partake in Civil Rights Training.

### **Special Dietary Needs**

- All food substitutions *made outside of the meal pattern* requirements must be supported by a signed medical statement by a Wisconsin Recognized Licensed Medical Practitioner. A [prototype Medical Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) for Special Dietary Needs is posted on the DPI website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a *licensed medical practitioner*. These meals do not need to meet meal pattern requirements.
- School food service staff may make food substitutions, at their discretion, for children for who do not have a signed medical statement from a licensed medical practitioner. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- For lunch and breakfast (federal programs), juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA.
- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow’s milk and pre-approved through DPI. Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP (state program), allows juice as a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use.

### **Corrective Action**

**Finding:** The calendar menu has the incorrect shortened nondiscrimination statement.

**Corrective Action Needed:** Change the Nondiscrimination statement on the menus to say “This institution is an equal opportunity provider.” Submit a copy of the corrected menu.

### **On-site Monitoring**

Even though the agency has two schools, because the schools are in the same building and have the same point of service (POS), the agency is not required to do on-site monitoring.

### **Local Wellness Policy**

#### **Commendations**

- DPI would like to commend the Laona School District on its commitment to child nutrition by scheduling a full 20 minutes for meals. This gives students enough time to eat without being rushed (or unable) to finish their meals.
- DPI would also like to commend the school district on the makeup of the wellness committee members. It represents a comprehensive cross section of stakeholders.

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

#### **Content of the Wellness Policy**

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. LEAs 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.
- Plan for measuring policy implementation.
- **Designation of one or more officials as being 'in charge' of the policy.**

**SFAs must complete an assessment of the policy every three years** to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

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](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](https://healthymeals.nal.usda.gov/school-wellness-resources) (<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>).

### **Corrective Action**

❑ **Finding #1:** SFA LWP meets some but not all requirements as stipulated above (1000)

**Corrective Action Needed:** The Laona School District has a wellness policy which meets the general content requirements. However, it is also required that SFA's identify the position title of the LEA or school official(s) responsible for oversight of the local wellness policy. Please submit a written statement of what position(s) will be designated as having oversight of the wellness policy.

### **SFA is required to complete an assessment of the LWP (1005)**

#### **Technical Assistance:**

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy](https://dpi.wi.gov/school-nutrition/wellness-policy) webpage (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>).
- The Laona School District's use of The Fuel Up and Play 60 Wellness Investigation is a piece of this assessment as it may help in assessing district compliance with its own policy as well as how the district is progressing toward its goals. Assessment of progress toward goals of policy must be part of the triennial assessment. Additionally, the below-mentioned Wisconsin Obesity Prevention's Wellness Policy project would have compared the LWP to model policies.

Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your schools report is available at the [Wisconsin Health Atlas](https://www.wihealthatlas.org/lwp/) webpage (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](http://wellsat.org/)) for assistance in assessing the LWP (<http://wellsat.org/>).

## Smart Snacks in Schools

### Comments/Technical Assistance/Compliance Reminders

All food and beverages sold to students during the school day must meet Smart Snacks Regulations. Please refer to DPI's [Smart Snacks "In a Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>). See Smart Snacks Standards for beverages below:

	Elementary	Middle School	High
Water (plain), <i>flat or carbonated</i>	All sizes	All sizes	All sizes
Low-fat milk (unflavored)	≤8 fl oz	≤12 fl oz	≤12 fl oz
Fat-free milk (flavored or unflavored)	≤8 fl oz	≤12 fl oz	≤12 fl oz
100% juice, <i>can be diluted with water; flat or carbonated</i>	≤8 fl oz	≤12 fl oz	≤12 fl oz
No-calorie beverages (<5 kcal/8 fluid oz; ≤10 kcal/20 fluid oz), <i>flat or carbonated</i>	Not allowable	Not allowable	≤20 fl oz
Low-calorie beverages (≤5 kcal/fluid oz), <i>flat or carbonated</i>	Not allowable	Not allowable	≤12 fl oz
Caffeine	Not allowable	Not allowable	Allowable with no restriction

### Findings and Corrective Action Needed:

- Finding:** Foods and beverages sold in schools during the school day to students must meet Smart Snacks Standards.

Because this is a K-12 building and everyone has access to the vending machines, the beverages within them need to follow the most restrictive guidelines based on the youngest age/grade group.

For example, K-5 can only have:

- plain water in any size
- 8 fl. oz. low-fat white milk
- 8 fl. oz. fat free (any flavor) milk
- 8 fl. oz. 100% juice

There were vending machines with non-compliant beverages based on the age/grade groups in the building (i.e. 20 fl. oz. bottles). As these are turned on during the school day, consider adding signage explaining beverages are for high school only.

There were also non-compliant beverages for any grade groups. The following are unallowable beverages under the Smart Snack guidelines for any grade groups:

- 20 fl. oz. 130 Calorie Gatorade
- 20 fl. oz. 45 Calorie Gatorade

We recommend using the [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) (<https://foodplanner.healthiergeneration.org/calculator/>) 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.

**Corrective Action Needed:** The following beverages are non-compliant with Smart Snacks standards. Please submit a statement describing changes the SFA will make to the beverages sold in vending machines during the school day to comply with Smart Snacks regulations or update the current Local Wellness Policy.

- All 20 ounce beverages with Calories (20 fl. oz. Gatorade with 130 Calories, 20 fl. oz. Gatorade with 45 Calories)

Please also submit a statement describing changes the SFA will make to restrict access of beverages to the appropriate age groups.

## Professional Standards

### Commendations/Comments/Technical Assistance/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.
- Appreciate the effort & time dedicated by the New Director as she works on her GOALS Certificate and trains her staff!
- Current staff have the appropriate training hours logged for their specific job.
- Training should be monitored on a *central* tracking tool. Include all current training hours for each food service employee onto the DPI tracking tool under Professional Standards.
  - SFAs should clearly document all required training information and maintain that file including *the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff)*. Learning codes are not required, but encouraged.
- Job specific trainings, including Civil Rights Training, needs to be completed by:
  - All teachers who will be checking kids in for lunch
  - Business manager completing the Annual Financial Report

- New Secretary training on the basics of School Nutrition Programs
- Annual training must be job-specific and intended to help employees perform their duties well.

### **Annual Training Requirements for All Staff**

Directors: 12 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

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

Staff with duties outside of foodservice: <4 hours, or trained on job specific tasks

### **Food Safety, Storage and Buy American**

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

Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

- Food safety plans were in compliance & posted in a public place
- Director is continuously reviewing the food safety plan with staff

#### **Sharing Table**

If considering a sharing table, it is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

The food safety plan for the specific serving locations where sharing tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.

1. Items on the sharing table are limited to school meal or snack components. Food items brought from home are excluded.
2. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
3. Food on sharing tables is not for adults (e.g. food service staff, aides, teachers, custodians).

#### **Buy American**

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

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.

- If no country of origin is identified on label, the SFA must get certification from the distributor or supplier stating: “We certify that “X food item” was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can be accepted within an email.
- Label should indicate if the product is *grown, processed and packed* in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.

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 (e.g., cost, seasonality, availability, substitution, distribution). Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions. The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.

More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### **Findings and Corrective Action Needed**

**❑ Finding:** The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form.

- Frozen strawberries- Mexico
- Cherry tomatoes- Mexico
- Roma tomatoes- Mexico
- Bell peppers- Canada and Mexico
- Tropical fruit, canned- Thailand
- Mandarin oranges, canned- China

**Corrective Action Needed:** Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A template form is located on the [Buy American Provision](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

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

- Outreach effort for the Summer Food Service Program and School Breakfast Program exceeded expectations
- Opportunities for school breakfast program growth:
  - Consideration of alternate service models like Breakfast in the Classroom (BIC) to boost participation
  - Increasing food service staff/student engagement through training opportunities
  - See DPIs website for marketing & promoting SBPs

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Wisconsin School Day Milk Program**

#### **Commendations and Comments**

- The Laona School District is commended on its correct application of the CEP free claiming percentage to determine the estimated portion of “F/R” milks that can be claimed for the WSDMP. The paid portion was not included in the claim.
- The cost/revenue of milk for paid students does need to be allocated to nonprogram foods and not the WSDMP.

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

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

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



*With School Nutrition Programs!*