

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

School Food Authority: Wabeno School District

Agency Code: 215992

School(s) Reviewed: Wabeno Elementary

Review Date(s): November 13-15, 2017

Date of Exit Conference: Nov 15, 2017

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

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

Applications were organized and available. 136 eligibility determinations were reviewed, one error was identified. Technical assistance was provided to SFA to be sure to include child income listed on the application that is reported by household in determining applications. In the eligibility manual (2017) this can be found on page 29.

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding: There was a finding that there was an error on one of the applications regarding extension of meal benefits. The household was reduced but was found to be free due to an extension of benefits of one of the household members that resides in this household.

Corrective Action Needed: Please make the change of the meal benefit and notify the household of the benefit change. In addition, update the benefit issuance list and the point of service. This will be recorded on the SFA1 form with the date of the correction. This finding was corrected onsite, no further action is required.

Finding: There was a finding that there was bundling of cards with pin numbers used for meal service for the 4k students at the point of service. This is not an acceptable practice.

Corrective Action Needed: Please correct this practice of bundling cards for the point of service and submit a statement on how this will be corrected.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

The SFA did a nice job of tracking the verification process.

Findings and Corrective Action Needed:

Finding: There was a finding that upon review of income documents received by the SFA from the household, which was selected for verification, the SFA used the income listed before Medicare deductions on one of the submitted documents. This is incorrect. The amount that should have been used for verifying is the gross income before deductions. Technical assistance was provided.

Corrective Action Needed: Please review website information regarding verification including the eligibility manual. Please submit a statement of understanding on what income should be used when verifying an application.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

The meal counting and claim for the Review Month was conducted perfectly.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations/Comments/Technical Assistance/Compliance Reminders

New Meal Pattern for 4K Students

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

At Wabeno Elementary School, 4K students eat breakfast in the classroom. Since they are not comingled with other grades at breakfast, they must be offered the new CACFP meal pattern. Technical assistance was given on the major changes between the 4K students' old and new meal patterns. The new CACFP meal pattern does not allow flavored milk and sets limits on the amount of sugar in cereal and yogurt. This means that students may not be offered skim chocolate milk and may only be offered cereal that contains less than 6 grams of sugar per dry ounce and yogurt that contains less than 23 grams of sugar per 6 ounces.

Offer Versus Serve (OVS) is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service.

Since 4K students will be offered a different meal pattern, the menu planner must either use separate production records for 4K or add a column to the existing production records that shows the differences in what is being offered. Based on discussions on-site, a separate production record will likely be used.

At lunch, 4K students are comingled with other grades, so they do *not* need to follow the new CACFP meal pattern at lunch.

If you need further guidance on the new CACFP meal pattern please do not hesitate to reach out to any of the staff on the School Nutrition Team and we will be happy to help answer your questions.

Offer versus Serve

There was some confusion among staff about Offer versus Serve (OVS) requirements, as some students were being asked to take more fruit at breakfast even though they already had ½ cup of fruit on their tray. Under OVS, students must select 3 items at breakfast including ½ cup of fruit. The OVS requirements are different from what students must be offered under the [breakfast meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table.pdf). It is recommended that all staff review the OVS requirements by watching our [Offer versus Serve Webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) and/or our [Get the Scoop on Breakfast: Part 2 \(Offer versus Serve\)](https://dpi.wi.gov/school-nutrition/training/webcasts#sbp) webcast (https://dpi.wi.gov/school-nutrition/training/webcasts#sbp).

Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). A copy of the production record requirements can also be found at that link.

Crediting Pepperoni

The pizza bake recipe included pepperoni, which was being credited towards the meat/meat alternate component because the pepperoni product had a Product Formulation Statement from the manufacturer. However, pepperoni is not creditable in the National School Lunch Program unless it has a child nutrition (CN) label or is included as part of a CN labeled pizza. Traditional dried pepperoni (beef/pork) must be CN Labeled, whether the pepperoni is on pizza or used in another entrée. Products labeled as “pepperoni type” or “pepperoni flavored” are not the traditional dried pepperoni foods; therefore, a manufacturer’s product formulation statement (PFS) is acceptable these types of products. Since the pepperoni does not credit, the recipe as written credits as 1 ounce equivalent (oz eq) meat/meat alternate (M/MA) per serving. Technical assistance was given on crediting the M/MA and grain components in this recipe.

Product Labels

Rather than printing information from a distributor’s website, the nutrition facts labels and ingredient lists from products you serve should be photocopied or photographed from the actual product label. Information found online is not always current or accurate, so it is preferable to keep documentation on file from the actual products you receive.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding:** At breakfast there is a daily alternate entrée option of two granola bars, which credits as 1 oz eq of grain (0.5 oz eq grain each). At lunch there is a daily alternate entrée option of an Uncrustable (crediting as 1 oz eq M/MA and 1 oz eq grain) and a string cheese (1 oz eq of M/MA), for a total of 2 oz eq M/MA and 1 oz eq grain. Each of these alternate entrée options leads to a weekly shortage of grain at their respective meals. The weekly minimum for grain is calculated based on the minimum amount of the component that is offered to students each day. Technical assistance was given on pairing another food item with each alternate entrée to meet the weekly requirements of 8 oz eq grain at breakfast and 8 oz eq grain at lunch. At breakfast, a M/MA (such as 1 oz eq yogurt or string cheese) can be paired with the granola bars since M/MA credits towards the grain component at breakfast. Remember that graham crackers count as a grain-based dessert at lunch. No more than 2 oz eq of grain-based desserts may be offered each week.

Corrective Action Needed: Please submit a written statement explaining what you will add to the menu to fix the weekly shortages at breakfast and lunch. Please submit product information for any new items added to the menu.

❑ **Finding:** The salad bar production record does not have a column for planned portion size. Planned portion sizes are required for every meal component, even in self-service situations. Technical assistance was given on either modifying the current production record to add a column for planned portion size, or switching to a new production record such as the garden bar template found on DPI's [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Corrective Action Needed: Please submit a copy of the new or updated salad bar production record that includes planned portion sizes for each fruit and vegetable.

❑ **Finding:** There was no standardized recipe on file for the breakfast sandwich. Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. 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. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Corrective Action Needed: Please submit a standardized recipe for the breakfast sandwich.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf): <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding:** There was a finding that the SFA does some catering to a Head start program not run by the district. The SFA must break out expenses and revenues regarding the catering into non-program foods for the annual financial report. Technical assistance was provided.

Corrective Action Needed: Please go back into the annual financial report and correct this. SFA was working on this while reviewer was on-site. No further action is needed.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

While Wabeno is non-pricing, moving forward if the district goes to pricing for meals, please review the following information.

- 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, and Food Service operated Vending Machines.
- Revenues received from the sale of those foods must cover all nonprogram food costs including food, labor, equipment, and purchased services. 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>).

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

- 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>).

Adult Meals

- A [Wisconsin Adult Meal Pricing Worksheet](#) 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.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>).

Findings and Corrective Action Needed: Revenue From Nonprogram Foods

❑ Finding: Due to the SFA having non-program foods (Head start catering); there is a requirement to complete a non-program food revenue tool at least once a year. It was found that the non-program revenue tool was not completed. Technical assistance was provided.

Corrective Action Needed: Watch the [Nonprogram Foods Revenue Tool webinar](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html). In addition, please send a completed USDA non-program food revenue tool.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if 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. Information can be found on the USDA website.

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.

Findings and Corrective Action Needed: On-site Monitoring

❑ Finding: The finding was that the SFA did not have knowledge of the breakfast on-site monitoring form or in the past school year completed a breakfast on-site monitoring form.

Corrective Action Needed: Please submit to me a completed copy of the breakfast on-site monitoring form that the SFA will use moving forward.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

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.

Content of the Wellness Policy

At a minimum, the wellness policy must include:

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). LWPs should include specific goals related to:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

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). 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>). Please contact one of our Wellness policy specialist for additional guidance; Kelly Williams at Kelly.williams@dpi.wi.gov or 608-267-9120 or Alicia dill at alicia.dill@pi.wi.gov or 608-266-2741.

Findings and Corrective Action Needed: Local Wellness Policy

□ Finding: The finding showed that there is a wellness policy, but there needs to be updates to the policy to meet USDA requirements. In addition, there needs to be a committee that meets at least once a year to review the wellness policy.

Corrective Action Needed: Language must be added related to the following content areas; School Meals, Smart Snacks, Food & Beverage Marketing, Nutrition Promotion and the Triennial assessment.

Please provide a timeline for updating your policy to become compliant with the final rule. The [Local Wellness Policy Checklist](#) can assist with sample language. In addition, please include in the statement when a wellness committee will be put together and who will be involved in the wellness committee and when will they plan to meet.

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at Wabeno Elementary School. Per discussion with school staff, there may be an upcoming fundraiser during the holiday season in which students purchase cookies for decorating in their classrooms. This would fall under the Smart Snacks rule, and could be considered an exempt fundraiser for an organization. The cookie sale is allowable as long as the cookies are not sold in the food service area during meal service times, and as long as the organization in charge of the sales do not have more than two exempt fundraisers per school year. Food or beverage fundraisers should be tracked to document compliance with the Smart Snacks rule. Please see our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) for more information.

The meals served at Wabeno Elementary School are healthy, varied, colorful, and delicious. The food service director is doing a wonderful job of running the program and clearly cares deeply about school food service. He has sought out training opportunities and has proactively found solutions to problems. Food service staff are friendly and welcoming. Thank you for all your hard work!

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.

- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- 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 their 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>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).

- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- **Annual Training Requirements for All Staff**
 Directors: 12 hours
 Managers: 10 hours
 Other Staff (20 hours or more per week): 6 hours
 Part Time Staff (under 20 hours per week): 4 hours
 If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action Needed: Professional Standards

❑ **Finding:** The finding was that several non-food service staff who have a role in food service need to have a tracking method of training hours. This tracking method has some minimum requirements that need to be included in the document.

Corrective Action Needed: Please submit a tracking tool of non-food service staff involved in the program and their current hours of training, which includes the minimum requirements for the tool.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

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.

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>).

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: Black Olives, canned mushrooms, mixed Fruit. **Technical assistance** was provided regarding completing the non-compliant list for items that are non-domestic. Resources were left on-site.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

All free and reduced price applications, including applications from households with denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

Commendations/Comments/Technical Assistance/Compliance Reminders

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

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](#) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>). **Technical assistance** was provided.

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snack Program

Commendations/Comments/Technical Assistance/Compliance Reminders

Programs that provide care after the school day may be eligible for USDA reimbursement for snacks served to children through age 18. To be eligible for reimbursement, afterschool care programs must meet the criteria below and as outlined in the USDA Question and Answers. Provides educational or enrichment activities in an organized, structured, and supervised environment. Activities must occur after the end of the school day during the school year. In addition, each site participating in the Afterschool Snack Program needs to receive a review within the first four weeks of operation, and a second review within the school year. The review form may be found on our [Afterschool Snack Program](#) webpage (<http://dpi.wi.gov/school-nutrition/after-school>). In addition, Area Eligible Afterschool Snacks are all claimed at the free rate. **Technical assistance** was provided as Wabeno school district could qualify as are eligible if they chose to participate.

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

The Wisconsin School Day Milk Program (WSDMP) was created by the Wisconsin Legislature to reimburse schools for a portion of their costs for serving milk at a milk break to Pre-Kindergarten through Grade 5 students who are eligible for free or reduced price meals. Only one half-pint of milk may be claimed per eligible student per school day. By State law, no charge can be made to those students who qualify for free and reduced price meals and are receiving free milk under the WSDMP. Milk served to paid students at the milk break in Grades PreK through 5, and students in Grades 6-12, is not eligible for reimbursement. If milk served to students is claimed under the federal Special Milk Program (SMP), it may not be claimed under the WSDMP. Per the Agreement, the SFA agrees that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid. **Technical assistance** was provided regarding calculating milk cost for reimbursement.

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

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

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

