

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

---

**School Food Authority:** River Ridge School District  
**School(s) Reviewed:** River Ridge Elementary School

---

**Agency Code:** 224904  
**Review Date(s):** 2/21/19–2/22/19  
**Date of Exit Conference:** 2/22/19

---

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](http://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](http://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 River Ridge School District for the courtesies extended during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to

respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The staff members did an excellent job preparing for the review, and were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the nutrition programs. The food service staff were welcoming, knowledgeable, and clearly dedicated to their work. The cafeteria was inviting and interactions between staff and students during meal times were positive and customer-service focused.

---

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### **Commendations:**

- Of the 185 eligibility determinations reviewed, no errors were identified! Due to the lack of errors, fiscal action will not be assessed for the benefit issuance section and the SFA will not be required to conduct an independent review of applications next year. The determining official does a great job managing student meal benefits and all of the associated details!

##### **Technical Assistance:**

##### Household Communications

- River Ridge does not currently utilize their software system as a means for households to submit an electronic application via the internet. However, the application form is posted on the school website and in the optional newsletter (which is available in print and online). Because the application is accessible online for households to print, complete, and submit, this is considered an “electronic application,” per the USDA definition.
- When an SFA uses an electronic application, there are some options available to reduce paper usage when communicating about free/reduced meal benefit qualification.
  - To inform families about the availability of free and reduced price meals, SFAs must distribute information letters to households of children attending the school before the children begin attending school (page 10 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>). Information letter requirements are detailed on pages 11-13.
  - The DPI SNT “[FAQ About Free and Reduced Price School Meals](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-app-parent-letter-faq-1819.docx)” letter is intended to be the information letter described in the Eligibility Manual (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-app-parent-letter-faq-1819.docx>).
  - This information/FAQ letter must be distributed to all households that are not already certified for free meal benefits via direct certification (DC) prior to the start of the school year. The SFA may choose to send the information/FAQ letter to all households, even if the households are already certified for free benefits via DC. Households certified for free meal benefits via DC prior to the start of the school year do not need to be sent the information/FAQ letter or an application, however they must be sent an appropriate notification of their approval for benefits via DC.
  - The information/FAQ letter can be sent via mail, email, or in student packets (if the packets are given to all students and are not an optional item). If sending electronically, an attachment or link to the full information/FAQ letter is allowable to meet this requirement.
  - When distributing the information/FAQ letter, it must be ensured that all households required to receive the letter do indeed receive it. If utilizing email to distribute the information/FAQ letter, the SFA should have the ability to track any email bounce-backs

- and determine which households do not have email. If email will be the only way the SFA sends out the letter, it would be a best practice to send households without email a paper copy of the information/FAQ letter.
- If mail will be used to distribute the required information/FAQ letter, it may also be advisable to send a paper copy of the application and the [Instructions/How to Apply](#) along with the letter to promote application completion (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-meal-application-instructions-1819.doc.docx>).
  - If the SFA chooses to only send the information/FAQ letter out to households, then the full three-part application packet (including the information/FAQ letter, the application, and the Instructions/How to Apply) should be available online and in paper copies upon request. The application form itself does not need to be physically mailed to each household, but households do need to know how to access the application online and where they can access a paper copy if they do not have the ability to access it online. The information/FAQ letter may need to be modified so that it accurately communicates how households can obtain an application.
  - If the SFA chooses to have the three-part application packet available in hard copy during registration, the packet must be offered in a manner that prevents overt identification of households wishing to apply. For example, it would be acceptable to have the three-part application packet at a table with other registration information. However, it would be unacceptable to have a specific table with only the application packet that is labeled “Free and Reduced Lunch Information.” Household members should be able to obtain application information in a discrete manner.

#### Effective Dates

- Eligibility effective dates are the date an application is approved, the date of the DC run the student matches on, the date a benefit extension is identified, or the date the determining official is notified by the appropriate school official (e.g. homeless liaison or migrant coordinator) that a student is homeless, migrant, runaway, or enrolled in Head Start. Backdating of eligibility is not allowable.
- During the 30 day carryover period, any students identified as eligible to receive a benefit via extension from another household member (e.g. sibling) should have the date of the extension identification as the effective date. Benefit extensions are considered a new eligibility determination for the school year, and thus should be effective prior to the end of carryover if the extension is identified during the carryover period.

#### Direct Certification Classification

- In the software system, it is recommended to accurately code the method for each student’s eligibility establishment. Specifically, it is important to indicate that students eligible via DC extension are coded as “directly certified.” Accurate coding will assist in successful software-assisted selection of applications for verification in upcoming school years.
- When communication with officials from Other Source Categorically Eligible Programs, such as the district’s homeless liaison, establishes eligibility for meal benefits this is considered “direct certification for other source categorically eligible programs.” For example, when the determining official receives emails from the homeless liaison notifying that specific students are homeless and thus eligible for free meals, these students are then considered directly certified and their effective date of eligibility can begin on the day the determining official receives the information. For additional information, reference the Eligibility Manual pages 14-20.

### Limited English Proficiency (LEP)

- The non-profit food service account may be used to pay for translation services for LEP households if there is a need to translate materials in a language that is not currently available through DPI SNT or USDA.

### Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding A:** Prior to the start of the school year, the SFA did not distribute the information/FAQ letter to all households. Application materials were only available at a table during school registration, posted on the school website, and in the optional newsletter that is available online or a hard copy. See technical assistance above for additional details. Additionally, the application information posted on the website and included in the newsletter did not contain the information/FAQ letter—only the application and application instructions were provided.

**Corrective Action:** Submit a detailed, written description of how application materials will be distributed in the next school year. Please be specific regarding who will be responsible for what tasks, when materials will be sent out, how materials will be distributed, and what will be distributed.

---

## Verification

### **Technical Assistance:**

#### Official Roles

- There was confusion over the roles of the confirming and verifying officials in the process. The determining official is responsible for processing submitted applications and determining the benefit the household is eligible for. Before verification activities can begin, a designated confirming official must review each approved application selected for verification to confirm that the initial benefit determination was accurate. The confirming official does not need to double check all applications processed by the determining official—just those selected for verification. After the confirming official confirms the initial determination on the selected applications, then the verifying official may begin the verification process by contacting the household to request supporting documentation. If the confirming official disagrees with the initial determination, then specific procedures must be followed to proceed with verification. All officials must sign and date the application when their duties in the process are complete. Please reference pages 103-104 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) for additional information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

#### Verification Pool

- The pool calculated by the verifying official on the verification worksheets reviewed on-site was different than the number of applications reported in Section 4 of the Verification Collection Report.
- When determining the pool of applications subject to verification, the total number of applications approved as of October 1 should be counted. If an application is approved after October 1, it should not be included in the pool. See pages 98-99 of the Eligibility Manual for additional details.

#### Verification Sample

- The verifying official contacted an excessive amount of households for verification. Several of the communications were rescinded when it was discovered that one household was eligible via carryover without a new 18-19 determination and that one household was directly certified prior to October 1. In the end, two households submitted income information and were verified. This was over-verification, as only one application should have been verified. The issue was discussed with DPI SNT in the fall when the errors occurred during verification.
- After the pool is established, the sample must be determined. The chosen sample size (standard, alternate one, or alternate two) dictates how to select applications. If 3% of applications in the pool

must be selected, then the number of applications approved as of October 1 is multiplied by 0.03 and this number is rounded up to the nearest whole number. This calculation must be done carefully as over-verification and under-verification are incorrect and undesirable. See pages 99-103 of the Eligibility Manual.

- If an application is picked from the pool as of October 1 and the household is directly certified AFTER that time, the application can be verified and no further action from the household is required. The SFA must notify the household they keep their benefit and then must mark on the application that the household was directly certified or attach the direct certification approval letter. If an application is selected from the pool as of October 1 and the household is directly certified BEFORE October 1, then SFA must pick another application to verify because that application should not have been included in the pool in the first place.

#### Assessing Income Information Submitted

- The verifying official accepted income information supporting a student income that lacked necessary detail and appeared to simply show income deposited into a personal account. Documentation showing an account deposit (such as an electronic banking screen shot) is not adequate for income verification, as the source of income may be unclear and a deposit may not represent gross income.
- When assessing income information from households selected for verification, it is important that all incomes reported on the application have adequate supporting documentation. This includes any incomes reported for children. The income information must contain adequate information to determine the amount of income, name of household member, frequency of income, and the date the income was received. The verifying official should follow up with households when submitted information is unclear or lacking detail. See pages 105-109 of the Eligibility Manual for additional information.

#### Verification Collection Report (VCR)

- The VCR contained errors. The number of applications reported in Section 4 did not match the number recorded on the verification tracking worksheets reviewed. Additionally, in the Section 5 results section, one of the verified applications was listed in the incorrect box.

#### Re-Applying after Verification

- Households that have their benefit terminated due to failure to complete verification or as a result of the verification for cause process can reapply for benefits in the same school year. However, in these cases, the household must submit income documentation or proof of participation in an eligible assistance program at the time of reapplication. These are not considered new applications. See page 59 of the Eligibility Manual.

#### Findings and Corrective Action Needed: Verification

- **Finding B:** The verification process for 2018-19 involved several errors throughout the process.

These errors include:

- Improper documentation of the confirmation review by the confirming official and completion of verification by the verifying official
- Incorrect counting of applications for the pool
- Contacting households for verification that were not subject to verification
- Verifying more applications than required (over-verified by one application)
- Incorrect information entered on the verification collection report
- Accepting unclear income documentation for one reported income

**Corrective Action:** The verifying official must complete the verification webcast and complete the corresponding quiz. The time spent completing the webcast may be counted towards professional standards hours. Notify the consultant after the quiz has been completed. Additionally, submit a detailed statement describing how verification will be completed correctly in upcoming school years.

Please be specific regarding how tasks will be delegated, how the pool and sample will be determined, and how errors will be minimized.

---

### **Meal Counting and Claiming**

#### **Commendations:**

- The claims for reimbursement appeared accurate. Appropriate edit checks were used for claim submission. Great job maintaining counting and claiming information!
- Thank you to the claim preparer for patiently working through the process of establishing severe need breakfast eligibility for 2018-19 based on three months of qualifying data. The reorganization of schools and grades this year required a more involved process to qualify for severe need breakfast reimbursement, and the claim preparer did an excellent job working through this process!

#### **Technical Assistance:**

##### **Visiting Students**

- Please note that SFAs may claim visiting students outside of the district in the paid category or the individual's benefit category with documentation, unless they are from a CEP school. In order to ensure the full meal cost is covered when serving visiting students, it is recommended to either charge the student the paid student price and claim in the paid category, or charge the adult meal price and not claim the meal. Simply charging the paid student price but not claiming for reimbursement will likely not cover the entire cost of the meal.

##### **Point of Service for Field Trips**

- Counts used for reimbursement claims must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal. Because field trip meals are claimed for reimbursement, there must be an appropriate POS process in place for serving, counting, and claiming these meals. Counting meals and charging students that ordered meals when the meals leave the kitchen for the field trip is not an acceptable POS. In this method, there is room for error if students order but do not take their meal, end up not going on the trip, get sick or leave prior to the meal, or other such discrepancies.

#### **Findings and Corrective Action Needed: Counting and Claiming**

- ❑ **Finding C:** The current POS system for field trip meals does not meet POS requirements. Currently, student accounts are charged for field trip meals when the meals are taken for the field trip according to which students ordered a meal. Any students that get sick or do not eat their meal are then refunded later. This constitutes a "back out" system of counting and claiming since meals are charged to student accounts before the student takes and eats the meal.

**Corrective Action:** Please modify the field trip POS system so that students are checked off by the accompanying teacher as they take their meal. Completed check off sheets should be returned to food service and used for charging student accounts and claim submission. The [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) can be of assistance in the modification of field trip POS (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). Please submit a written plan detailing how field trip meals will be counted and claimed going forward, including a copy of the check off sheet that will be used at the POS.

---

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

### **Menus, OVS, and Crediting**

## **Commendations:**

- Thank you to the food service director, school nutrition professionals, and staff at River Ridge School District. The time and efforts spent preparing for and participating in the on-site review were much appreciated. All documentation submitted for the week of review was thorough and organized. Staff were receptive to all feedback and asked many great questions. All meals observed on the day of review were reimbursable, showing the hard work the school nutrition professionals put into educating the students on what they may select for both breakfast and lunch. Additionally, it is great that the district continues to scratch cook many menu items for the students. Thank you for all that you do for the students of River Ridge School District!

## **Technical Assistance:**

### Grade Groups and Menu Planning

- Although only the elementary was reviewed as part of this administrative review, it was noted that meals are planned and served based on two grade groupings: 4K-4th grade and 5-12th grade. There are different meal pattern requirements for students in these grades, meaning not all students in grades 5-12 can follow the same meal pattern. As discussed during the on-site review, consider using the K-12 meal pattern at breakfast and the K-8 and 9-12 meal patterns at lunch. This will simplify menu planning and service. As long as the 4K students continue to eat meals with the older students, they may be served the K-12 and K-8 meal patterns.
- Please review the [Lunch Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) and [Breakfast Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf) tables for the specific quantity requirements and dietary specifications (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf).

### Production Records

- The production records submitted for the week of review are overall thorough and are clearly used to aid the menu planner and staff before, during, and after meal service. A few items on the production records could be improved.
  - More specific information for menu items could be added, such as the brand, product number, or recipe number.
  - All items must have a planned serving size, including condiments and salad bar items. This was discussed during the on-site review and a modified a salad bar template was provided.
  - Planned serving sizes cannot be a range.
  - Technical assistance was provided on including planned versus actual numbers for number of servings and quantity when they vary.
  - Either the number of servings prepared or quantity (in purchase units) prepared is being recorded. Both the number of servings and quantity prepared must be recorded for all menu items. Consider adding a column to the current production record template or begin using a new template.
  - Both types of toast and the corresponding usage should be recorded separately at breakfast. The same should be done for both the regular and sweet potato fries at lunch.
- A list of production record requirements (“[Must Haves and Nice to Haves](#)”) and sample production record templates can be found on the [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).

### Crediting Discrepancies

- The production records and standardized recipes submitted for the week of review contained a few crediting discrepancies.
  - The Breakfast Cake credits as 0.75 oz eq grain, but was listed as 2 oz eq grain on the production record and recipe.

- Two sausage links credit as 1 oz eq M/MA, per the CN label provided. These were listed as 0.75 oz eq M/MA on the breakfast production record and 0.5 oz eq M/MA on the lunch production record.
- The breading on the chicken patty credits as 1 oz eq grain, but was listed as 0.5 oz eq grain on the production record.
- The crediting for the red/orange vegetables included in the Spaghetti Meat Sauce should be written on the production record as  $\frac{1}{8}$  cup, not 0.18 cup.
- A 1.75 oz serving of the Teriyaki Chicken credits as 1.25 oz eq M/MA, but was listed as 1.5 oz eq M/MA on the production record.
- A 1.5 oz serving of the Orange Chicken credits as 1 oz eq M/MA, but was listed as 1.5 oz eq M/MA on the production record.
- A  $\frac{1}{2}$  cup serving of the steamed rice credits as 1 oz eq grain, but was written as 0.5 oz eq grain on the production record.

#### Crediting Grains using Exhibit A

- Grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). Exhibit A is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1.0 oz eq for each specific group. Exhibit A groups all grain products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:
  - Group A: these products are hard and crunchy, dry and lightweight. Per ounce, they contain a good deal of grain.
  - Group B: whether serving bagels, pizza crusts or tortillas, 1.0 ounce of these products all credit the same towards the meal pattern (1.0 ounce by weight = 1.0 oz eq grain).
  - Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1.0 ounce of pancake does not credit as 1.0 oz eq like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz eq grain.
- If a product is not listed in Exhibit A, a signed Product Formulation Statement (PFS) must be obtained from the manufacturer that lists the *grams of creditable grain* in the product. Divide this number by 16 grams per ounce equivalent to calculate the grain contribution for that product.
- There may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS, rather than use Exhibit A.

#### Salad Bar Serving Sizes and Signage

- Produce on a garden bar can credit toward the meal pattern each day that it is offered to students. Even with garden bars, the menu planner must plan a specific portion size that he or she intends students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least  $\frac{1}{8}$  cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as  $\frac{1}{2}$  of the volume served.
- The School Nutrition Team (SNT) has a [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) with pictures that can be posted on a salad or garden bar (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

#### Milk Recipe

- If it becomes too time- or labor-intensive to record milk usage by type on production records, consider using a [Milk Recipe](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc>). A milk recipe is documentation of average milk usage by meal (breakfast



or lunch) and grade group. When a milk recipe is on file, total milk usage must still be recorded on production records.

- Milk recipes must be updated twice per year or when it is noticed that students' preferences have changed.
- This process may also be used to develop a cereal recipe and a juice recipe for breakfast service.

#### Breakfast Participation and Service Models

- Breakfast Participation in the River Ridge School District is low, in comparison to the lunch participation rates. Consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break to help increase student participation. Breakfast in the Classroom works well for elementary students and mid-morning models work well in middle or high school students where they have a passing time to grab a meal between classes. This could be set up in the cafeteria or on mobile carts in the hallways.
- Breakfast in the classroom is associated with the highest participation rates, which can be as high as 98 percent of the school's enrollment. Other service methods, such as Grab 'n Go and breakfast after first period, correlate with increases as much as 15 to 40 percent of current participation. If breakfast is offered in a convenient way for students, they may be more likely to participate in the program. Additionally, greater participation equates to more students being ready to learn, as well as higher levels of government reimbursement, which results in increased revenue to the non-profit food service account.
- The [Breakfast Resources](#) webpage contains a wealth of information about the different breakfast service and financial models (<https://dpi.wi.gov/school-nutrition/school-breakfastprogram/resources>). For questions on breakfast models or ideas to increase participation, contact the School Breakfast Program Specialists (DPISBP@dpi.wi.gov).

#### Wisconsin Team Nutrition Workshop

- The food service director is encouraged to attend Wisconsin Team Nutrition's Teaming Up to Increase Participation workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria, while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training](#) webpage ([dpi.wi.gov/school-nutrition/training/increase-participation-workshop](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop)).

#### Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding D:** The Breakfast Cake offered at breakfast during the week of review requires multiple corrections.
  1. The Breakfast Cake was incorrectly credited as 2 oz eq grain on the recipe and on the production record. Using the standardized recipe submitted, this item credits as 0.75 oz eq grain. All grade groups must be offered at least 1 oz eq grain daily at breakfast. This resulted in a daily grain shortage at breakfast.
  2. Since the Breakfast Cake did not meet the minimum requirement to offer at least 1 oz eq grain daily at breakfast, the 1 oz eq M/MA (yogurt) offered with the Breakfast Cake cannot be credited toward the grain component.
  3. This item is not whole grain-rich (see Finding E below).
  4. According the superscripts included on Exhibit A, cake is not an allowable grain at breakfast. Based on the recipe and conversation with the food service director, it was

determined that this item was originally a coffee cake, but the “coffee” was dropped from the name due to student confusion over the ingredients.

**Corrective Action:** Submit an updated standardized recipe for the Breakfast Cake showing that it credits as at least 1 oz eq grain and is whole grain-rich. Additionally, the name of this menu item should be changed to more accurately portray the product as an allowable breakfast grain.

❑ **Finding E:** Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning 50% or more of the product needs to be whole grain. The cavatappi pasta, steamed rice, and breakfast cake offered during the week of review were not whole grain-rich.

**Corrective Action:** Find new, whole grain-rich versions of these products and submit nutrition facts labels, ingredient lists, and recipes, if applicable.

As discussed during the on-site review, non-whole grain-rich items may be offered as extras, as long as doing so fits within the dietary specifications. If any of the above items will be offered as an extra, submit a statement explaining how the daily and weekly grain requirements will be met by using other grain products. Submit nutrition facts labels, ingredient lists and recipes, if applicable.

Corrective action needed for the Breakfast Cake may be satisfied with the response for Finding D above.

Through SY 2018-19, USDA is requiring all grains to be whole grain-rich (50% whole grain). The [updated final rule](https://www.fns.usda.gov/school-meals/fr-113017) takes effect SY 2019-20. Beginning SY19 only half of the grains served must be whole-grain rich (<https://www.fns.usda.gov/school-meals/fr-113017>). While 50% of all grains are allowed to be non- whole grain-rich (i.e., enriched), this may undermine the progress made in the past few years in teaching students to accept whole grain-rich products.

❑ **Finding F:** 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 the specific 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.

The following menu items offered during the week of review require standardized recipes:

- Toast offered at breakfast
- Cinnamon Toast offered at breakfast
- Peanut Butter Sandwich offered at lunch

The Spaghetti Meat Sauce recipe submitted for the week of review contained errors. The cooked temperature must be updated to 155° F, per the Wisconsin Food Code when using raw ground beef. The crediting for the ¼ cup serving size should be corrected to 1 oz eq M/MA. The total yield, crediting, and procedures will change if using part raw ground beef and part pre-cooked beef crumbles, as noted as an option on the recipe. A second recipe should be created for this mixture.

**Corrective Action:** Submit recipes for the two varieties of toast and the Peanut Butter Sandwich. Submit a corrected recipe for the Spaghetti Meat Sauce (using the raw ground beef).

✓ **Finding G:** There were no planned serving sizes on the salad bar production record submitted for the week of review. All items offered as part of a reimbursable meal must have a planned serving size. Additionally, the salad bar production record was completed weekly instead of daily.

**Corrective Action:** The planned serving sizes were discussed and documented during the on-site review. A modified salad bar production record was provided by the reviewer. Since the same salad bar

is offered daily, the vegetables were able to be credited toward the respective subgroups for the week of review. *Corrected; no further action required.*

---

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### Technical Assistance:

##### Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program. The [Annual Financial Report instructions](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other.” Only expenses for edible food items and beverages should be reported under “Food.”
  - “Equipment” should reflect major purchases of equipment costing over \$5000 per unit. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other.”
  - Under “Purchases Services” report any time someone is paid for services provided such as equipment repair and health inspections.
  - Under “non-program foods,” report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.

##### Negative Food Service Account

- The non-profit food service account has been operating “in the red” for several years thus requiring an annual fund transfer. Below are suggestions for increasing the balance of the food service account:
  - Increase meal prices for students and/or adults. Some of the meal selling prices are low compared to other districts, particularly at the elementary level. It is recommended to assess the cost of producing breakfasts and lunches and adjust meal prices accordingly. Some of the meal prices may not be set high enough to cover the cost of producing the meal. Assessing selling prices for a la carte vending machine prices may also be beneficial.
  - Examine strategies to increase the meals per labor hour to ensure efficient use of resources. The Budgeting and Cost Control section of the [Financial Management webpage](#) contains resources that can aid in this assessment (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
  - Explore strategies to increase breakfast and lunch participation:
    - Conducting a survey of the student body may be a good starting point for targeting changes that can be made to increase participation.
    - Run fun promotions in the cafeteria for different occasions. The [Team Nutrition webpage](#) has ideas and resources for promoting the programs (<https://dpi.wi.gov/team-nutrition>).
    - Consider [alternative breakfast models](#) to increase breakfast participation (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>). Breakfast participation at River Ridge is very low compared to lunch. Targeting breakfast and working to increase participation could be a way to significantly

increase revenue, particularly because all schools receive severe need reimbursement for breakfasts served to free/reduced eligible students.

### **Unpaid Meal Charges**

- The SFA is compliant with unpaid meal charge policy requirements. As the SFA continues to develop and modify unpaid meal procedures, it may be beneficial to review [USDA's Overcoming the Unpaid Meal Challenge](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-29-2017a2.pdf) resource (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-29-2017a2.pdf). This resource contains guidance on regulations, best practices, and suggestions from other SFAs.

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

❑ **Finding H:** The total revenues and expenditures reported on the Annual Financial Report (AFR) do not match the totals reported on the school finance PI-1505 report. This discrepancy between the AFR and PI-1505 must be investigated, as the Fund 50 totals should match between reports.

**Corrective Action:** Investigate the discrepancy between the AFR and PI-1505. Manually make any necessary corrections on a printed version of the AFR. Submit the manually updated report to the consultant via email.

---

### **Revenue from Non-Program Foods**

#### **Technical Assistance:**

#### **Non-Program Food Revenue Requirements**

- Non-program foods include: adult meals, a la carte, extra entrees, extra milk (for cold lunch or milk purchased at milk break), vended meals (meals sold to other agencies), catering, and food service operated vending machines. Since non-program foods include adult meals and extra milk, these expenses and revenues must be separated from program foods.
- All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Non-program food costs and revenues must be separated from program food costs and revenues.
- The USDA Non-Program Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) 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).

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

#### **Resources**

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

### **Findings and Corrective Action Needed: Non-Program Foods Revenue**

- ❑ **Finding I:** The Non-Program Foods Revenue Tool has not been completed for the current school year. The SFA sells extra milk at meals, milks at milk break, adult meals, and Smart Snacks items in a food service-run vending machine.

**Corrective Action Needed:** Watch the [Nonprogram Foods Revenue Tool webinar](#) to establish foundational knowledge on the topic. Complete either the [DPI tool](#) using a reference period of at least five consecutive school days or the [USDA tool](#) using annual data (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>; [https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr\\_tool.xls](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls)). Submit the completed tool to consultant. After tool completion and submission, the SFA and consultant will collaborate on any suggested changes to non-program food procedures and pricing to ensure compliance.

- ❑ **Finding J:** Non-reimbursable alternate meals are offered to students with negative account balances of specific amounts designated in the unpaid meal charge policy. These alternate meals are given out infrequently, however when they are served they are given to the student free of charge. These meals are outside of the reimbursable meal and thus are considered non-program foods and must be covered by a non-federal funding source.

**Corrective Action:** Develop a process to track alternate meals served in accordance with the unpaid meal charge policy. Submit a statement describing how the alternate meals given free to students will be tracked and accounted for. At the end of the school year, a transfer must be made from the school account to the food service account to cover the cost of serving these free alternate meals.

- When food service is running in the negative and the school’s fund is already absorbing these losses, there is no separate transfer that needs to be made for these alternate meals since the school fund is already covering program losses that exceed the cost of the alternate meals served. On the Annual Financial Report, a portion of the amount listed under Revenues as an Operating Transfer from Non-Food Service Account should be broken out and classified as a Non-Program Food Revenue Transfer from the Non-Food Service Account. Please note that an additional transfer for the amount of the alternate meals would not actually be made since this amount would already be covered by the school fund transfer
- When the food service account is running in the positive (if this ever occurs in the future), a transfer would need to be made monthly or annually from the school fund to Fund 50 for the total cost of serving the alternate meals for free to students.

---

#### 4. GENERAL PROGRAM COMPLIANCE

##### Civil Rights

###### **Technical Assistance:**

###### Non-Discrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus or low balance notices, the shortened statement may be used, “**This institution is an equal opportunity provider.**”
- Either of these statements must be in the same size font as the other text in the document. The format of the full statement must not be altered in anyway—including by modifying the spacing of the content.

Civil Rights Compliance Self-Evaluation Form (PI-1441)

- The SFA did not complete the PI-1441 fully or by the established deadline. This evaluation form should be completed by October 31 annually. This evaluation does not get submitted to DPI, but should be retained at the SFA for self-evaluation purposes and for future reviews.

#### Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- 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 or the state agency within 5 days. This should be included in the district procedures to ensure compliance.
- 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 an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. 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).
- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](https://fns-prod.azureedge.net/sites/default/files/113-1.pdf) resource (https://fns-prod.azureedge.net/sites/default/files/113-1.pdf).

#### And Justice For All Poster

- The *And Justice For All* poster must be displayed in a prominent location and be visible to program participants. The poster should not be behind the serving line or in a location otherwise deeming it unreadable by program participants. The poster displayed was posted well above student eye level. The food service director was responsive to the relocation suggestion and moved the poster to a lower spot during the on-site visit.

#### Special Dietary Needs

- The only special dietary need the SFA is currently accommodating is offering a DPI-approved soy milk to a student that cannot drink milk. While the SFA is not currently accommodating any other special dietary needs, it is important to note and become familiar with the pertinent regulations for possible accommodations in the future.
- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>).
- If accommodations will be made in the future based on signed medical statements, the food service director should receive and retain copies of the signed statements submitted by the household. It is crucial that the food service director be able to easily access the exact accommodation request so that it can be implemented correctly and safely according to the medical practitioner's directions.
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the

USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

- Juice or water may not be substituted for fluid milk unless juice or water is specified as a substitution on a medical statement signed by a licensed medical practitioner. An SFA may choose to offer lactose-free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA without a medical statement. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

### **Findings and Corrective Action Needed: Civil Rights**

- ✓ **Finding K:** The Civil Rights Self-Compliance PI-1441 form was not fully completed for the 18-19 school year. The form was completed late and did not have the bottom section filled out. This form must be completed annually by October 31<sup>st</sup> and retained by the SFA.

**Corrective Action:** Complete the [PI-1441 form](#) for the current school year (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>). Submit a copy of completed form to the consultant. Provide a statement describing how this form will be completed by the deadline annually, including a designation of which person will be responsible for completion. *Corrected; no further action required.*

- ❑ **Finding L:** The application denial/approval letter does not contain the full, correctly formatted non-discrimination statement. The statement on the letters has modified formatting, which is unallowable. Additionally, the low balance reminder letter contains an incorrectly formatted full non-discrimination statement. On the low balance reminder, the full statement must be formatted correctly or the correct shortened statement could be used.

**Correction Action:** Because the SFA does not have the ability to modify the software-generated template letters, the SFA must contact the software vendor to request this modification to the letters. Submit copies of the communications with the vendor to show that the request was made.

- ✓ **Finding M:** The menus posted online and printed for display around the school do not contain the correct shortened non-discrimination statement. The statement should read, "This institution is an equal opportunity provider."

**Corrective Action:** Work with the appropriate school staff person to get the statement on the menus updated so the correct shortened version is included. Submit a copy of the updated menu or a link to the updated online menu. *Corrected; no further action required.*

---

### **On-site Monitoring**

#### **Technical Assistance:**

- While the SFA operates three school sites according to the online contract, all school sites are located in the same building. The food service director has direct daily oversight for all sites and therefore on-site monitoring is not required. The director may choose to complete the on-site monitoring forms as desired if it will help maintain program oversight.

---

### **Local Wellness Policy (LWP)**

#### **Commendations:**

- The SFA has a committee of representatives that is responsible for planning and implementing wellness activities in the district. Great job creating opportunities for students, staff, and families to explore different areas of wellness!

#### **Technical Assistance:**

##### Documentation

- Documentation pertaining to the LWP should be kept on file in the SFA to show that requirements are being met. This includes a roster of stakeholders involved in the LWP development/implementation/revision, records of when and how the policy is revised, where the policy is available publicly, how potential stakeholders are notified of their ability to participate in the LWP, and any information pertaining to the assessment of the policy.

##### Wellness Committee

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. While the SFA does have a committee that plans and implements wellness activities, this committee currently does not have the opportunity to provide input on the policy itself. It is recommended to involve the established wellness committee in policy content updates.

##### Content of the Wellness Policy

- 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 policy (LWP) requirements. At a minimum the wellness policy must include:
  - 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).

##### Triennial Assessment



- 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 the 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 webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (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).
- Additionally, the SFA is required to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

#### **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). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.

#### **Findings and Corrective Action Needed: Local Wellness Policy**

- ❑ **Finding N:** The local wellness policy (LWP) does not contain required language pertaining to food/beverage marketing or the triennial assessment. Additionally, the nutrition education and nutrition promotion content could be improved upon. It is recommended to review the resources on the Wellness Policy webpage to assist in improvements. Of particular interest may be the [Local Wellness Policy Builder in PDF](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-online-builder-full-text.pdf) format and the [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-online-builder-full-text.pdf; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf).

**Correction Action:** Submit a timeline for updating the policy to become compliant with the final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule.

### **Smart Snacks in Schools**

#### **Technical Assistance:**

- 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. The school day is considered the period from the midnight before to 30 minutes after the end of the instructional school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption.
- There are two situations by which an organization may sell foods and beverages to students during the school day.
  1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
    - a. These foods or beverages may be sold at any time and in any location.

- b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards:
    - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
    - b. Exempt fundraisers cannot occur in the meal service area during meal times.
    - c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, ensuring that no organization has more than two fundraisers, and that each fundraiser is not more than two consecutive weeks. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times.
  - Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.
  - The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed. School food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy, if they are consistent with federal requirements.
  - If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group.
  - Accompaniments or dips need to be included in the nutritional analysis of foods sold a la carte. This may be assessed by determining the average amount each student uses, or by planning for a specific amount to go with each food item sold. The calories, sodium, fat, and sugar of the food plus the accompaniment need to be added together when determining whether the food meets the Smart Snacks guidelines. The Alliance for a Healthier Generation's [Smart Snacks Product Calculator](#) or DPI's Smart Snacks Recipe Analyzer Tool (found at the top of the [Smart Snacks webpage](#)) may be used to determine whether products are compliant (<https://foodplanner.healthiergeneration.org/calculator/>). If they are, a reference sheet can be printed directly from the calculator website or an electronic or printed copy of the recipe analyzer tool may be kept on file as recordkeeping documentation.

**Findings and Corrective Action Needed: Smart Snacks**

- ❑ **Finding O:** High school students hold a weekly donut sale during the school day. This sale of non-compliant donuts needs to either follow the fundraiser 2-week limit per student organization, per school, per school year, or be discontinued. Please note there *are* Smart Snack-compliant products that student groups sell – perhaps a viable solution if this is to continue.

**Corrective Action:** Submit a summary outlining who will be responsible for oversight of Smart Snack regulations within River Ridge School District. Include examples of education provided to all involved

with the sale of food and beverage items in the school district and include details as to how various groups will ensure compliance with these regulations. Additionally, please address how current food and beverages not meeting Smart Snack standards will be made to comply with these regulations. Use the [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) to review the guidelines (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf).

❑ **Finding P:** The vending machine located in the high school hallway sells many foods that do not meet the Smart Snacks standards and is available for student purchases during the school day.

**Corrective Action:** Corrective action for this finding may be submitted with the corrective action for the Finding O above.

---

### Professional Standards

#### **Technical Assistance:**

##### Food Service Director Designation

- There was some confusion regarding the food service director designation. The person listed as the director on the online contract is referred to as the “head cook” and was categorized as a manager on review materials. While on-site, it was discussed that the “head cook” is considered the food service director for DPI purposes which means that 12 hours of annual professional standards training is required. Minimum hiring standards for directors apply to directors hired after 7/1/15, which does not apply to the current River Ridge director whose hire date is prior to 7/1/15. Every SFA must have a person designated as the food service director.

##### Two Year Flexibility

- SFAs may utilize the two year flexibility offered by the state agency for professional standards training. The SFA may define a two year period and allow staff members to complete twice their annual training hour requirements over two years. For example, a full time staff member could complete 12 hours of training over the defined two year period as opposed to completing six hours every year. This option does not require additional approval from the state agency.

#### **Findings and Corrective Action Needed: Professional Standards**

- ❑ **Finding Q:** The financial secretary is responsible for claim submission, determining and verifying official duties, and authorized representative responsibilities. These roles classify this person as a part-time “non-nutrition staff member with job duties pertaining to school nutrition programs,” and therefore four hours of professional standards training are required annually. The financial secretary may have completed some training during the current school year, however this training has not been tracked.

**Corrective Action:** Submit a training tracker for the financial secretary to reflect training hours completed thus far during the current school year. Civil rights training may be included as part of the required four hours. The [DPI training tracker](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) can be used if desired (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx).

---

### Food Safety

#### **Technical Assistance:**

##### Vending Machine SOP

- Because the SFA has a food-service operated vending machine, the food safety plan should include an SOP for the vending machine. The vending machine contains some time/temperature control for safety (TCS) foods, and thus close monitoring of temperature and expiration dates must occur. It is

strongly recommended to begin documenting the daily temperature of the vending machine, just like how the other cold-holding units (such as milk coolers) are monitored. DPI currently does not have a vending machine SOP template, therefore the SFA may need to create its own SOP or conduct research to find a similar existing one.

#### Food Safety Plans

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria including on field trips.
- It is encouraged that the food service director continue modifying and updating the SOPs in the food safety plan as processes change and as the SOPs can be made more specific to actual practices occurring in the operation.

#### Second Servings of Fruits/Vegetables

- During lunch service, it was observed that some students returned to the garden/salad bar for additional servings of fruits and vegetables (which is allowable). However, students going up for seconds served their portions onto their soiled trays. Clean trays or disposable single-use containers (i.e. portion boats) should be used for second servings at the garden bar. Using soiled trays for seconds poses a contamination risk. Serving utensils at the bar could touch the student's dirty tray and introduce pathogens into food items on the bar. Consider how students and staff could be educated on safe procedures for getting seconds from the garden bar. Signage or portion boats may be needed to ensure contamination risk is reduced. Please reference section 3-304.16 of the [Wisconsin Food Code](http://docs.legis.wisconsin.gov/code/admin_code/atcp/055/75_.pdf) ([http://docs.legis.wisconsin.gov/code/admin\\_code/atcp/055/75\\_.pdf](http://docs.legis.wisconsin.gov/code/admin_code/atcp/055/75_.pdf)).

#### Sharing Tables

- The food service director inquired about the processes involved in starting a sharing or "no thank you" table. Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.
- A sharing table 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.
- A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, a designated worker or trained individual must inspect the items for wholesomeness.

- Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.
- Considerations
  1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
  2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
  3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
  4. Parents will be informed in writing.
  5. The food safety plan for the specific serving locations where sharing or no thank you 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.
  6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
  7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
  8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).
- Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. “Wholesome” must be defined by the SFA as part of the SOP. **Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.** Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.
- Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

#### **Findings and Corrective Action Needed: Food Safety**

- ❑ **Finding R:** Reimbursable field trip meals are offered, however there was not a corresponding standard operating procedure (SOP) in the school’s food safety plan detailing the food safety practices for field trip meals. Additionally, ice-lined milk barrels are utilized at breakfast and lunch service without a corresponding SOP. Milk left in the barrels at the end of service is saved for future service without temperature monitoring prior to return to the cooler, which is not an acceptable practice.

**Correction Action:** Submit an SOP for field trip meals to reflect site-specific procedures including food handling, storing, transporting, and the leftover food procedure. A [template field trip SOP](#) which can be modified to be site-specific is available on the [food safety webpage](https://dpi.wi.gov/school-) (<https://dpi.wi.gov/school->

nutrition/food-safety#templates). Submit an SOP for milk barrels to reflect the site-specific procedures. There is a [template Milk Barrels Monitoring Temperature Option SOP](#) on the food safety webpage which can be modified, adopted, and implemented (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-barrel-temperature.docx>). This SOP also contains a sample temperature log that can be used to monitor milk temperatures. The SOPs should be added to food safety plan.

- ✓ **Finding S:** The most recent food safety inspection report was not posted in a publicly visible location. The report was only posted in the kitchen behind the serving line where it was only accessible to kitchen staff.

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

---

## **Buy American**

### **Technical Assistance:**

- 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.
  - The following products may be exceptions to Buy American provisions: pineapples, 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.
  - The label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the 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.
  - Any non-domestic product delivered to the school, without the prior, written approval of the food service director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.

- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- For domestic products without country of origin labeling (COOL), consider the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>). More information on this new requirement 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: Buy American**

- ✓ **Finding T:** The following products were identified in the SFA’s storage area as non-domestic and not documented:
  - Trio Poultry Gravy (Canada)
  - Canned Black Olives (Spain)

**Corrective Action:** Complete and submit a Non-Compliant Product Form for the products listed above. *Corrected on-site; no further action required.*

The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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>).

