

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

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**School Food Authority: Brodhead School District**

**Agency Code: 230700**

**School(s) Reviewed: Brodhead Middle (NSLP) and Ronald R Albrecht (SBP/SMP/Afterschool Snack)**

**Review Date(s): April 10-12, 2018**

**Date of Exit Conference: 4/15/18**

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

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

**General Program Reminders/Updates:**

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

## Appreciation/Commendations/Noteworthy Initiatives:

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

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

222 eligibility determinations were reviewed, 3 errors were identified.

##### Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.

##### Annual Income

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

##### Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically. If done through software, please check that the income levels are updated each year after July 1.

##### Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

##### Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

### Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.

### Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

### Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need)
  - Major employers contemplating or experiencing large layoffs
  - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

### Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](#) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

### Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.

- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

### Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

### Disclosure

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

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

- ❑ **Finding #1:** There was one application that listed zero income.  
**Corrective Action Needed:** If zero income is listed, a follow up is required to ensure all income is listed, a household cannot live off zero income. Please follow up with the household to discuss any income sources (disability, social security, child support payments) and re-determine eligibility with any updates.
- ❑ **Finding #2:** The public release was published in the local newspaper, but that was the only place it was sent.  
**Corrective Action Needed:** Please provide the names of a grassroots organization or local unemployment office that it could also be sent to in the next school year.

- ❑ **Finding #3:** Households are not always notified after matching on a direct certification run.  
**Corrective Action needed:** Provide a statement of understanding that all households are required to get the DC notification letter once they match on direct certification, at any point in the school year.
- ❑ **Finding #4:** The nondiscrimination statement was modified on each of the notification letters sent to households, as well as the public release.  
**Corrective Action needed:** Update all of the notification letters with the full current nondiscrimination statement, use the same font size as the majority of the letter and don't modify the formatting. Provide an example of an updated letter.
- ❑ **Finding #5:** There are 14 individuals who have access to the food service module within Skyward which includes free and reduced eligibility information.  
**Corrective Action needed:** Review the list of people who currently have access to the system and ensure that only those who have a legitimate "need to know" have access. This should be limited to as few people as possible. Please provide your plan for reviewing these individuals and ensuring that only those with a need to know have access.
- ❑ **Finding #6:** There was no documentation on file for students who were designated as homeless as confirmation from the homeless liaison.  
**Corrective Action needed:** Provide a statement of understanding that any student determined as homeless, whether indicated themselves on an application or communicated by the homeless liaison, written confirmation prior to notifying the household is required from the homeless liaison and needs to be maintained on file.

## Verification

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- Any application that is provided with a case number and the students also show up on direct certification, are reported as direct certification. Do not include these applications in the verification collection report, but include as direct certification. This may decrease the number of applications to select for verification.
- Work with Skyward to see if they have a verification process that can assist with the selection of applications and reporting for verification.
- To ensure all steps are completed for verification, there is a [verification tracking tool](#) on our website that you are strongly encouraged to utilize.

### Findings and Corrective Action Needed: Verification

- ❑ **Finding#1:** Based on the number of applications reported on the verification collection report three applications should have been verified. Always round up to determine the number of applications to verify.  
**Corrective Action Needed:** Please provide a statement of understanding on how to correctly determine the number of applications to verify (always round up).
- ❑ **Finding#2:** There was one application selected for verification that did not respond. The SFA is required to make one follow up attempt to reach the household, which did not occur.  
**Corrective Action Needed:** Provide a statement of understanding that a follow up email or phone call is necessary for any household that is not responsive to the documentation request and to document when and how this occurs.
- ❑ **Finding#3:** The household that did not respond to verification correctly received communication that their eligibility status would be changed to paid, but this change did not occur in the software system and they continued to receive the same benefit.  
**Corrective Action Needed:** Send a notice of adverse action to the household and notify them that their eligibility will be changed to paid due to a nonresponse to verification and change this in the software 10 operating days after the date of the letter. Please provide the date the letter was sent.
- ❑ **Finding#4:** A confirmation review was not conducted prior to verification.  
**Corrective Action Needed:** Provide a statement of understanding that a confirmation review is required prior to notifying the household of selection for verification.

## **Meal Counting and Claiming**

### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- The meal counting and claim for the Review Month was conducted correctly.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission. This is Accuclaim in the Skyward system. DO NOT use the participation report for the claim submission.
- Work with Skyward to disallow a second meal from being claimed for reimbursement. After the first reimbursable meal is purchased, all additional food purchases are treated as smart snack/ala carte items.

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

### **Commendations and Appreciations**

Sincere thanks to the acting Food Service Director and school nutrition professionals of Brodhead School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. School nutrition professionals at the middle school kept pace through rapid lunch meal services. They

acknowledged students by name, offered greetings and suggestions, and gently reminded students to select fruits and vegetables or to bring funds for their accounts. During breakfast meal service at Albrecht Elementary, the school nutrition professionals provided a hot entrée, chilled fruits and juice, and cold milk. Demonstrated meal pattern, menu planning, and food safety knowledge was commendable. The acting Food Service Director expressed interest in improving and growing current school meal programs. She also asked questions reflective of her understanding of program requirements. All school nutrition professionals care deeply about the child nutrition programs and for the students they serve.

### **Technical Assistance and Program Requirement Reminders**

#### **Non-Reimbursable Meals**

Two students at Brodhead Middle School selected non-reimbursable meals during lunch meal observation on April 10. Students' meals contained insufficient quantities of fruits and vegetables, and students declined to return to the meal service line for additional fruits and vegetables when prompted by the Public Health Nutritionist. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

Strawberries offered during the onsite review were pre-portioned into 4 fluid ounce (fl oz) cups. However, many cups were not full and therefore provided less than 1/2 cup of fruit. In order to ensure a 1/2 cup serving is provided, cups must be filled to the brim. Consider using a 4.5 fl oz or 5 fl oz cup to more easily portion and serve the necessary amount of strawberries and other fruits.

#### **School Breakfast Program**

An item at breakfast is defined as 1.0 ounce equivalent (oz eq) grain, 1.0 oz eq meat/meat alternate (m/ma), 1/2 cup of fruit and/or vegetable, or 1 cup of milk. Under Offer Versus Serve (OVS), four food items must be offered at breakfast, and students must select at least three food items, including 1/2 cup fruit, vegetable, or combination, to have a reimbursable meal.

Nabisco graham crackers offered on the breakfast menu credit as less than 1.0 oz eq of grain. They must be bundled with other items so at least 1.0 oz eq of grain is offered each day to meet the daily minimum requirement for grain, and so these items can be counted as an item for the breakfast meal pattern.

Grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) of the *USDA Food Buying Guide* (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). If a product is not on Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the *grams of creditable grain* in the product. Divide this number by 16 grams per oz eq to calculate the grain contribution for that product.

#### **Recipes Breakfast Items**

If it becomes too time- or labor-intensive to record breakfast item (e.g. cereal, juice, muffin, etc.) usage by type on production records, consider using recipes. Individual recipes document average breakfast item usage by meal and grade group. When a breakfast item recipe is on file, total usage must still be recorded on production records. Recipes must be updated twice per year or when students' preferences change.

#### **Offer versus Serve**

All five components are equally important to a reimbursable meal. Under Offer versus Serve (OVS), a student must select three of five components offered at lunch, including 1/2 cup fruit and or vegetable, as part of his or her reimbursable meal. He or she may decline the entrée, which is often the grain and/or

m/ma component, in favor of fruit, vegetables, and milk. The goals of OVS are to reduce food waste and to permit students to choose the foods they want to eat.

The February 2018 breakfast and lunch menus list choices between fruit OR juice at breakfast and between two vegetables (e.g. baked beans OR asparagus) at lunch. USDA meal patterns for the K-5 and 6-8 age/grad groups require a minimum of 1 cup of fruit to be offered at breakfast, and 3/4 cup of vegetables to be offered at lunch. If the planned portion size is 1/2 cup, consistent with the planned portion sizes on submitted production records, then these choices are not allowable. The word OR limits the student to 1/2 cup of fruit at breakfast, and to 1/2 cup of vegetable at lunch; these amounts do not meet the daily minimum requirements. Discussion with the acting Food Service Director and school nutrition professionals contradicted the menus. Students are not limited to one fruit, juice, or vegetable choice at breakfast or lunch, as applicable. The acting Food Service Director agreed to change the word OR to the word AND on the menu.

### **Production Records**

Crediting information recorded on the production records was not consistently in agreement with crediting information on the supporting documentation, such as CN labels, product formulation statements, standardized recipes, or the Food Buying Guide. Including meal pattern contributions for specified grade groups on production records is not required, though it must be documented and available for staff.

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 for all menu items, including daily alternate entrees and sides, such as Smucker's Un crustables and string cheese. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

### **Vegetable Subgroup Crediting**

Three vegetables credited towards incorrect subgroups during the review period. Asparagus, peas, and green beans do not credit towards the dark green subgroup, nor do beets credit towards the red/orange subgroup. Asparagus, green beans, and beets credit towards the other subgroup, and peas credit towards the starchy subgroup. Weekly vegetable subgroup requirements were met during the review period.

### **Weight versus Volume**

Use cup volume amounts when recording portion sizes on the production records for fruits and vegetables. Fruit sizes (e.g. case count) should also be recorded. This is the easiest way to ensure the meal pattern requirements are met. Weight and volume may not be used interchangeably for crediting purposes. A [portion control webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#pc) (https://dpi.wi.gov/school-nutrition/training/webcasts#pc), which describes portion control techniques and explains the difference between weight and volume, is available from the School Nutrition Team (SNT). Earn fifteen minutes of continuing education credit by viewing the webcast.

### **Food Buying Guide**

The [USDA Food Buying Guide for School Meal Programs](#) contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods), including whole fruits like oranges, apples, bananas, and kiwis. Foods that do not have standards of identity are not listed in the Food Buying Guide and require further documentation (a CN label or a PFS) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs. Refer to the Food Buying Guide for more details on how specific foods and ingredients credit toward the meal pattern



(<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>). The [Food Buying Guide Mobile App](#) provides quick access to food yield information to help you make quick purchasing decisions from your mobile device (<https://www.fns.usda.gov/tn/food-buying-guide-mobile-app>).

### **Crediting Documentation**

A Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, m/ma, or other processed food not found in the [USDA Food Buying Guide for Child Nutrition Programs](#) (<https://foodbuyingguide.fns.usda.gov>). A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that include these four things. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label. More information is available on the [Menu Planning webpage](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

When a CN label is not available for a product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in Child Nutrition Programs. Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

### **In-House Yield**

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the school food authority's next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG (e.g. hash brown patties, French fries). [Specific and verifiable procedures](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf>), which must be followed, are available on the [Menu Planning webpage](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

### **Grain-Based Desserts**

No more than 2.0 oz eq of grain-based desserts may be offered per week at lunch. Grain-based desserts that are whole grain-rich credit towards the grain component, but grain-based desserts that are not whole grain-rich (made with more than 50 percent enriched grains) cannot credit towards the grain component. Grain-based desserts contribute towards the weekly grain-based dessert limit regardless of whether they are whole grain-rich or not. Goldfish graham crackers (1.0 oz eq of grain) and chocolate chip cookies (1.25 oz eq of grain) were planned, offered, and served during the review period, exceeding the 2.0 oz eq of grain-based dessert limit.

For additional information on grain-based desserts, watch [“The Grain Component” webcast](#) on our Training webpage (<https://media.dpi.wi.gov/school-nutrition/grains-component/story.html>).

### **Sodium Target 1**

In May 2017, the U.S. Secretary of Agriculture announced schools must continue to meet Sodium Target 1 for school year 2017-2018. USDA recognizes that even though great progress has been made, schools and industry expressed the need for additional time and assistance to effectively achieve changes in the school meal patterns, including those related to sodium. At the same time, the WI DPI encourages schools to “keep in mind the best interests of the students and provide our school children with the most healthful and nutritious meals possible.” Products that can be major contributors of sodium include condiments,

regular canned vegetables, deli meats, dairy products, pickles, olives, and processed food items. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years.

### **Signage**

If you are interested in ordering fillable School Breakfast Program signage from SNT, please visit the [Team Nutrition](https://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

### **Training Recommendation**

Anyone involved with the USDA Child Nutrition Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times during the school year. Classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements, including The Whole Enchilada – Meal Pattern and Offer Versus Serve. Travel and meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training webpage](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast webpage](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts).

### **Corrective Action**

**Meal Pattern Finding #1:** The weekly minimum requirement for m/ma was not met for lunch during the review period. The following represent the minimum oz eq of m/ma offered each day during the review period:

- Monday – Smucker's Uncrustable and string cheese, 2.0 oz eq
- Tuesday – Mini corn dogs (4 each), 1.25 oz eq
- Wednesday – Smucker's Uncrustable and string cheese, 2.0 oz eq
- Thursday – Chicken nuggets (4 each), 1.5 oz eq
- Friday – Cheese pizza, and Smucker's Uncrustable and string cheese, 2.0 oz eq each

The weekly minimum requirement is 9.0 oz eq; 8.75 oz eq were offered during the review period. **This is a repeat finding subject to fiscal action.**

**Required Corrective Action:** Please submit a statement describing how you will meet the weekly minimum requirement going forward.

**Meal Pattern Finding #2:** The daily minimum requirement for grain was not met for breakfast on February 16 as a result of Nabisco graham crackers. Nabisco graham crackers credit as 0.75 oz eq grain and must be bundled with other items so at least 1.0 oz eq of *grain* is offered to meet the daily minimum requirement and so these items can be counted as an item for the breakfast meal pattern. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

**Required Corrective Action:** Please submit a statement describing how you will meet the daily minimum requirement going forward.

**Meal Pattern Finding #3:** Production records for breakfast and lunch for the review period were incomplete. Daily alternate offerings, including Smucker's Uncrustables and string cheese, were not recorded. All required information on the template must be documented for all menu items.

**Required Corrective Action:** Submit two days of completed production records for breakfast at Albrecht Elementary and for lunch at Brodhead Middle School. Include planned and actual portion sizes and usage for all items, as well as all other information on the [production record requirements \("Must Haves and Nice to Haves"\) list](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).

**Meal Pattern Finding #4:** Staff are not trained on OVS.

**Required Corrective Action:** Watch the [Offer Versus Serve webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) on the [SNT Training webpage](https://dpi.wi.gov/school-nutrition/training) (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>, <https://dpi.wi.gov/school-nutrition/training>). Submit a roster or checklist indicating all staff have viewed the webcast.

**Meal Pattern Finding #5:** No more than 2.0 oz eq of grain-based desserts can be offered per week at lunch.

**Required Corrective Action:** Please submit a statement describing how you will comply with the weekly grain-based dessert limit going forward.

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant addressed financial topics with the Business Manager including how to locate the agency's Child Nutrition Program report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage ([dpi.wi.gov/nutrition/online-services](https://dpi.wi.gov/nutrition/online-services)).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.
- There are several tools to help with costing out menus and helping with budgeting on the [Financial Management](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) webpage under the Budgeting and Cost control section (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

##### 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; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>). The business manager did an excellent job with this.
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not

to exceed a three month average of operating expenses to remain in compliance with a non-profit status.

- 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. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
  - Under “Purchases Services” report any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “nonprogram 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.
  - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

#### Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

#### Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter
  - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department

of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

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

- ❑ **Finding #1:** The SFA does not have a written unpaid meal charge policy which was required to be in place and distributed to families by July 1, 2017.  
**Corrective Action Needed:** Please develop a timeline for a written unpaid meal charge policy and how it will be distributed to households annually.

### **Paid Lunch Equity (PLE)**

#### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the [PLE 'In a Nutshell'](#) for more information on the PLE tool.
- Step by step instructions to completing the PLE tool can be found on our [financial website](#) under Paid Lunch Equity.
- This requirement is being modified by USDA, please watch for upcoming communications for PLE in the near future.

### **Revenue from Nonprogram Foods**

#### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

- 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.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- 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>).

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

### Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

### 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: Revenue from Nonprogram Foods

- ❑ **Finding:** The [Nonprogram Foods Revenue Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) has not been completed for the current school year.

#### **Corrective Action Needed:**

1. Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions.
2. Provide a completed tool for Brodhead School District using a 5-day reference period in the current school year (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story\_html5.html).

### Indirect Costs

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
  - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
  - Utility charges - separately metered or current usage study by the local utility company.
  - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
  - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.

- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.
- No indirect costs are being charged to school food service.

#### 4. GENERAL PROGRAM COMPLIANCE

##### Civil Rights

##### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

##### Nondiscrimination 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 abbreviated 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.

##### And Justice for All Poster

- "And Justice for All" posters need to be posted in public view where the program is offered.

##### Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

##### Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

##### Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical 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>)
- 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 may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. 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>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

### Overt Identification

#### 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 within 3 days. You will want to make sure that this is 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](#) for assistance in filing these complaints ([https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)).

### Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding#1:** The district does not have specific language regarding discrimination complaints in the National School Lunch or Breakfast program.  
**Corrective Action Required:** Please modify the current discrimination complaint procedure to include language specifically for school food service, or create a policy specifically for school food service. Please provide your timeline for this update or new policy creation.
- ❑ **Finding#2:** The annual [civil rights training](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>) has only been completed by the food service director. All school nutrition staff, student helpers and non-school food service staff who have a responsibility with school food service are required to review the civil rights training annually and sign off this has been completed.  
**Corrective Action Required:** Have all individuals with school food service responsibilities complete the civil rights training. Provide the [sign in sheet](#) once completed.
- ❑ **Finding#3:** The shortened nondiscrimination statement had been modified to “This institution is an equal opportunity provider and employer.”



**Corrective Action Required:** Update the shortened statement by removing “and employer” at the end, the statement cannot be modified at all. **Corrected onsite, no further action required.**

- ❑ **Finding#4:** The “And Justice for All” poster was posted in the kitchen and not in a public area, where meal recipients can view.

Corrective Action Required: Move the poster to the cafeteria area so the public is able to access the information on the poster. **Corrected on site – no further action required.**

## On-site Monitoring

### Commendations/Comments/Technical Assistance (TA)/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; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our Administrative Review webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).
- Onsite monitoring was completed as required for each school in the district.

## Local Wellness Policy

### Commendations/Comments/Technical Assistance (TA)/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 2016-17 with full compliance of the final rule by June 30, 2017.

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

### 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 (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*. This can be accessed electronically at <http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit> . 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).

#### Resources:

- 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).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

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

**Finding #1** SFA LWP meets some but not all requirements as stipulated above.

**Corrective Action Required:** Please provide a timeline for updating your policy to become compliant with the final rule. Missing sections: 1) Policy leadership, 2) Public Involvement 3) Food and Beverage Marketing 4) Nutrition Promotion 5) Update/Inform the public. Please see the [Local Wellness Policy Checklist](#) for details and sample language.

#### **SFA is required to have a committee of diverse stakeholders and/or a roster of those involved**

**Technical Assistance:** 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. SFA wellness committees should include a diverse team of committed school and community stakeholders. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.

**SFA is required to inform potential stakeholders of their ability to participate in the LWP (**

**Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of 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>).

**SFA is required to complete an assessment of the LWP**

**Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of 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>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

**SFA required to inform the public of the results of the most recent assessment**

**Technical Assistance** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. 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. Following the assessment, 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. 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. It is recommended SFAs include an improvement plan upon the results of the assessment.

**Technical Assistance** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA 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.

## **Smart Snacks in Schools**

### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. More information is available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Entrées, snacks, and sides must meet one of the following criteria: be a whole grain-rich product; have a fruit, vegetable, dairy product, or protein food (meat, beans, poultry, etc.) as the first ingredient; or be a combination food with at least ¼ cup fruit and/or vegetable. Nutrient standards should be assessed for the serving size available for purchase and include all accompaniments.

- **Foods that do not meet Smart Snacks standards**
  - Brachs fruit snacks (first ingredient corn syrup)
  - Kellogg's fruit snacks (first ingredient corn syrup)
  
  - **Not whole grain-rich (WGR)** - *Foods that meet the WGR criteria contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. WGR products list a whole grain first in the product ingredient declaration, indicating whole grains are the primary ingredient by weight.*
    - Nutty Buddy bars
    - Fritos corn chips
  
    - Ritz Bits sandwich crackers
  
  - **Exceed calorie standards**
    - Sun Chips, Harvest Cheddar chips
    - Pringles, Cheddar Cheese and Sour Cream and Onion chips
    - Kar's Trail Mix
    - Pop-Tarts
    - Bosco Cheese Pizza, 7 inch
  
  - **Exceed sodium standards**
    - Sun Chips, Harvest Cheddar and Garden Salsa chips
    - Pringles, Cheddar Cheese and Sour Cream and Onion chips
    - Smartfood White Cheddar Cheese popcorn
    - Tyson chicken patty (Item Number 281622) on a Pan o Gold hamburger bun (#706)
    - Klement's 0.8 oz Teriyaki Beef Stick (3548057)
  
  - **Exceed calories from total fat standards**
    - Tyson chicken rings (Item Number 281771)

- Hamburger (Fire River Farms Reliance Reorder #2325278 and USDA Choice Beef Chuck Steak Burgers 100690) or cheeseburger on a Pan o Gold hamburger bun (#706)
  - Klement’s 0.8 oz Teriyaki Beef Stick (3548057)
  - Tyson chicken nuggets (Item Number 281831)
- **Exceed saturated fat standards**
  - Chewy Granola Bars, chocolate chip
- **Beverages that do not meet Smart Snacks standards** - *Only plain water (flat or carbonated), milk (less than 12 fluid ounces; skim [flavored or unflavored] or low-fat [unflavored]), or 100% juice (less than 12 fluid ounces) may be sold to students in the middle school age/grade group.*
  - Tum-E Yummies, all flavors
  - Powerade, all sizes and all flavors
  - Vitamin Water, all flavors
  - Gold Peak Iced Tea – *Caffeine is not allowable for students in the middle school age/grade group.*
  - Minute Maid Sparkling, all flavors

DPI SNT recommends using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator) (https://foodplanner.healthiergeneration.org/calculator) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records. Stapling a complete nutrition facts label with ingredient statement to the printout is a best practice. SNT has also developed a [Smart Snacks Recipe Analyzer](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/smart-snacks-recipe-analyzer.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/smart-snacks-recipe-analyzer.xlsx).

## Second Meals

A student may purchase a second meal, but all of the items in the meal must meet the Smart Snacks standards individually and be sold individually. Entrée items are exempt from the Smart Snacks standards on the day of and day after they are offered as part of the NSLP or SBP. Therefore, second entrées may be purchased even if they do not meet the standards. However, “bundling” of the entrées and the side items is not exempt. A second meal cannot be sold as a unit since the unit would not meet the standards. Similarly, if a student gets to the point of service with a non-reimbursable meal and refuses to select something to create a reimbursable meal, the foods that were selected need to be sold individually as a la carte items and each meet the Smart Snacks standards.

There are situations for some foods where meeting the standards is feasible. Milk types that are allowable with reimbursable meals are allowable at all grade levels under Smart Snacks. Fresh, frozen, and canned fruits or vegetables with no added ingredients except water or juice, extra light syrup, or light syrup (in the case of canned fruit) are exempt from the Smart Snacks standards and do not need to be evaluated further. Therefore, items that do need to be analyzed include grain-based sides (e.g. bread sticks), vegetables cooked with fat, extra items (e.g. baked chips, pretzels) and desserts.

## Fundraising

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, and 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>).

**Smart Snacks Finding #1:** Sixteen foods and five beverages sold a la carte were determined to be non-compliant with Smart Snacks standards.

**Required Corrective Action:** Indicate in a written response intentions regarding evaluating all foods and beverages for sale a la carte, keeping necessary documentation, using inventories of non-compliant products, purchasing compliant replacement products, and training.

## Professional Standards

### Commendations/Comments/Technical Assistance (TA)/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 the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- 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.

Professional Standards: New Food Service Director Hiring Requirements

### Professional Standards: Training 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, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A [template tracking tool](#) is posted to our [Professional Standards](#) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>).

### 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: Professional Standards

- Finding #1:** Training is not being monitored on a tracking tool.  
**Corrective Action Needed:** Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action. This includes all student workers and non-foodservice staff.

## Water

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

For more information on the water requirement, see [SP 28-2011](#) ([https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/gm\\_sp\\_28\\_2011\\_r.doc](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/gm_sp_28_2011_r.doc))

### Findings and Corrective Action: Water

- Finding:** Water was not available to students during the breakfast meal service.  
**Corrective Action Needed:** Provide a statement of understanding that water will be provided to all students during breakfast meal services moving forward.

## **Food Safety and Storage**

### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

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

### **Food Safety Inspections**

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

### **Temperatures**

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

### **Food Safety Plans**

- The Food Safety Plan was available for review.
- 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](#) 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, including afterschool snacks and sharing tables.
- 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.

### **Food Employee Reporting Agreements**

- All food service employees must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.



### Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. All areas were clean,

### Time/Temperature Control for Safety (TCS) Food

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

### Time as Public Health Control

- When using “Time as a Public Health Control:”
  - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
  - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
  - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

### Sharing and No Thank You Tables

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.

#### **Sharing Table**

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.

#### **No Thank You Table**

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**

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.

### **Monitoring Log**

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: Food Safety**

- Finding #1:** Generic categorization of menu items into Process 1, 2, and 3.

**Corrective Action Required:** Categorize all specific menu items on chart for Menu Items Categorized by Process 1, 2, or 3. Submit updated chart or approval from your local sanitarian that the food safety plan is approved as is.

- ❑ **Finding#2:** Most recent food safety inspection report is not posted in a publicly visible location.  
**Corrective Action Required:** Post most recent food safety inspection report in location visible to public. **Completed on-site. No further action required.**
- ❑ **Finding#3:** No sanitarian-approved SOP for sharing or no thank you tables.  
**Corrective Action Required:** If you choose to continue to offer sharing tables, obtain sanitarian approval. Submit copy of approved SOP with proof of sanitarian approval as an attachment to assigned DPI Nutrition Program Consultant via email.

## **Buy American**

### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

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.
- What is acceptable to determine compliance on a label? 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](#) 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](#) 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.

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

There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
  - a. Cost analysis
  - b. Seasonality- record the months that the domestic product is not available
  - c. Availability
  - d. Substitution- record the reason the distributor substituted the product
  - e. Distribution- record the reason the distributor carries the non-domestic product
  - f. Other- explain

You may record additional information if you find it beneficial.

A suggested template is found on the [Buy American](#) webpage under Buy American Noncompliant Product list (Word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### **Findings and Corrective Action Needed: Buy American**

**Finding:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Canned mandarin oranges from China
- Canned pineapple from Thailand

**Required Corrective Action:** Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products.

## **Reporting and Recordkeeping**

### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

- All free and reduced price applications, including applications from households 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.

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

### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

### **Breakfast Promotion**

More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

### **Summer Meals**

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Brodhead School District USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)

- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

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

### **Findings and Corrective Action: SBP and SFSP Outreach**

- ❑ **Finding #1:** Documentation to support that Summer Food Service Feeding information was provided to households was not provided.  
**Corrective Action Required:** Please provide a statement of understanding that this is a program requirement and how this will be communicated to households this spring.

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

### **Afterschool Snacks**

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

- Each site participating in the Afterschool Snack Program needs to have an [onsite monitoring review](#) completed within the first four weeks of operation, and a second review within the school year. The review form to complete may be found on our [Afterschool Snack Program](#) webpage (<http://dpi.wi.gov/school-nutrition/after-school>).
- The meal pattern requirements have recently been updated for children 5 and under (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afterschool-snacks-meal-pattern.pdf>). Sample menus are available on the Afterschool Snack webpage.
- Each afterschool snack location is required to maintain documentation supporting that reimbursable meals were provided to students, including production records with snack items and serving size. Menus are not required, but encouraged. Production record examples are found on the afterschool snack program webpage linked above.
- Participating students are claimed by eligibility category (free, reduced, or paid) when a reimbursable snack is selected.
- Afterschool sites must provide educational or enrichment activities in an organized, structured, and supervised environment.
- [Snack Count Sheets](#) and [production record templates](#) are located on the Afterschool Snack webpage (<http://dpi.wi.gov/school-nutrition/after-school>).

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

- ❑ **Finding#1:** Documentation (menus/production records) to support that two components were provided to each student for the afterschool program was not available.  
**Corrective Action Required:** Please provide your plan on how documentation will be maintained to record what food items are served, serving sizes, and total quantity served.
- ❑ **Finding#2:** Onsite monitoring of the afterschool snack program was not completed.

**Corrective Action Required:** Complete the on-site monitoring form for this program and provide the completed form, as well as a statement of understanding that this is required twice per year, the first within the first 4 weeks of the program start date.

- ❑ **Finding#3:** Students were being claimed for reimbursement, if only one component was taken.  
**Corrective Action Required:** Fiscal Action will be assessed for all non-reimbursable snacks served for the 2017-18 school year through February 2018. Please provide the snack count sheets for each month in operation from September 2017 through January 2018. I have February 2018 count sheets. Please indicate which students are free/reduced. Since the count sheets are color coded, please copy in color if an option or indicate on the sheet F or R next to the student so this can be determined.
- ❑ **Finding#4:** Snack count sheets provided to the afterschool snack provider are color coded based on eligibility.  
**Corrective Action Required:** There should be no indication on the count sheets used by the afterschool snack coordinator to potentially disclose a student's free or reduced status. Please remove the color coding from the count sheets and provide a statement of understanding of this requirement.

## **Special Milk Program**

### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

Schools in the National School Lunch or School Breakfast Programs may participate in the Special Milk Program to provide milk to children in half-day pre-kindergarten and kindergarten programs where children do not have access to the school meal programs.

A comparison chart for the Special Milk Program (federal) and Wisconsin School Day Milk Program (state) may be helpful in determining what milk program will be best for your elementary school:  
<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smp-wsdmp-comparison-chart.pdf>

The Ronald R Albrecht Elementary School could claim milks for free and reduced students grades K4-5. If your school selects to operate the Wisconsin School Day Milk Program. A contract update will be necessary. Please discuss with your Nutrition Program Consultant who completed your review.

### **Findings and Corrective Action: Special Milk Program**

- ❑ **Finding #1:** The Special Milk Program may only be offered to students who do not have access to the National School Lunch or School Breakfast Program. The morning and afternoon 4K students meet this requirement at Ronald R Albrecht Elementary School, but all students have been receiving a milk between 4K-5<sup>th</sup> grade and all have been claimed for reimbursement.

#### **Corrective Action Required:**

1. All staff involved in the SMP are to complete the SMP webcast  
<http://www.youtube.com/watch?v=JitLsFRI-dU> and provide the date and sign off sheet of who completed.
2. All claims for the current school year and the prior three school years appear to have been claiming all grades. Fiscal action will be assessed for any student improperly claimed for

reimbursement. Please provide the total the milk counts for all the 4K students from September 2014 through February 2018. These milks may be claimed for reimbursement, all other milks are unallowable and the reimbursement received will need to be repaid to the state. Moving forward beginning March 2018, only submit milk counts for 4K students.

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

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

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



*With School Nutrition Programs!*