

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

School Food Authority: New Glarus School District

Agency Code: 23-3934

School(s) Reviewed: New Glarus Middle School

Review Date(s): 5/14/18-5/15/18

Date of Exit Conference: 5/15/18

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 New Glarus School District for the courtesies extended to us during the on-site review. All were receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the onsite portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)

155 eligibility determinations were reviewed, 1 error was identified. Great job! No fiscal action will be assessed, but this error does need to be corrected.

Public Release

All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc) before the start of the school year (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc>). The purpose is to inform the public that free and reduced price meals and free milk 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.

Direct Certification

As a reminder, the original State output match file (txt format) must be retained. This is the proper source document to support a direct certification eligibility. The State output file should then be checked against the Skyward file periodically to ensure accuracy of data transfer.

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](https://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:** Student A as indicated on the SFA-1 form was not correctly certified for meal benefits. Foster status (E code or application) does *not* extend meal eligibility.

Corrective Action Needed: Send the household a letter of adverse action. Provide 10 calendar days to appeal prior to decreasing meal benefits in the point of sales system. Encourage the household to apply via income. Send a copy of this letter to the consultant.

Verification

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

- 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.
- When using the Standard Sampling Method, SFAs must first choose randomly from error prone applications. Error prone is defined on pg. 98 in the [Eligibility Manual for School Meals](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) as applications within \$100 per month of the applicable Income Eligibility Guidelines (IEGs) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).
- The [Verification Tracker Forms](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx) can be used to document the Verification Process from start to finish (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>).
- Once the documents submitted by the household have been reviewed, the agency should send the ["We have Checked Letter"](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-we-have-checked-1718.docx) notifying them of the result (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-we-have-checked-1718.docx>).

Findings and Corrective Action Needed: Verification

- ✓ **Finding #1:** The verification process and Section 5 of the Verification Collection Report (VCR) were not completed correctly. The agency falsely reported that direct *verification* was conducted, the sample application chosen for verification was error prone, and the results of verification were not reported. State of WI VCR data has already been sent to USDA and cannot be adjusted.

Corrective Action Needed: Watch the [Verification process](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html) and [Verification Collection Report](https://media.dpi.wi.gov/school-nutrition/submitting-the-verification-collection-report/story.html) webcasts on the SNT website (https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html; <https://media.dpi.wi.gov/school-nutrition/submitting-the-verification-collection-report/story.html>). Submit the date of completion to the consultant. By completing this training in combination with the technical assistance provided onsite, the expectation is that the verification process and report will be completed correctly moving forward.

Completed. No further action required.

- ❑ **Finding #2:** Student B, selected for verification, was not verified correctly. The application was verified at face-value when the source document for foster status should have been obtained. Income stubs were submitted by the household to support gross income reported on the application in addition to foster status, but the income is too high to qualify for meal benefits.

Corrective Action Needed: Send the consultant a copy of the adverse action letter which should also ask the household to submit proof of foster status before the end of the appeal timeframe. If proper documentation is obtained, the student will remain at free status. If the documentation cannot verify the child is the *legal responsibility of the court*, the household must be changed to paid status.

Meal Counting and Claiming

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

- Work with Skyward to pull the correct attendance factor and highest enrollment onto the accuclaim report. This will make monthly claim reporting more efficient.
- Consider reviewing Severe Need Breakfast reimbursement for the 18-19 SY. A school is eligible for severe need reimbursement if 40 percent or more of the student lunches served at the school in the second preceding school year (SY 2016-17) were served free or at a reduced price. Regulations require documentation of eligibility to be maintained on file by the SFA for periodic review. Severe need breakfast requests and approvals are part of the annual online contract renewal.
- Four non-reimbursable meals were observed at breakfast. Fiscal action will be assessed on these meals.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #1:** Systemic consolidation error. The middle school meal counts are claimed under the High School code and vice versa. The Middle School code is 250 and the high school is 40.

Corrective Action Needed:

a. Submit an excel template site-based claim adjustment (pg. 43 in the [Claiming Manual](#)) for the SBP and the NSLP for the months of September 2017- April 2018 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/site-based-claiming-manual.pdf>). Submit the *differences* to the consultant, who will review and work with the SNT Accountant to make a manual adjustment.

Note: Difference should be submitted for the originally claimed (uncorrected) meal counts. Corrections to the student entity coding error on the accuclaim will be corrected through the fiscal review process.

b. Submit the May 2018 accuclaim reports district-wide once the claim has been filed online to document the entire claiming process has been fixed.

- ❑ **Finding #2:** Systemic student entity coding error on the accuclaim report. Middle School students are coded to the high school entity and vice versa resulting in meals claimed in excess of those eligible by site. Students were assigned to the correct entity during the onsite visit and the meals were found to be compliant with the attendance-adjusted eligibles. Accuclaims reports are run each month and reviewed by the district, but the report was not reviewed for attendance-adjusted eligibles as intended.

Corrective Action Needed:

- a) By signing this report, you agree to compare attendance-adjusted eligibles in each category against the daily participation counts. Any questionable counts should be reviewed/corrected prior to claim submission. District staff should continue to review and sign-off on the monthly edit check report.
- b) Submit accuclaims for the high school and middle school entities from September 2017- April, 2018. Fiscal action will be calculated at the review and non-review site.
- c) Work with Skyward to correct the way students are coded by entity on the accuclaim report. **No further action required for part c). Corrected onsite.**

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

We extend sincere appreciation to the food service director (FSD) and nutrition professionals at New Glarus School District. Thank you for the time, organization, and efforts that you have put into preparing for this review. The time that you took to meet with us and answer questions on site is greatly appreciated. New Glarus has an excellent meal program with appealing menu items.

Comments/Technical Assistance/Compliance Reminders

Training opportunities

- It is recommended that anyone involved with the School Meals Program attend DPI training classes. The classes are offered in the summer and select other times throughout the year. Travel/meal expenses are allowable food service expenses for your program.
- The classes provide an overview of all areas of the NSLP and SBP requirements including verification, free/reduced meal applications, meal pattern, offer versus serve, and record keeping requirements.
- Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. Including:
 - [Smart Snacks](https://dpi.wi.gov/school-nutrition/training/webcasts#ss) (<https://dpi.wi.gov/school-nutrition/training/webcasts#ss>)
 - [Breakfast](https://dpi.wi.gov/school-nutrition/training/webcasts#sbp) (<https://dpi.wi.gov/school-nutrition/training/webcasts#sbp>)
 - [Offer versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>)

These and more can be found on DPI's [Webcast Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (<https://dpi.wi.gov/school-nutrition/training/webcasts>)

Production Records

- Be specific on production records about the identity, brand, and description of the items served. The production records should reflect actual planned number of servings, which should be forecasted based on historical data.
- Including the crediting and meal pattern contributions on production records is not required, though it must be documented and available for staff. 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.
- The current production records being used list the serving utensil. This is helpful for staff so students are served correct portions and are able to serve themselves the planned portion sizes as well.

Specialized Recipes

- Production records should list each variety of cereal, flavor of muffin, juice, and/or fruit type. Listing each item on the production record will ensure that what the menu planner has planned to be offered each day is followed.
- This practice will help with forecasting and should help control waste and food costs. If it becomes too time- or labor-intensive to record cereal, muffin, juice, or other breakfast item usage by type on production records, consider using recipes.
- Individual recipes document average cereal, muffin, juice, or other breakfast item usage by meal (breakfast or lunch) and grade group. When a cereal, muffin, juice, or other 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.

- The [Milk Recipe](#) format/template found on DPI website can be adjusted (cereal, muffins, juice) for use in your own kitchen (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milkrecipe_0514_2.doc).
- Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient (even if it is water) should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service kitchen. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock.
- Technical Assistance was offered on site regarding the homemade macaroni and cheese recipe. During the week of review the Macaroni and Cheese Bar (04.11.18) production record listed the rotini (1 cup) and homemade cheese sauce (1/4 cup) separately. The documentation provided included a recipe for homemade Macaroni and Cheese with a total of one cup being offered to students. The recipe credits as 1.75 oz eq wg and 2 oz eq m/ma. FSD will update the production record.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding #1:** Ground beef, beef crumbles, and ground turkey cannot be used interchangeably in recipes. The Food Buying Guide does not have the same yield factor for these items. Separate recipes are needed for each of the different meats used to produce the same recipe.

Corrective Action Needed: Submit updated standardized recipes for the following:

- The Taco Meat (ENT 041A)
- Beef Chili (ENT 021)

❑ **Finding #2:** On the day of observation vegetable oil was added to the rotini for the pasta bar to keep the pasta from sticking and to keep the product appealing as students served themselves. The Spaghetti and Meat Sauce recipe, which included rotini, provided for review did not include oil nor was a separate recipe provided for the rotini. The addition of oil must be considered when menu planning. Daily and weekly menu items must meet the dietary specification (e.g., calories, saturated fat, and sodium).

Corrective Action Needed: Submit an updated standardized recipe(s) for the following:

- Spaghetti with Meat Sauce (ENT 008) listing the addition of the oil along with updated directions for use or a separate recipe for the pasta used with this sauce.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

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

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other) 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](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

- Refer to the [expenditure categories](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc) when completing the AFR (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc).

Allowable Costs

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](#) may be found on our Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding:** The Annual Financial Report was not completed correctly. Costs are lumped under purchased services. Costs must be separated into labor, foods, equipment, purchased services, and other. The FSMC fee should be the only FSMC-related expense under purchased services in addition to food safety inspections, and equipment repairs.

Corrective Action Needed: Correctly allocate the 16-17 SY expenses and re-submit the report via email to the consultant. Copy the DPI accountant jacqueline.jordee@dpi.wi.gov on the communication. She will need to manually enter the adjustments.

Paid Lunch Equity (PLE)

Comments/Technical Assistance (TA)/Compliance Reminders

Findings and Corrective Action: Paid Lunch Equity

- ✓ **Finding:** The 1718 SY PLE tool was run correctly, but the paid lunch price(s) were not set according to the outcome of the tool. The tool required a \$2.83 minimum weighted average and the agency implemented a \$2.78 weighted average.

Corrective Action Required: By signing this report, the agency agrees meet the minimum PLE requirement each year. Because it is late in the school year and USDA recently implemented an exemption for PLE if the agency has a zero or positive fund balance as of January 31st, the agency will not be required to make-up the revenue deficit.

Note: The PLE tool can still be completed and prices raised if the agency feels it is necessary to support food service operations. Upload the [tool](#) to the 18-19 SY online contract and complete the [PLE Google survey](#) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/ple-tool-1819.xlsx; https://goo.gl/forms/m3YAS34LPQreq5Ei1).

Revenue from Nonprogram Foods

- [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 Food Revenue Tool submitted offsite does not reflect all nonprogram food items sold during the 5 day reference period.

Corrective Action Needed: Provide an updated copy of the Nonprogram food revenue tool that includes, adult meals, extra entrees, and extra milk sales. Once submitted, the consultant can assess if the agency is in compliance with the revenue ratio.

Completed onsite. The agency is in compliance. No further action required.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

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.

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 practitioner*. 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.

Processes for complaints

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 5 days.
- 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).

Findings and Corrective Action Needed: Civil Rights

□ **Finding:** The authorized representative did not complete USDA civil rights training.

Corrective Action Required: Review the [USDA Civil Rights PowerPoint](#) posted on the SNT website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>).

Food Service Management Company (FSMC)

As a reminder, the following duties may not be delegated to the FSMC:

- Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal

claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year. It is due February 1 annually and the documents are kept onsite.

- Signature Authority –a representative of the SFA must sign off on the contracts for the SFA
- Edit Checks- an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software

Local Wellness Policy

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

New Glarus School District has recently updated their LWP. An assessment was completed and posted to the districts webpage. As a reminder, the policy must also include language on Food and Beverage Marketing. SFAs may only market products that adhere to Smart Snacks guidelines during the school day.

Smart Snacks in Schools

Commendations

The food service director is utilizing the Smart Snacks calculator for all of the products offered and keeping all documentation well organized. The school district maintains two beverage vending machines in the cafeteria, which are not in compliance at this time.

Comments/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. You can find more information on our [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).
- The School Nutrition Team (SNT) recommends using the Alliance for a Healthier Generation Smart Snacks Product Calculator, found on the [Smart Snacks](https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/smart-snacks) webpage to assess compliance. (https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/smart-snacks)
- 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. As a best practice, staple a complete label with nutrition facts (name of the food item, brand name, nutrition facts, and ingredients) or empty package to the printout.
- The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.
- If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group.
- For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie (≤ 5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (< 5 kcal/8 fluid oz; ≤ 10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable.
- During the onsite review, two vending machines in the cafeteria were out of compliance with the Smart Snacks Standards. The following Coke products (Diet Coke, Coke Zero, Mellow

Yellow, Powerade, Vitamin Water, all in 20 oz servings) are not allowed for middle school students.

- Technical Assistance was provided onsite to the Authorized Representative and options were discussed to bring these machines into compliance.

Professional Standards

Technical Assistance (TA)/Compliance Reminders

- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- As a reminder, staff categorized as “manager” for professional standards need 10 hours of annual training.

Food Safety, Storage and Buy American

Commendations/Comments

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Buy American

The agency is in full compliance.

Reporting and Recordkeeping

Findings and Corrective Action: Reporting and Recordkeeping

- ✓ **Finding:** Records of the WSDMP ½ pint milk carton cost are not kept on file to support the 1617 SY claim.

Corrective Action Required: The food service director has already fixed this issue by retaining records for the current school year to support the upcoming 17-18 SY annual claim. By signing this report the agency agrees to retain records for 3 year + the current school year.

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

Commendations/Technical Assistance (TA)/Compliance Reminders

Breakfast Promotion

The breakfast participation is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. Offering an alternative breakfast model may be beneficial. The agency has been discussing a grab-and-go alternate breakfast option. 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 unique promotional events like School Breakfast Week.

Summer Meals

Even though the Summer Food Service Program (SFSP) is not operated at New Glarus School District USDA requires all SFAs to assist with outreach. This includes informing 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

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

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

Point of Service Counts for the Wisconsin School Day Program must be recorded as the student receives the milk.

Findings and Corrective Action: Wisconsin School Day Milk Program

Finding: The agency was unable to provide documentation to support that milk served for the WSDMP is "WI produced". This means that all or some of the raw milk used by the milk processor was produced in WI.

Corrective Action Required: Follow-up with your milk distributor and obtain a statement outlining where your raw milk is produced.

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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!