

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

School Food Authority: Princeton School District

Agency Code: 24-4606

School(s) Reviewed: Princeton School District

Review Date(s): April 10-11, 2018

Date of Exit Conference: April 11, 2018

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 Princeton 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. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff at Princeton for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through the service provided to them; food service staff and POS cashier know each child by name. All district employees were very helpful and friendly with the students and the DPI review team.

The DPI review team is confident that the district will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance (TA)/Compliance Reminders

105 eligibility determinations were reviewed, 2 errors were identified.

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.

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) (<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. The output file must also be saved from each DC run.**
- 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.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year.
- **Princeton had a 1.9% certification error rate.** More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA.

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:** One incomplete application was determined; the box indicating the number of household members was blank. There was no change to the determination.

Corrective Action Needed: Error was recorded on the **SFA-1** form. Household number was verified on-site and the HH number was entered into the box. **Corrected on-site. No further action is necessary.**

- ❑ **Finding #2:**

1. The district is disclosing individual free and reduced meal eligibilities for local initiatives like school fee waivers and athletic fee waivers without obtaining *prior* parental consent.
2. Local officials with access to free and reduced data do not have USDA disclosure agreements on file.

Corrective Action Needed:

1. **Discontinue this practice.** Reviewer suggests implementing a [Sharing of Information Form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>), or having the household “self-disclose” by bringing in a copy of their free/reduced approval notice or direct certification approval letter to the designated official operating the outside program. The second option removes food service from these types of requests and is preferred. DPI recommends limiting the number of staff members responsible for collecting this data (e.g., one school secretary who has been trained on confidentiality, rather than each athletic coach). **Submit a written statement explaining how the district will handle/improve free and reduced data disclosure moving forward.**
2. **Submit copies of the signed [disclosure agreement form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure)** (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>) **for anyone working outside of food service, who is determined to need access to this information** (e.g., IT, secretaries handling local fee waivers, staff handling state/federal reporting individual F/R data). **The goal is to limit the number of people who need to know this information and make sure these individuals understand the consequences of improper sharing/release of this information.**

Note: aggregate data (just F/R numbers or percentages without a connection to individual names does not require prior parental sign-off before sharing and often times satisfies the request).

Verification

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.

- The LEA must complete the verification activities no later than November 15 of each school year [7 CFR 245.6a(b)(1)]. However, the LEA may request an extension of the November 15 deadline, in writing, from the State agency.

Meal Counting and Claiming

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.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- The meal counting and claim for the Review Month was conducted perfectly.
- 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.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

We extend sincere appreciation to the Food Service Director and Assistance. Thank you for your timely communication, prompt action, and detail to organization. We appreciate the time you took to answer our questions while onsite. It is evident that you are dedicated to feeding healthy meals to Wisconsin students!

Princeton School District serves a wide variety of appealing fruits and vegetables on a daily basis. We applaud the effort put into your daily salad bar, and appreciate the offering of both cold and hot vegetables. Princeton School District properly implements Offer vs. Serve, and ensures students have access to fruits and/or vegetables several times in the service line. Keep up the nice work, Princeton Nutrition Team!

Comments/Technical Assistance/Compliance Reminders

Granola bar crediting: Documentation for crediting the [Quaker Chewy Granola Bar Maple Brown Sugar](https://www.pepsicoschoolsource.com/media/1633/quaker-chewy-granola-bar-maple-brown-sugar.pdf) can be found on the Pepsico webpage (https://www.pepsicoschoolsource.com/media/1633/quaker-chewy-granola-bar-maple-brown-sugar.pdf). Please update/add this file to your documentation resources.

CACFP: The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. Pre-kindergarten is exempt from the CACFP meal pattern if they are comingled with older students following the National School Lunch Program; *meaning that pre-k students can follow the NSLP meal pattern if they are served at the same time as older students and without distinction.*

More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Contact Erin Opgenorth (erin.opgenorth@dpi.wi.gov) or Tanya Kirtz (tanya.kirtz@dpi.wi.gov) with any questions.

Salad/Garden bar signage: Consider adding signage to the salad bar that indicates how many pieces/slices of vegetable a student is intended to take. This will help to ensure students are selecting $\geq \frac{1}{2}$ cup fruit and/or vegetable that is required in a reimbursable meal.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding #1: Weekly M/MA shortage at lunch; K-8 ***Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*
Students were being offered at minimum 7.5oz eq M/MA during the week of review, which does not meet the K-8 meal pattern requirement of minimum 9 oz eq M/MA per week. Outlined below are the minimum daily M/MA contributions:

- Monday: 1 oz eq M/MA from PBJ meal
- Tuesday: 1 oz eq M/MA from PBJ meal
- Wednesday: 1.5 oz eq M/MA from mini corndogs
- Thursday: 2 oz eq M/MA from either hotdog or hamburger
- Friday: 2 oz eq M/MA from either hotdog or pizza

Corrective Action Needed for Finding #1: Please submit a written plan of action as to how K-8 meals will be altered to ensure that at minimum 9 oz eq M/MA are offered weekly. Please include specific examples.

Finding #2: Daily grain shortages at lunch; 9-12 ***Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*
On Monday 1 oz eq grain was offered with the PBJ meal. On Thursday 1.5 oz eq was offered with the hot dog bun. High school students must be offered minimum 2 oz eq grain with each meal entrée.

Corrective Action Needed for Finding #2: Please submit a written plan of action as to how 9-12 meals will be altered to ensure that at minimum 2 oz eq grains are offered daily, particularly on days that PBJ and hotdogs are served.

Finding #3: Vegetable subgroup beans/peas(legumes) shortage at lunch; all grades ***Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*
During the week of review, 1/4 cup of baked beans was offered on Wednesday. All grade groups must be offered 1/2 cup of beans/peas(legumes) each week. Please keep in mind that green beans credit as an other vegetable and green peas credit as a starchy vegetable.

Corrective Action Needed for Finding #3: Please submit a written plan of action as to how all grade groups will be offered $\frac{1}{2}$ cup weekly of beans/peas(legumes).

Finding #4: Missing standardized recipes
Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and

procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Corrective Action Needed for Finding #: Please submit standardized recipes for the following recipes utilized during the week of review:

- Ham and cheese sandwich on bun
- Rotini with meat sauce

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant address financial topics with the Business Manager and District Administrator including the 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](http://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

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>).
- **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 snapshot 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](#) 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:** On the Annual Financial Report, the revenues and expenses were not broken out by program and expense category.
Corrective Action Needed: Please provide a statement, going forward, that all expenses and revenues will be broken out by program and allocated accordingly on the annual financial report. We have a resource on our [Financial Management](#) webpage to aid you in this calculation (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- **Finding #2:** Annual Financial Report does not have any revenues or expenses allocated to nonprogram foods and the SFA sells adult meals, extra entrees, salads, and extra milks.
Corrective Action Needed: Please provide a statement, going forward, that all nonprogram food expenses and revenues will be broken out from NSLP and allocated to the nonprogram foods line on the annual financial report. We have a [nonprogram food revenue resource](#) on our website to aid you in this calculation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Paid Lunch Equity (PLE)

Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- **Great job running this tool! The SFA’s current weighted average for 2017-18 SY tool is \$2.56. (Princeton’s 2017-2018 required weighted average price is \$2.68.)**
- 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 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf>).
- Refer to the most recent [PLE memo](#) from DPI (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf>).
- Refer to [SP 17-2017](#) guidance memo from USDA (<https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf>).
- Step by step instructions to completing the PLE tool can be found on our [financial website](#) under Paid Lunch Equity (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Revenue from Nonprogram Foods

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>).

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

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

Adult Meals

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

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- ❑ **Finding:** The Nonprogram Foods Revenue Tool has not been completed for the current school year.

Corrective Action Needed: Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool for Princeton, using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

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. This statement, or a copy of it, should be kept in the food service department.** 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.

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](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** Incorrect Non Discrimination Statement in use on menus and NDS not noted on website or district handbook where federal Child Nutrition Programs are referenced.
Corrective Action Required: Menu for April corrected on-site; no further action required. Add NDS to website and send a screenshot of it. Provide a statement regarding the handbook that indicates understanding that the NDS will be included wherever federal CNP are referenced.
- ❑ **Finding #2:** Civil Rights Compliance form PI-1441 not completed. It is required to be completed annually by October 31st and kept on-site.
Corrective Action Required: Complete the PI-1441 for the 17-18 school year and submit to consultant as corrective action.
- ❑ **Finding #3:** District does not have a written complaint policy for USDA programs.
Corrective Action Required: Submit a timeline for a written complaint policy regarding the federal Child Nutrition Programs.

Local Wellness Policy

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](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<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: SFA LWP meets some but not all requirements as stipulated above (1000)

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule. It needs the addition of language for: Policy Leadership, Public Involvement, Food and Beverage Marketing, The Triennial Assessment and Updating/Informing the Public.

Smart Snacks

Commendations

Thank you for providing Smart Snacks nutrition information prior to the on-site review.

Comments/Technical Assistance/Compliance Reminders

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>). We recommend using the [Alliance for a Healthier Generation Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) to assess product compliance (<https://foodplanner.healthiergeneration.org/calculator/>). 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.

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented.

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>). Use of this template is highly recommended.

The Student Council recorded 3 exempt fundraisers; please be more specific if it is the high school or middle school Student Council.

When food sales (fundraisers) exist, please indicate if it occurs during the school day (midnight- 30 minutes after the end of instruction), or not.

Findings and Corrective Action Needed: Smart Snacks

❑ Finding #1: Non-Compliant Items

Non-Compliant Beverages

- Nesquik 8 fl oz low-fat strawberry milk is non-compliant for all grades. Flavored milk must be fat-free, and ≤8 fl oz when sold in elementary schools and ≤12 fl oz when sold in middle or high schools.
- Gatorade 20 oz G2 is non-compliant for all grades. Low-calorie beverages can only be sold to high school students and must be ≤12 fl oz.

Non-Complaint Food Items

- The first ingredient in the Pop Tart is enriched flour. The first ingredient in grain products must be a whole grain.
- The first ingredient in the Pure Growth Organic Snack Mix is organic wheat flour. The first ingredient in grain products must be a whole grain.

- The first ingredient in the Teddy Grahams Graham Snacks is graham flour. The first ingredient in grain products must be a whole grain.
- The first ingredient in the Pepperidge Farms Goldfish is enriched wheat flour. The first ingredient in grain products must be a whole grain.
- Sunbelt Bakery bars are more than 35% sugar by weight, and are therefore non-compliant.
- Great Value Gluten-Free Granola bars are more than 10% calories from saturated fat, and are therefore non-compliant.
- Sunbelt Peanut Sweet and Salty bars are more than 35% calories from fat, and more than 10% calories from saturated fat, and are therefore non-compliant
- YoCrunch 6 oz M&M yogurt are more than 10% calories from saturated fat, and are therefore non-compliant.

Corrective Action Needed for Finding #1: Submit a written plan of action explaining what will be done to bring all offerings into compliance. If replacement items are selected, submit nutrition information and Smart Snack Compliance results for each new item.

Finding #2: Non-Compliant Beverages for some grade groups

If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. Numerous beverages in the vending machines are non-compliant for some grade groups.

PepsiCo Products:

- Dole Plus 10 fl oz 100% juice can only be sold to middle and high school students. 100% juice must be ≤ 8 fl oz to be sold to elementary students.
- Bubbly 12 fl oz flavored water can only be sold to high school students because it is a no-calorie drink. It must be limited to ≤ 20 fl oz.
- SoBe 20 fl oz flavored water can only be sold to high school students because it is a no-calorie drink. It must be limited to ≤ 20 fl oz.

FACE Machine products:

- Lipton 16.9 fl oz Diet Green Tea can only be sold to high school students because it is a no-calorie drink. It must be limited to ≤ 20 fl oz.
- Clear American 12 fl oz flavored water can only be sold to high school students because it is a no-calorie drink. It must be limited to ≤ 20 fl oz.
- Ocean Spray 10 fl oz Diet Cranberry drink can only be sold to high school students because it is a low-calorie drink. It must be limited to ≤ 12 fl oz.

Corrective Action Needed for Finding #2: Non-compliant products must be removed if elementary and middle school students continue to have access to the vending machines. Alternatively, high school compliant products can remain in the machines if middle and elementary school access is restricted (eg, machine timer, signage, etc). Please submit a written plan of action. If signage is posted, please submit a photo.

Finding #3: Further Compliance Documentation Needed for Products

Incorrect Results from Smart Snacks Products Calculator

- Lay's Baked Chips should be calculated as a vegetable using the Smart Snacks Products Calculator, not a whole grain food.

- Skinny Pop Gluten Free Popcorn should be calculated as a grain, not a protein food.
- Pop Tarts should be calculated as a grain, not a protein food.
- Lala 7 oz yogurt smoothie should be calculated as an “other beverage”
- Dole 3.2 oz Fruitocracy should be calculated as an “none of the above snack”

Products without Smart Snacks Products Calculator documentation

- Orchard Valley Harvest dark chocolate almonds

Corrective Action Needed for Finding #3: Please (re)calculate Smart Snack Compliance for the products listed. Submit the results. From the results, identify products that are not Smart Snack Compliant, if any. Submit a written plan of action explaining what will be done to bring all offerings into compliance. If replacement items are selected, submit nutrition information and Smart Snack Compliance results for each new item.

Professional Standards

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: 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](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours

- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action: Professional Standards

❑ **Finding:** Training is not being monitored on a tracking tool.

Corrective Action Needed: Enter all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

Food Safety and Storage

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). The [Office of Food Safety](#) website (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. 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.
- 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.
- 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.

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

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) 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. **Some items observed in the walk-in cooler, which were opened or out of the original packaging were not date marked.**

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.
 - [Sample SOPs](https://dpi.wi.gov/school-nutrition/food-safety#templates) are on the DPI website (<https://dpi.wi.gov/school-nutrition/food-safety#templates>).

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Incomplete “Description of Program Overview and Facility.” Refer to page 56 of [USDA Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles](https://fns-prod.azureedge.net/sites/default/files/Food_Safety_HACCPGuidance.pdf) (https://fns-prod.azureedge.net/sites/default/files/Food_Safety_HACCPGuidance.pdf).
Corrective Action Needed: Update Description of Program Overview and Facility page of food safety plan with site-specific information. Submit updated page as an attachment to assigned DPI Nutrition Program Consultant via email.
- ❑ **Finding #2:** No annual food safety plan review completed.
Corrective Action Needed: Review entire food safety plan and update as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review page as an attachment to assigned DPI Nutrition Program Consultant via email.
- ❑ **Finding #3:** Food safety plan is missing an SOP for Time as a Public Health Control. Pans of hot food on counter and raw fruits/vegetables in unrefrigerated salad bar
Corrective Action Needed: Create SOP for Time as a Public Health Control. Submit copy of SOP as an attachment to assigned DPI Nutrition Program Consultant via email.

Buy American

Comments/Technical Assistance/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. 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](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) and Buy American monitoring procedures.

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

Findings and Corrective Action Needed: Buy American

- ❑ **Finding: Non-compliant items**
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:
 - Mandarin oranges- China
 - Pineapple tidbits- Thailand

- Cucumbers- Mexico
- Bell peppers- Mexico

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

Reporting and Recordkeeping

Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- 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

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

The breakfast participation in the Princeton School District is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). 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 in the Princeton Schools, 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:** No summer food service outreach was provided to students.

Corrective Action Needed: Please provide a statement indicating how the Princeton School District will notify households of how to find the nearest Summer Foodservice Program using the [DPI program finder](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site).

Wisconsin School Day Milk Program (WSDMP)

Comments/Technical Assistance (TA)/Compliance Reminders

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5th grade.
- Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who "did" take milk not by marking who "did not" take one.
- Per the Agreement for the WSDMP in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and perhaps include that stipulation in the SFA's milk bid.

Findings and Corrective Action: Wisconsin School Day Milk Program

- ❑ **Finding #1:** The district is using an inaccurate POS (point of service) for recording milks taken by students. Milks are recorded based on attendance and morning requests rather than when a student receives the milk. A back-out or reverse system is used to remove milks from the count if students do not take a milk or are absent, rather than recorded when a milk is taken.

Corrective Action Required: Please correct and train all who administer the WSDMP on the Point of Service process. Please submit 4 weeks of correct weekly WSDMP milk counts and the sign-in sheet from the conducted training to DPI as corrective action.

- ❑ **Finding #2:** The half pint milk cost that is used for the WSDMP claim is the highest half pint cost and must be a weighted average half pint milk cost, as white milk is less expensive than chocolate milk and at Princeton, chocolate milk is only offered to students on Fridays.

Corrective Action Needed: Please provide a statement, that going forward, a weighted average milk cost will be used for all WSDMP claims.

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).



With School Nutrition Programs!