

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

School Food Authority: Highland School District

Agency Code: 25-2527

School(s) Reviewed: Highland Middle School

Review Date(s): March 14-15, 2018

Date of Exit Conference: March 15, 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 the Highland 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 gathering and organizing all records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff at the district 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 encouraging reimbursable meals, knowing each student's name, an organized and clean kitchen, and an overall concern for each child. We were impressed that the school principal is present in the cafeteria every day, for each school's lunch meal service.

The DPI review team is confident that the Highland School 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

Eighty-four eligibility determinations were reviewed, two errors were identified. We would also like to commend the determining official for indicating the date an application is received (for proof of eligibility determination within 10 days of receipt, particularly for applications completed and dated by households far in advance of the application being submitted to the school).

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- **Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.**
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
 - When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Public Release

- **All SFAs are required to distribute a [Public Release](#) before the start of the school year** (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals 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, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run .
- **The effective eligibility date for a DC eligible student is the date of the original output file.**
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

Transferring Students

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

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.
- **Highland School District had a 2.4% 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.

Findings and Corrective Action Needed: Certification and Benefit Issuance

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

Corrective Action Needed:

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.

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

Reviewer would like to commend verifying official for using DPI-suggested verification tracker for keeping track of processes and deadlines surrounding the verification process.

Findings and Corrective Action Needed: Verification

No findings.

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.

Findings and Corrective Action Needed: Meal Counting and Claiming

No findings.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all of the staff of Highland School District for their warm welcome. We thoroughly enjoyed our time at your school. A special thanks to the Food Service Director for providing documentation and answering questions prior to coming on-site, as this greatly expedited the review process. It was noted that the school nutrition professionals put a lot of extra care into the Child Nutrition Programs at Highland School District and tailor the menu to their students' needs. The salad bar is a wonderful, fresh addition to the lunch program and offers a great variety. Condiment usage is controlled through limiting the number of pre-packaged condiments students can take, which is excellent. The school nutrition professionals are very knowledgeable and work well with students and school staff. Thank you for your time and dedication to making your Child Nutrition Programs shine!

Technical Assistance

Standardized Recipes

For breakfast, there was not a standardized recipe for the daily buttered toast option. After a conversation with the Food Service Director, the Food Service Director decided that one butter packet would be offered on the side when students select toast, instead of the toast being pre-buttered.

Other than the buttered toast and a couple of other menu items, standardized recipes are utilized and followed at Highland School District. Of the standardized recipes provided for the week of review, some were lacking pieces of information necessary for standardized recipes such as total volume or measure (gallons, pieces) of the recipes, pan sizes, weight or volume in each pan, and the number of pans. Technical assistance was given for the recipe standardization process. Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements. Continue to work towards recipe standardization, and use all resources available to you. Visit our [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

For an overview of essential information needed in standardized recipes, please view the [Standardized Recipe Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf>).

Fruit on Production Record

The type of fruit served each day was not recorded on the production record for breakfast during the week of review. The specific types of fruit offered must be included to document this component was planned and served. Please include the type of fruit on breakfast production records.

Milk Recipe

If it becomes too time- or labor-intensive to record milk usage by type on production records, you may consider using a milk recipe. A milk recipe is documentation of average milk usage by meal (breakfast or

lunch) and grade group. When a milk recipe is on file, **total** milk usage must still be recorded on production records, but the total by each type is not required to be recorded. Milk recipes must be updated twice per year or when you notice that students' preferences have changed. You can find instructions and a milk recipe template on our [Meal Pattern Components](#) webpage, under the milk heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk>).

Cereal and Juice on Production Record

Currently, different types of cereal and juice are offered daily at breakfast. On production records, these items are listed as "cereal" and "juice." When items are listed on the menu as a general category, such a variety of cereal or juices, all types of the item need to be listed on the production record.

If it becomes too time- or labor-intensive to record cereal and juice usage by type on production records, you may consider using a recipe, exactly like the milk recipe explained above. If utilizing a cereal or juice recipe, the recipe should be updated twice per year or when you notice that students' preferences have changed. Technical assistance was provided on-site for how to develop these recipes.

Crediting

During the week of review, a doughnut was offered during breakfast. On production records, the Food Service Director credited the doughnut as 2.00 ounce equivalents (oz eq) of grain. The Public Health Nutritionist utilized [Exhibit A](#) to determine crediting since a Product Formulation Statement (PFS) was not available (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). On Exhibit A under Group D, doughnuts (cake and yeast raised, unfrosted) credit as 1.00 oz eq grain for every 55 grams. The doughnut offered at breakfast during the week of review was 69 grams by weight, crediting as 1.25 oz eq grain. This difference in crediting did not result in any insufficiencies for the week of review.

In-House Yield

During the day of review for lunch, eight potato rounds were offered as ½ cup of vegetable. When looking at the potato rounds, eight did not appear to be ½ cup vegetable. The Food Service Director utilized the entry for potato rounds in the Food Buying Guide that was an exact match of the product being offered. The Food Buying Guide states that four of the potato rounds, as described, is equivalent to ¼ cup of starchy vegetable.

To determine if the eight potato rounds were ½ cup by volume, potato rounds were smashed into a ½ cup measuring cup. In order to get a level ½ cup, 10 potato rounds were needed. While offering eight potato rounds is correct according to the Food Buying Guide (FBG), it would be in the best interest of the Food Service Director to conduct an in-house yield study to determine the number of potato rounds and sweet potato rounds that credit as ½ cup by volume.

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the next regularly scheduled Administrative Review. An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG (e.g. 175 count apples). [Specific and verifiable procedures](#), which must be followed for an in-house yield study, are available on the DPI SNT website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf>).

Salad Bar Portioning Utensils and Signage

Planned, controlled portion sizes are essential for compliance with meal pattern requirements and dietary specifications. Because the vegetables on the salad bar are included as part of the reimbursable meal, portion sizes of at least 1/8 cup each should be communicated to students. Portion sizes can be communicated to students with signage showing what the intended portion size is or by using portioning utensils for the intended portion size. Remember, raw, uncooked leafy greens credit as half the volume served in their fresh forms. For example, if the intended portion size is ¼ cup, consider including a photo of what 1/4 cup of romaine (1/8 cup creditable dark green vegetable) looks like or an appropriate portion utensil for 1/4 cup of romaine.

Grain-Based Desserts

As a reminder, no more than 2.00 oz eq of grain-based desserts can be offered per week at lunch. Grain-based desserts that are whole grain-rich can count towards the grain component, but grain-based desserts that are not whole grain-rich (made with more than 50 percent enriched grains) cannot count towards the grain component. Grain-based desserts contribute towards the weekly grain-based dessert limit regardless of whether they are whole grain-rich or not (e.g., a slice of cake made with enriched white flour cannot credit towards the grain component, but it counts towards the grain-based dessert limit for the week in which it is served).

As a reminder, Exhibit A specifies what types of grain items are considered grain-based desserts at lunch and what items are allowed to be offered at breakfast. Please see the footnotes of [Exhibit A](#) in order to identify these specific grain items (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>).

Resources

Breakfast Participation

Breakfast participation at Highland School District is low. We encourage you to consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break district-wide to aid in increasing student participation. Mid-morning models tend to work well in middle or high school environments where they have a passing time that would allow students to grab a meal between classes. This could be set up in the cafeteria or with mobile carts in the hallways.

DPI SNT's [breakfast resources webpage](#) has information about the different breakfast service and financial models for your reference (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>). If you ever have questions about breakfast models or would like ideas to increase participation, please contact the Breakfast Specialists listed on the bottom of the [School Breakfast Program](#) webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>).

Weekly Nutrient Calculator

The Weekly Nutrient Calculator can be used to analyze calories, saturated fat, and sodium values weighted over the week. When analyzing nutrients, remember that the values must be weighted according to popularity (how the menu planner plans for each item to be selected). This tool can quickly show both high and low menu items, as well as high or low days on the menu, making it quick to determine which days could be mixed and matched throughout the month. This tool can be found on the [Menu Planning](#) webpage under 'Menu Planning Tools' (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Training

Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [training webpage](http://dpi.wi.gov/school-nutrition/training) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training).

DPI also conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. Information, including dates and locations, will be posted on the DPI [training](http://dpi.wi.gov/school-nutrition/training) webpage as they are scheduled (http://dpi.wi.gov/school-nutrition/training).

Findings and Corrective Action Needed:

❑ **Finding #1:** While signage was present for breakfast and lunch, the signage for both meals did not include the required statement that ½ cup fruit, vegetable, or combination must be selected under Offer versus Serve. Please add a statement to your current signage that states the student must take at least ½ cup fruit, vegetable, or combination.

If you are interested in ordering free signage, please visit the [Team Nutrition](http://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

Examples of signage can be found and printed from our [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Corrective Action Needed: Submit a picture or PDF of new or supplemental signage that has been posted. *Completed on-site. No further action needed.*

❑ **Finding #2:** While all meals observed during lunch were reimbursable, point-of-service (POS) staff should complete a training on Offer versus Serve (OVS). At the beginning of the school year, POS staff were given a sheet of paper that explains three components must be selected and one of them must be ½ cup fruit, vegetable, or combination. It would be beneficial for POS staff to complete a more in-depth training on OVS.

OVS training can be completed any way Highland School District sees fit. There is an [Offer versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) webcast on DPI's website that can be used for training, if desired (https://dpi.wi.gov/school-nutrition/training/webcasts#ovs).

Corrective Action Needed: Please submit a signed training roster confirming that POS staff at Highland School District completed a training on OVS.

❑ **Finding #3:** Recipes are utilized for all menu items. Standardized recipes are needed for mashed potatoes and beef taco meat served during the week of review. The mashed potatoes recipe is taken from one of the many recipes on the mashed potato box. The beef taco meat recipe is a quantity recipe that has been edited but does not accurately reflect ingredients and processes used at Highland School District.

Corrective Action Needed: Submit standardized recipes for mashed potatoes and beef taco meat served during the week of review. *Completed on-site. No further action needed.*

❑ **Finding #4:** Salad bar items do not have a planned portion size. Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size. Because

the salad bar vegetables are part of the reimbursable meal, portion sizes of at least 1/8 cup each should be communicated to students.

Corrective Action Needed: Submit one week of completed salad bar production records for lunch with planned portion sizes for all items.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant address financial topics with the Business Manager including the agency's Child Nutrition Program report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](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](#) 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 “Ala Carte”, 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 would also be included here. This is also called, “nonprogram foods.”
- 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 a food expenditure.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>)
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, the revenues and expenses were not allocated to all respective categories--costs for WSDMP program milks as well as revenue transfers to nonprogram foods to cover deficit.
Corrective Action Needed: Please resubmit your 16-17 Annual Financial Report with revenues and expenses broken out by program and category. To do this, you will need to contact [Jacque Jordee](mailto:Jacque.Jordee@dpi.wi.gov) at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update.

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 \$2.69.**
- 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'](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf) 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 [memo](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf) from DPI (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf).
- Refer to the most recent [guidance memo](https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf) 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) under Paid Lunch Equity (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Findings and Corrective Action: Paid Lunch Equity

No findings.

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).

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

- 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).

Resources

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

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- ❑ **Finding #1:** The Nonprogram Foods Revenue Tool has not been completed for the current school year.
Corrective Action Needed: Provide a completed tool for Highland, using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).
- ❑ **Finding #2:** The alternate food selections offered to students with negative balances are not charged to the student. Fund 50 cannot absorb this cost.
Corrective Action Needed: Please provide a statement of how Highland School District will be covering these costs going forward.

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.

Processes for complaints

- **Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.**
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** Incorrect nondiscrimination statement in use on posted menus, website menus, menu boards and the quarterly newsletter.
Corrective Action Required: Please correct newsletter and website statements and submit a scan or screen shot of the corrected statement. Posted menus and menu boards corrected onsite, no further action necessary.

- ❑ **Finding #2:** District does not have a process for processing complaints.

Corrective Action Required: Please send a copy of the district's complaint procedure.

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.

Smart Snacks in Schools

Commendations

The Food Service Director is very knowledgeable about the Smart Snacks regulations. The Food Service Director had printouts from the Alliance for a Healthier Generation Smart Snacks Product Calculator of the foods sold on the snack cart daily. All vending machines were compliant and the vending machine with Gatorade was shut off until 30 minutes after the school day. Thank you for your hard work to bring competitive foods and beverages into compliance.

Technical Assistance

Fundraisers

There are two situations by which an organization may sell foods and beverages to students during the school day.

1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards:
 - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
 - b. Exempt fundraisers cannot occur in the meal service area during meal times.
 - c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser.

Fundraiser Tracking

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

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations. 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>).

Resources

Final Rule

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>).

Smart Snacks Product Calculator

We recommend using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage to assess product compliance (<https://dpi.wi.gov/school-nutrition/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.

Findings and Corrective Action Needed:

Finding #1: The Scooby-Doo fruit snacks were the only item found to be non-compliant because >35% of the total weight of the package was sugar.

Corrective Action Needed: Submit a written statement explaining how this item will be brought into compliance with Smart Snacks regulations.

Finding #2: Highland School District holds food fundraisers during the school day. It is uncertain whether all items sold are compliant or non-compliant. The principal keeps track of the fundraisers.

Corrective Action Needed: Submit a written statement explaining how Highland School District will ensure all food and beverage fundraisers are compliant, whether it is through compliant products or compliance to the exempt fundraiser rules.

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.

- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: New Food Service Director Hiring Requirements

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](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: Include 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

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

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). 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](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- 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.

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.

- Guidance for [creating food safety policy](https://datcp.wi.gov/Pages/Programs_Services/FoodCode.aspx) can be found on the DPI website (https://datcp.wi.gov/Pages/Programs_Services/FoodCode.aspx).

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Missing Food Employee Reporting Agreements.
Corrective Action Needed: Corrected onsite, no further action required.
- ❑ **Finding #2:** Missing Standard operating procedures (SOPs) for foods held out of mechanical refrigeration.
Corrective Action Needed: Submit an SOP for Time as a Public Health Control to assigned DPI Nutrition Program Consultant via email.

Buy American

Compliance Reminders

The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- The following products may be exceptions to the Buy American provision: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted in an email.
- What is acceptable to determine compliance on a label? Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected

distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.

- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

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

Findings and Corrective Action Needed:

❑ **Finding #1:** The following products were identified in Highland School District's storage areas as non-domestic. Highland School District does not have a Buy American – Non-Compliant List or SFA equivalent form.

- Canned Mandarin oranges- product of China
- Canned pineapple- product of Thailand
- Onions- product of Mexico
- Cucumbers- product of Mexico
- Mixed peppers- product of Mexico

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

Finding #2: The following products identified in Highland School District's storage did not have proper labeling to identify the country of origin:

- Alfredo sauce mix- IL
- Rice Krispie Treats- distributed MI
- Brown rice- distributed CA
- Light ranch dressing- distributed IL

- French dressing- MA
- Mrs. Dash- distributed NJ
- Canned applesauce- distributed MI
- Marinara sauce- packed in CA
- Baked beans- TN
- Strawberries- packed in CA

Technical Assistance, No Corrective Action Needed: In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the above section for sample certification language. This will be treated as technical assistance for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

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.
- There are additional record retention rules for CEP. “LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.
- 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.

Findings and Corrective Action: Reporting and Recordkeeping

No findings.

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.

Summer Meals

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

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

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

Findings and Corrective Action: SBP and SFSP Outreach

- ❑ **Finding #1:** Summer Food Service Program Outreach not being done.
Corrective Action Needed: Please provide a statement of how the district will accomplish SFSP outreach.

Wisconsin School Day Milk Program (WSDMP)

Comments/Technical Assistance (TA)/Compliance Reminders

The reviewer would like to commend the district for correctly calculating the price of the milk by using a weighted average.

- 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

No findings.

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!