

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

School Food Authority: Iowa-Grant School District

Agency Code: 25-2646

School(s) Reviewed: Iowa-Grant High School

Review Date(s): 4/3/18-4/4/18

Date of Exit Conference: 4/4/18

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

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

General Program Reminders/Updates:

GOALS

- 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](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

SOCIAL MEDIA

- Submit photos to the School Nutrition Team to be posted on the DPI SNT Facebook page, Twitter page or Instagram page. Send photos to Dana Colla at dana.colla@dpi.wi.gov.

SNSDC TRAININGS

- The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer in Green Bay, Wausau, Rice Lake, Madison and Milwaukee. There will be emails sent in the coming months regarding the trainings available at these locations. You may also check back on the [School Nutrition Team training](https://dpi.wi.gov/school-nutrition/training) webpage (<https://dpi.wi.gov/school-nutrition/training>).

Appreciation/Commendations:

Thank you to the Superintendent, Bookkeeper, Food Service Director, Food Service Staff, Secretaries and District Staff for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. 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.

Thank you for all that you do to feed the students healthy meals!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations

- Applications were determined in a timely manner. Each application was signed off on and dated by the Determining Official. The official's organization of the requested benefits information made it easy to review.
- Direct Certification is run early and often which is a best practice. Great work!
- Applications needing clarification were followed up on by the Determining Official and noted on the applications.
- Benefit Issuance list is very detailed, updated as needed, and includes all necessary information.

Technical Assistance/Compliance Reminders

- 206 eligibility determinations were reviewed; 0 errors were identified.

Disclosure

- For any staff that has access to students' eligibility status that isn't within the School Nutrition Office (i.e. IT Department, Principals, Secretaries) they must sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This is to protect the students from any overt identification. 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>).
- These staff members that have access to student eligibility status need to have Civil Rights training annually as well.

Transferring Students

- If a student had a free or reduced price meal eligibility at his/her prior school district, the school can provide a copy to the district the student is transferring in to.
- The start date of eligibility is the date the Determining Official reviews and determines the application, signing and dating it.

Categorical Eligibility vs. Other Source Categorically Eligible

- Categorical Eligibility is defined as when a household submits an application that indicates a 10 digit case number for Foodshare (SNAP), W-2 Cash Benefits (TANF) or FDPIR.
- Other Source Categorically Eligible students are students that are homeless, migrant, runaway or foster.
- This information is found on page 10 of the [17-18 SY Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Verification

Comments/Technical Assistance/Compliance Reminders

- Verification began October 2, as the sample size determined 2 applications had to be verified.
- Both households responded in a timely manner and were verified correctly.
- DPI template letters and the tracking form were used.
- Verification process was completed prior to the November 15 deadline and letters were mailed out in October after receiving all verification documentation.

Verification Collection Report

- Include the number of categorically free eligible applications and students on the Verification Collection Report in Section 4.
- Categorically Eligible students are those reporting a 10 digit case number on an application listing they are receiving Food Share, W-2 Cash Benefits, or FDPIR.

Meal Counting and Claiming

Commendations

The Breakfast and Lunch claims for February were done correctly with no errors.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all staff at Iowa Grant School District for the cooperation during this Administrative Review. We appreciated the staff and Food Service Director's willingness to ask questions and to learn.

Comments/Technical Assistance/Compliance Reminders

Meal Pattern

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line (both the main line and the salad bar line) needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements for each component. Review the [Meal Pattern Tables](#) for guidance on how much of each component to offer to the students every day and over the course of the week (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>)

Fruit Component

High School students must be offered 1 cup of fruit daily. There was a daily fruit shortage at lunch for the week of review. On Friday 2/16 only ½ cup applesauce was offered to students in the main line and only ¾ cup was offered in the salad bar line. It is strongly encouraged that a ½ cup spoodle be added to the fruits offered on the salad bar. This makes it easy for students to take a full ½ cup and it also makes it easy for the point of sale staff to recognize serving sizes and be confident that the student took the minimum required amount of ½ cup fruit (or vegetables) under Offer vs Serve.

Meat/Meat Alternate component

Meat/meat alternates (m/ma) offered on the salad bar far exceeded the recommended weekly maximum of 12 ounce equivalents (oz eq). This means that dietary specification were likely exceeded. The meat/meat alternate options that are offered on the salad bar contribute extra calories, saturated fat and sodium and should be more closely monitored. It was discussed, if possible, to put each meat/meat alternate in a pc cup and limit how many the students can choose from. It was suggested that each cup credit the same amount of meat/meat alternate (for example, each cup would contain 1 oz eq meat/meat alternate or each cup would contain 2 oz eq meat/meat alternate). Include signage about how many students would be able to take. If each cup credits as 1 oz eq m/ma, then students may take two. If each cup credits as 2 oz eq m/ma then each students can select one cup.

Another way to control the serving sizes of the meat/meat alternates on the salad bar is to add standardized serving utensils (scoops or spoodles, not tongs) to each food item offered. After the crediting is calculated for the meat/meat alternates offered, determine what size scoop or spoodle

would provide that amount. The addition of signage will help monitor how much of each item a student can take. This ensures that students take the correct amounts and it also makes it easy for the point of sale staff to recognize serving sizes and be confident that the student took the minimum amount to meet meal pattern requirements for a reimbursable meal.

Grain Component

High School students must be offered 2 oz eq of grain daily. There was a daily grain shortage at lunch on the Main line on Wednesday, Thursday and Friday during the week of review which led to a weekly shortage.

-On Wednesday only the chicken nuggets were being credited, the mac and cheese on the menu was considered an extra. The chicken nuggets only credited as 1 oz eq of grain

-On Thursday, insufficient crediting documentation was provided for the hot dog bun. Unable to determine crediting for this product.

-On Friday 2/16 the dinner roll credited as 1.75 oz eq grains.

Grains must be Whole Grain-Rich

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. This means that the first ingredient in the ingredient list will be a whole grain (eg, whole wheat, whole corn etc). The term “made with whole grains” can be deceiving and doesn't necessarily mean that a product is whole grain-rich. Always look at the ingredient list and if the first ingredient is enriched flour, or wheat flour (it must say whole wheat to be considered a whole grain) then it is not a whole grain-rich product.

Grains that are not whole grain-rich cannot be credited toward the grain component. The following grain products being used are not WGR: French Bread, Hospitality sugar frosted flakes, and Chef Pierre Blueberry Muffins.

USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

If the SFA can demonstrate a hardship in procuring, preparing or serving a compliant WGR product that is accepted by students, an exemption can be requested for that specific product. Review the August 23, 2017 memo, “[School Meal Flexibilities for School Year \(SY\) 2017-18](#)” for more information on the exemption process and complete the [Whole Grain-Rich Exemption Request](#) form. Note that until an exemption approval has been received, WGR products must continue to be served (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf>).

Vegetable Subgroups

When multiple serving lines are used (the main line and the salad bar line) each line must meet the weekly vegetable subgroup requirement. This ensures that a student is able to take a reimbursable meal every day in any line they may choose.

Crediting Documentation

Acceptable crediting documentation was not available for the products listed below. Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting. Please provide crediting information for these products by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the product(s). If proper documentation cannot be obtained, you should discontinue using these products for school meals. More information about crediting documentation can be found on the

[Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

- **Hamburger bun and hot dog bun**- documentation was unclear. Portion sizes were different.
- **Tony's Breakfast Pizza scramble** - product spec sheets do not tell how the product credits towards the meal pattern.
- **Uncrustables** - because this is a processed product, a PFS or CN label is needed to credit towards the meal pattern.
- **Diced ham** - crediting documentation was not provided.
- **Mini cinnamon rolls** - a manufacturer spec sheet was provided and this does not explain how the product credits towards the meal pattern.

Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

- The High School breakfast production records did not contain all the necessary information. Continue to work with all staff members to record planned number of servings, planned serving sizes, actual number of reimbursable and non-reimbursable (adult) meals served.
- The High School salad bar production records need to be more thoroughly completed with actual participation numbers broken out by reimbursable and adult meals. Planned serving sizes need to be documented in correct volume and weight measures. Remove any items that you do not offer.

Additionally, technical assistance was given on how to fill in serving sizes appropriately on all production records (breakfast, lunch and salad bar). Fruits and vegetables credit towards the meal pattern in volume measures (such as cups or spoodle/scoop sizes) they should be recorded this way on the production sheet to minimize any confusion in regards to how much was served. Onsite, the reviewer and the food service director weighed out some food items to show the difference between using a 2 oz scoop and the actual weight of the product in that scoop. Begin to write the planned serving size of fruit and vegetables in volume measures or by specifying the scoop size (eg, 2 oz spoodle or ¼ cup).

Grains and meat/meat alternates, instead, are credited using oz eq which is a measure of weight. Onsite we verified that a 2 oz spoodle of turkey does not equal 2 oz of weight. Additionally, processed products with added water, other fillers, sugars, milk and/or breading will not credit the amount that they weigh. We discussed that a 4 oz cinnamon roll does not credit as 4 oz eq towards the meal pattern due to the addition of other ingredient other than true flour. We reviewed Exhibit A and how to use the baked weight of the product to assess how it would credit towards the meal pattern. And we discussed the importance of requesting a product formulation statement and/or CN label to verify meal pattern crediting.

Another useful aspect of product records is that they help the menu planner with forecasting. It was noted that throughout the week of review the forecasted amount for each day of the salad bar was 50 servings. But based on your actual participation, which only averaged about 16 meals, you do not need to continue to prepare that many servings. Production records are intended to be useful data that your staff can use to adjust the amount of food to prepare based on historical participation rates.

The same was noted for lunch. An average of 156 servings were forecasted, yet the average participation was 98. For example, on Monday during the week of review 164 servings were planned and for many items there were 10- 30 servings leftover. Next time the number of planned servings

should be adjusted to reflect this, to reduce the amount of food you make, which will in turn reduce food waste and likely reduce food cost.

Visit the Production Record webpage for more information on what is required to be documented on production records. In addition, you will find many [production record templates](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) for breakfast, lunch, and salad bars (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Signage

The National School Lunch Program regulation requires that schools identify what components make up a reimbursable meal. When implementing Offer versus Serve (OVS), schools must also identify what a student must select in order to have a reimbursable meal.

- Lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination of fruit and vegetable. Technical assistance was provided to add this statement to the current sign.
- Breakfast signage should list the three components and the four items (at a minimum) offered, and must communicate to students that under Offer versus Serve, they must select at least three food items, one of which must be at least ½ cup of fruit, vegetable, or a combination of fruit and vegetable. It was also discussed to add signage to the service line that would identify what each item counts as (e.g., one or two items) and how many items the student can take of each.
- Add signage to the salad bar that says what is required that students take to have a reimbursable meal. We discussed using pictures of ½ cup portion sizes of the vegetables that don't easily fit into a ½ cup spoodle. For example, it takes 6 baby carrots to equal a ½ cup serving of vegetables or 6 whole cherry tomatoes equals ½ cup serving of vegetables. This provides your point of sale staff and those determining reimbursable meals a gauge to accurately identify reimbursable meals and those trays that may be lacking in fruit and/or vegetables.

Samples of menu signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Child and Adult Care Food Program (CACFP)

Iowa Grant School District does serve pre-k students. Since their meals are served separate from the other age/grade groups, they must be served the updated CACFP meal pattern.

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. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

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).

Training

DPI conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. This year we will be in Milwaukee, Madison, Green Bay, Rice Lake and Wausau. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. The following classes are recommended for lead workers and menu planners:

- Meal Pattern: The Whole Enchilada
- Offer versus Serve

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).

Menu and recipes ideas

[USDA's What's Cooking? recipes](https://whatscooking.fns.usda.gov/) include nutritional and crediting information. They are a great resource to use in child nutrition programs. Please note, even though USDA calls these standardized recipes, they are not in fact standardized for your school. These recipes must be tried, tested, and adapted to your food service operation (https://whatscooking.fns.usda.gov/).

Visit the [Lunch Box](http://www.thelunchbox.org/recipes-menus/) webpage for additional menu and recipe tools (http://www.thelunchbox.org/recipes-menus/). Moreover, find guidance on what a standardized recipe should include can also be found on our [Recipe Resources and Tools](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Once the Public Health Nutritionist has all corrective action documentation it will 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.

***Please note that on future Administrative Reviews (AR), repeat violations may result in fiscal action.*

Finding #1: Daily fruit shortage during the week of review at lunch.

Corrective Action Needed: High School students must be offered at least 1 cup fruit. Complete and submit new production records for the week of review that indicates that this shortage is resolved. Additionally, complete a separate [Menu Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-9-12.doc) for the main line and the salad bar at lunch for the week of review (February 12-16) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-9-12.doc). Completion of two menu planning worksheets will satisfy the corrective action requirements for many of the following findings. Refer to the [Menu Planning Worksheet Instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf) for information on how to fill it out (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf).

Finding #2: Excessive and uncontrolled meat/meat alternate on the salad bar; non-standardized (tongs) serving utensils used.

Corrective Action Needed: submit a statement that explains your plan to limit the amount of meat/meat alternate that students can select on the reimbursable salad bar line. In addition, by completing a menu planning worksheet for the salad bar for the week of review ensure totals do not exceed too much over the recommended maximum of 12 oz eq per week.

❑ **Finding #3:** Daily grain shortage on main line at lunch.

Corrective Action Needed: Submit a statement that indicates your plan to meet the daily minimum grain requirement for High School, which is 2 oz eq grain. If you choose to offer a different item, submit the nutrition facts labels and ingredient list for the product(s). Additionally, when you complete the menu planning worksheets make the necessary changes to reflect the changes in your menu.

❑ **Finding #4:** Non-whole grain rich items offered on the main line at lunch and at breakfast.

- The French bread offered on Monday at lunch
- Hospitality sugar frosted flakes at breakfast
- Chef Pierre Blueberry Muffins at breakfast

Corrective Action Needed: Find different products that are whole grain-rich and submit the nutrition facts labels and ingredient lists for each one. You may choose to fill out the [Whole Grain-Rich Exemption Request](https://docs.google.com/forms/d/e/1FAIpQLSeU2Ib9zEJTHCzwQk1xm0IV7nz8nIKATkLku6tX-Dh3Xijptg/viewform) form (https://docs.google.com/forms/d/e/1FAIpQLSeU2Ib9zEJTHCzwQk1xm0IV7nz8nIKATkLku6tX-Dh3Xijptg/viewform). Submit a statement that states your plan of action, whether finding a new product and/or completing the exemption request form.

❑ **Finding #5:** Insufficient weekly vegetable subgroup quantity on the main line. Only $\frac{3}{8}$ cup Dark Green and 1 cup Red/Orange were offered over the course of the week. It is required to offer at least $\frac{1}{2}$ cup Dark Green and 1 $\frac{1}{4}$ cup Red/Orange.

Corrective Action Needed: When completing the menu planning worksheet for the main line add additional servings of Dark Green and Red/Orange, ensuring that the weekly requirements for each subgroup are met.

❑ **Finding #6:** Missing beans/peas/legumes subgroup at lunch on the salad bar line. Students who select the reimbursable salad bar line are not offered the vegetables on the main line. For this reason, they did not have access to the beans/peas/legumes subgroup during the week of review. Offer this subgroup on your salad bar a few times per week to meet the weekly requirement of $\frac{1}{2}$ cup.

Corrective Action Needed: When completing the menu planning worksheet for the salad bar line add the beans/peas/legumes subgroup, ensuring that the weekly requirements are met for this vegetable subgroup.

❑ **Finding #7:** Insufficient crediting documentation was provided for the following products.

- Hamburger bun and hot dog bun.
- Tony's Breakfast Pizza scramble.
- Uncrustables
- Diced ham
- Mini cinnamon rolls

Corrective Action Needed: Request a product formulation statement and/or CN label from the manufacturer for each of the above-mentioned products and submit these documents.

❑ **Finding #8:** production records missing information

- The High School breakfast production records were did not contain all the necessary information. Continue to work with all staff members to record planned number of servings, planned serving sizes, actual number of reimbursable and non-reimbursable (adult) meals served.
- The High School salad bar production records need to be more thoroughly completed with actual participation numbers broken out by reimbursable and adult meals. Planned serving sizes need to be documented in correct volume and weight measures. Remove any items that you do not offer.

Corrective Action Needed: Complete one week of production records, making sure all the above mentioned information is filled in, for the main line and the salad bar for the week of review (February 12-16).

❑ **Finding #9:** Signage does not state what students need to take as part of the reimbursable meal.

Corrective Action Needed:

Lunch signage - Include the following statement: Build a complete meal by selecting foods from at least 3 groups, including a ½ cup fruit, vegetable, or a combination of fruit and vegetable.

Breakfast signage - Include the following statement: Build a complete meal by selecting at least 3 items, including a ½ cup fruit, vegetable, or a combination of fruit and vegetable.

Salad Bar signage - Create signage for your salad bar line displaying visually what a ½ cup serving looks like for the vegetables (e.g., carrots, broccoli florets, cherry tomatoes etc.) and appropriate serving sizes for the meat/meat alternates offered on the line.

Submit photos or copies of the signage.

❑ **Finding #10:** Additional Offer vs Serve training is needed for anyone involved with the preparation, service and/or determination of reimbursable meals.

- [Offer vs. Serve](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html) (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html)

Corrective Action Needed: Watch the training webcast and submit a training log with the date the webcast was viewed and signature of attendees.

3. RESOURCE MANAGEMENT

Commendations

PLE Tool

- SFA is running the PLE tool correctly and adhering to the required lunch price increases every year by exceeding the necessary 10 cent weighted average increase.
- USDA has not yet released the PLE tool for the 2018-19 SY. Once it is released, you will get an email through the SNT listserv.

Technical Assistance/Compliance Reminders

Second Meals

- It is noted that if a student took a second meal, it was not claimed for reimbursement but the student was charged the adult meal price. Second meals are no longer permissible to be sold because a whole meal would not meet the Smart Snacks requirement. Meal items can be sold separately as non-program foods, if they comply with the Smart Snacks requirements.
- If a student wanted to buy each item separately, you would have to make sure those items meet Smart Snacks standards and are charged the nonprogram price to cover costs. Consider using the DPI Nonprogram Food Price Calculator tool to price out items.
- Extra entrees served the same day as planned on the menu and the following day are exempt from Smart Snacks.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, 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>).
- The SFA currently has a written unpaid meal charge policy in place.

Allowable Costs

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) may be found on the Financial Management webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>). A best practice is to continue to collect on the unpaid meal charges as long as you are able to and the student is still enrolled. If unable to collect, then a transfer is required to Fund 50 from Fund 10 or another non-federal fund.
- Per question 15 of the [Financial Q&A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf), student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>). Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50.

Refunds of Student Meal Accounts

- 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>).

Revenue from Nonprogram Foods

Commendations/Comments

- Using the Child Nutrition Program Report from the 16-17 SY and the below USDA Nonprogram Food Revenue Tool, the SFA is in compliance with the Nonprogram Food Revenue regulation.

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at the school district include: Adult Meals, Extra Entrees, Extra Milk, A la Carte, and Catering.
 - The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#), located on the SNT 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>).

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

- The [Menu Raw Food Costing Tool](#) is an excellent tool to cost out your reimbursable meals and extra entrees (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw-food-costing-tool.xls>). It is also helpful in completing the [DPI Nonprogram Food Price Calculator Tool](#) which will also calculate the USDA Non Program Food Revenue calculation for you automatically (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).
- To ensure you are pricing the extra entrees and a la carte food items correctly to cover your costs, use the Menu Raw Food Costing Tool and the DPI Nonprogram Food Price Calculator Tool.
- At breakfast, uncrustables, muffins, and poptarts are sold as part of the reimbursable meal. This is allowable since they meet meal pattern. However, if a student takes a reimbursable meal and grabs an uncrustable/muffin/poptart, the student should be charged for that extra item.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed for all food service staff involved with the School Nutrition Programs. The PI 1441 form was completed correctly and prior to the October 31 deadline.

Technical Assistance/Compliance Reminders

Civil Rights Training

- Annually, civil rights training must be completed for all staff involved in the school nutrition programs. This includes non-nutrition staff members that may handle the administrative side of the programs.

Local Wellness Policy

Commendations

The SFA has a Wellness Policy in place. Thank you for having a wellness policy on file and working to assure students are on the path for a healthy lifestyle.

Technical Assistance: Local 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. 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).

SFA is required to complete an assessment of the LWP:

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

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

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

DPI's Team Nutrition has developed a toolkit and other resources to assist schools with building their [wellness policy](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). Schools can choose from several standardized language options in the toolkit that comply with USDA's regulations and tailor it to their school needs.

Finding #1: The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf).

Provide a timeline of when you plan to have the policy updated and compliant with the final rule.

The [Wellness Policy Builder](#) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy

(https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1).

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, 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). We recommend using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](#) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records (https://foodplanner.healthiergeneration.org/calculator/).

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

1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards:

- a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
- b. Exempt fundraisers cannot occur in the meal service area during meal times.
- c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Findings and Corrective Action Needed:

- ❑ **Finding #1:** The following products in the school store were found to be non-compliant with Smart Snacks.
- Stauffer’s Animal Crackers - not whole grain-rich
 - Nabisco Chips Ahoy Thin Crisps Bake Chocolate Chip Snacks - not whole grain-rich
 - Nabisco Oreo Thin Crisps Bake Chocolate Wafer Snacks - not whole grain-rich

Corrective Action Needed: Submit a statement that explains your plan to discontinue the use of these items. *Corrected onsite, no further action is required. Thank you!*

Professional Standards

Comments/Commendations

The Bookkeeper and Food Service Director share the majority of the program duties.

The Food Service Manager is doing a good job making sure staff are getting their required training hours throughout the school year, that pertain to their job duties. The Food Service Director attends SNSDC classes to stay up to date on the regulations. Nice work!

Technical Assistance

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

- ❑ **Finding #1:** Trainings are being tracked for each staff member involved with the School Nutrition Programs. However, the training logs are missing each employees' date of hire, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff).

Corrective Action Needed: Update the tracking tools to include this information. **Submit a copy of the updated tracking tools.**

Food Safety and Storage

Commendations

- It was evident during meal observation that staff members are well-trained on food safety procedures and effectively implement the food safety plan.
- A site-specific food safety plan was available at the reviewed school. It was clear that the plans are reviewed and updated regularly.
- Temperature records were well-kept, detailed, and available at the reviewed site.
- The food safety plan contained all required documentation including the equipment list, a list of the process 1, 2, and 3 foods, and site specific standard operating procedures.

Findings and Corrective Action

- ❑ **Finding #1:** The most recent Food Safety Inspection was not posted at Iowa-Grant High School.

Corrective Action Needed: Post the most recent Food Safety Inspection on the kitchen door facing the cafeteria or in the school office for the public to view. **Submit a statement in writing this has been completed.**

Buy American

Technical Assistance/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.

More information on this new requirement, including a tool to assist with tracking noncompliant 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>).

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All documents pertaining to the School Nutrition Programs 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. In other words, keep all documents for 3 years plus the current school year.

School Breakfast Program (SBP)

Comments

- At the beginning of the school year, the SFA notifies families of the availability of breakfast through the public release, posting menus and school newsletters.

Summer Food Service Program (SFSP) Outreach

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round.

USDA would like 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>)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. 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>).

Feel free to contact Amy Kolano with any questions regarding the Summer Food Service Program. Her phone number is (608) 266-7124. Her email address is amy.kolano@dpi.wi.gov.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program

Commendations

- The claim for the 2016-17 school year was correctly consolidated and claimed for.

- Consider exporting the monthly edit checks into an excel spreadsheet to add the milk served rather than manually adding the milk served.

Findings and Corrective Action

- ❑ **Finding #1:** The WSDMP contract on file is outdated.

Corrective Action: Complete a new WSDMP contract and send to the consultant for review.

- ❑ **Finding #2:** The milk served to students for the WSDMP is not from milk produced in Wisconsin. Refer to question 12 of the [WSDMP FAQ](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf>). All or part of the raw milk used by the milk processor must be produced in Wisconsin.

Corrective Action: Contact your milk distributor to verify where the milk is produced. **Submit a statement from the milk distributor as to what the percentage of raw milk is from WI.**

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 your students' success.

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



With School Nutrition Programs!