

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

School Food Authority: Hurley School District

Agency Code: 26-2618

School(s) Reviewed: Hurley High School

Review Date(s): 4/17-4/18/19

Date of Exit Conference: 4/18/19

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.

- The [Child and Adult Care Food Program \(CACFP\)](#) helps provide funding for nutritious meals and snacks served to children and adults receiving day care. The CACFP also provides funding for meals served to children and youths residing in homeless shelters, and for snacks provided to youths participating in eligible after school programs. **At-Risk Afterschool Meal Programs are community-based programs that offer enrichment activities for at-risk children and teenagers, after the regular school day ends, can provide free snacks and suppers through CACFP.** For more information see [the DPI Community Nutrition team webpage](https://dpi.wi.gov/community-nutrition/cacfp) (https://dpi.wi.gov/community-nutrition/cacfp)
- [Child and Adult Care Food Program \(CACFP\) Information Sheet](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_information_sheet.pdf) (https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_information_sheet.pdf).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at the Hurley School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness and willingness of the staff to make changes to meet school nutrition program regulations. The DPI review team is confident that the Hurley 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

One hundred fifty-eight (158) eligibility determinations were reviewed, three (3) errors were identified.

Free and Reduced Price Meal Applications

- **Applications must be reviewed in a timely manner. An eligibility determination must be made, the back of the application completed & signed by the Determining Official, 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.

Annual Income

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

Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically. **If done through software, please check that the income levels are updated each year after July 1.**
- **The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either.** The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>).

Household Size Box

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

Incomplete Applications

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

Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program

official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.

- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to 3 outlets:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Limited English Proficiency (LEP)

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

Direct Certification

- Direct Certification electronically matches your student file to a state database of students in families enrolled in FoodShare, W-2 Cash Benefits, FDPIR, Medicaid or Foster Care.
- A child or other household member's receipt of benefits from an Assistance Program automatically extends eligibility for free or reduced benefits to all children who are members of the household. [7 CFR 245.6(b)(7)] Foster child benefits do not extend to other students in a household.
- SFAs and schools operating a Special Provision must conduct a data match between State records and student enrollment records at least once annually [7 CFR 245.6(b)(1)(v)].
- As a reminder, you are required to complete a full enrollment direct certification run 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.
- Hurley had a 1.9% certification error rate. More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA.

Disclosure

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

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** The household size box on 2 applications did not match the number of household names reported on the application.

Corrective Action Needed: Provide a statement of understanding that going forward, all applications will be reviewed to ensure names on application match household size box **and** record the date that application information is verified on the **SFA-1** form and send completed SFA-1 form.

- ❑ **Finding #2:** One application had income annualized.

Corrective Action Needed: Provide a statement of understanding that going forward, all applications will not have income converted to annual unless more than one frequency of income is reported.

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

Verification

Comments/Technical Assistance (TA)/Compliance Reminders

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within three days. When a benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** Incorrect sample size chosen for verification. Standard sample size is 3% of approved applications, on file as of 10/1, selected from error-prone. A total of 23 applications were on file as of October 1st; 3% of 23 is .69 and must be rounded up to nearest whole number: one. Three percent of all applications (including denied) were selected.

Corrective Action Needed: Verifying Official and Confirming Official to watch the [DPI Verification webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#verif) (https://dpi.wi.gov/school-nutrition/training/webcasts#verif), submit email proof of quiz and a statement of understanding regarding selecting sample size.

- ❑ **Finding #2:** Verifying Official did not sign applications selected for verification. Confirming official did not sign one of applications selected for verification.

Corrective Action Needed: Provide a statement of understanding regarding the roles and requirements of the officials involved in the verification process.

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

□ **Finding #1:** The DPI Schools Directory and the claim for reimbursement list only 2 schools in the Hurley School District: #80 ES and #60 HS. Individual site/school edit checks must be used for each school for the reimbursement claim. Currently a separate edit check is in use for the K4 students, who are enrolled in the elementary school, #80, which then is manually added to/combined with the rest of the ES for the claim.

Corrective Action Needed: Remove the separate edit check in Wordwarre for the K4 students and combine those counts with the rest of the Elementary School. **Also** correct/clarify titles at top of edit check to clearly define meal counts in those columns. Send copies of corrected edit checks for April.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Sincere thanks to the school food service staff at Hurley School District. We thoroughly appreciate your time and efforts not only in preparing for this review, but also in all that you do to ensure the students have nutritious meals every day. All of the food service staff and administrative staff were very welcoming and helpful while we were on-site.

Thank you, also, to the Food Service Director for continually working with DPI on program improvements throughout the school year leading up to the on-site review and for the continued efforts during the on-site review. We very much appreciate all that you do for Hurley School District!

Comments, Technical Assistance, and Compliance Reminders: Meal Pattern

Comments:

During the onsite visit, state agency personnel were approached by high school students who shared feedback on the school meals programs, including portion sizes and running out of food. The Public Health Nutritionist reviewed production records for the main meal service line for April 2019 in addition to the month of review, which contradicted reports of running out of entrees. An alternate entree is planned, offered, and served daily in addition to the main entree.

However, production records for the salad bar for the April 2019 and for the review period confirmed reports of running out of food, including fruits and vegetables from the red/orange and other vegetable subgroups. Running out of food creates negative experiences with and perceptions of the school meals programs.

Technical assistance (TA) was provided, encouraging the food service director and school nutrition professionals to ensure students of Hurley School District (grades K-12) have equal access to fresh fruits and vegetables on the salad bar. Continue to work on forecasting, making available those fresh fruit and

vegetable selections preferred by students, and consider both refreshing the salad bar periodically between the lunch service periods and having spare fruits and vegetables on hand that can quickly be set out if/when other items sell out.

Prior to school year 2018-19, excessive portion sizes and free second or third entree servings were offered daily in the Hurley School District. Since bringing portions and servings into with lunch meal pattern requirements, the District has received negative feedback from students and from parents. Prior to and during the onsite review, the food service director shared negative feedback and expressed concerns to the PHN, who provided technical assistance via telephone and email. TA prior to the onsite review focuses on managing student expectations while bringing portion sizes into compliance. The following strategies were shared with the FSD and incoming School Superintendent to create positive impact on student perception of school meals:

- Provide improved signage that conveys appropriate portion sizes of menu items to students.
- If budgetary constraints and board policy allow, consider making the fresh vegetable bar unlimited.
- Work to improve the visual quality and variety of meals served by adjusting menu items to consider color, variety, and presentation.
- Get students involved. Eliciting comments and feedback (such as: "Vote for the salad bar veggies, ballots due by the end of the week!") as well as promoting student involvement (such as creating a taste testing panel for new recipes) are other options that can bolster student support for school meal programs by providing students a sense of ownership in food choices.

Second or third portions:

Students in the Hurley School District were commonly given seconds and thirds, free of charge, in prior school years. These extra servings were planned overages, with extra foods prepared with the intent of providing additional servings. This practice has decreased during the current school year, but it does happen, related to over-forecasting and was noted during onsite observation. This was also found and noted in the 2015-16 Administrative Review: *"Seconds of most menu items were available to all students at both breakfast and lunch. When second portions of entree items are offered and students are not charged an a la carte price, the calories, saturated fat, and sodium of these portions must be included in the weekly averages for dietary specifications (calories, saturated fat, and sodium). It is encouraged to discontinue the practice of offering second portions free of charge to students on a regular basis. This complicates production planning and increases both food cost and waste. If students are still hungry, entree items can be offered and charged as an [a la] carte price. Offering seconds can also lead to a sanitation issue as we saw a student return to the line with a dirty tray and a serving spoon touched the tray and then was returned to the serving pan. Per staff members, students often take more than they can eat. Limiting access to free seconds can help teach students to respect food in that students should be encouraged to take what they can eat and fill up on fruits and vegetables. Another problem encountered with offering seconds every day is staff report they sometimes run out of food and then students eating later do not have access to the items which have run out. This can lead to meal pattern compliance issues."*

Discontinue the practice of offering second or third servings free of charge to students. **When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly averages.** The cycle menu currently in use does not consider the increased dietary specification load from second and third portions and could be out of compliance if adjusted to include second and third servings. Please note that any entree served as part of a reimbursable meal is exempt from Smart Snacks general and nutrient standards if it is sold day-of or the following day; therefore, these extra servings may be offered and sold as an a la carte item without impacting the weekly dietary specifications.

Student hunger is a primary concern for the Hurley School Board. With school-wide support, consider expanding programming to include the a Second Chance Breakfast Program and/or Afterschool Snack Program, which provide access to healthy foods for your students. Additionally, according to [The School Day Just Got Healthier Fact Sheet: Calories in School Meals](https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf), there are no specific maximums for fruits or vegetables (<https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf>). Schools may allow greater amounts than the required minimums by offering self-service or allowing seconds servings of fruits and vegetables. Additional offerings do count towards the weekly calories limits, but because fruits and vegetables are generally lower in calories, they can be excellent sources for satisfying meals and sustaining energy. USDA policy memorandum [SP 41-2014](https://fns-prod.azureedge.net/sites/default/files/cn/SP41-2014os.pdf) also states that with time-limited lunch periods and increased amount of fruits and vegetables offered as part of the meals, some students may be inclined to save some items for consumption at a later time (<https://fns-prod.azureedge.net/sites/default/files/cn/SP41-2014os.pdf>). There is no federal prohibition of this practice, and Food and Nutrition Services (FNS) encourages it as a means of reducing potential food waste and encouraging consumption of healthy school meals. For food safety concerns, this practice should be limited to only food items that do not require cooling or heating, such whole fruit, cereal, or packaged crackers.

Second Chance Breakfast:

Hurley School District has a snack time mid-morning. This is an opportune time to utilize Second Chance Breakfast (SCB), where students who did not purchase a reimbursable breakfast during the traditional before-school breakfast can purchase a reimbursable breakfast during a mid-morning breakfast break. Offering a breakfast break mid-morning will allow those students who were either unable to arrive to school early enough to participate in traditional breakfast or who were not hungry first thing in the morning a chance participate in breakfast. Additionally, incorporating SCB into the regular school schedule can help reduce the stigma often associated with school breakfast; breakfast is no longer seen as something solely for those who are economically disadvantaged - it is simply a part of the school day, just like school lunch. More information on SCB as well as breakfast financial models and helpful menu tips can be found in our [Serving Up a Successful School Breakfast Program](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf) guide (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf>).

Training:

Anyone involved with the United States Department of Agriculture (USDA) School Meal Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free and reduced meal applications, meal pattern, and record keeping requirements.

Travel and meal expenses are allowable food service expenses. Information on upcoming trainings can be found on [DPI's Training Page](https://dpi.wi.gov/school-nutrition/training#up) (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast Page](https://dpi.wi.gov/schoolnutrition/training/webcasts) (<https://dpi.wi.gov/schoolnutrition/training/webcasts>).

Menu planning and Meal Pattern Compliance: Meeting daily and weekly meal pattern requirements.

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. When multiple reimbursable meals are offered, it is

important to make sure that each meal service line meets the daily and weekly meal pattern requirements separately because students are only able to select one entrée option.

At Hurley High School, students typically have access to one main entree or one alternate entree; all students have access to the salad bar, which has a variety of fruit, vegetables and at least 1 oz eq meat/meat alternates (m/ma) daily. Students who select the daily alternate entree, an Uncrustable Peanut Butter and Jelly Sandwich paired with a 1 oz cheese stick (total crediting 1 oz eq grains + 2 oz eq m/ma), are only offered 1 oz eq grain daily and 5 oz eq grain weekly. The minimum requirements for the 9-12 age/grade grouping are 2 oz eq daily and 10 oz eq weekly.

Additionally, two main entree options, Teriyaki Chicken over $\frac{3}{4}$ cup rice (served 3/25/19, credits as 1.5 oz eq grain) and the Walking Taco (served 3/26/19, includes whole grain tortilla chips that credit as 1.75 oz eq grain), were both short of the daily 2.0 oz eq 9-12 age/grade group minimum requirement. These entrees also contribute to daily and weekly grain shortages. On the hot lunch line, a total of 9.25 oz eq grains were served; 10 oz eq is the weekly 9-12 age/grade group minimum weekly requirement.

For week of review, there was a missing vegetable subgroup (Bean/Pea/Legume). The Superior Foods stir-fry vegetable blend, served 3/25/19, included snap peas, which are incorrectly credited as Beans/Peas/Legumes. Snap peas credit as *other* vegetable. This serving still counts towards the daily vegetable requirement and the weekly *other* vegetable requirement, but does not count towards the Bean/Pea/Legume weekly vegetable subgroup requirement.

It may be beneficial to use our Menu Planning Worksheets to assist with ensuring that all available entree items meet daily and weekly requirements. These may be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage, under the Menu Planning Worksheets heading (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools).

Printed Menus: The monthly printed breakfast menus are festive and inviting. However, they are somewhat unclear, grouping the fruit and milk components with the main entree option and separating the alternate entree, implying that the alternate entree does not also come with access to fruit and milk (which is not the case). Continue to work with staff to update menus to more accurately reflect daily offerings. If space is an issue, consider using a blank space on the menu to relay information about daily offerings such as: “choice of milk, fruit juice, and fruit offered daily” to free up space for entree options.

Production Records and Standardized Recipes: Production records are intended to be useful tools to record information prior to production, during production, and following production. Production records submitted for the review period contained all necessary data and were filled out completely. However, the SFA would benefit from continued improvement. TA provided prior to the review and during onsite review to help improve recording on production records. Please continue working with staff members to further improve production records by being more specific with items served (instead of “fruit juice” or “Ardmore juice,” list out the specific type of juice offered: “Orange Juice, Ardmore, 4 oz” to aid in tracking and future planning) and omit unnecessary or unused items from the production record template for further ease of use.

Crediting information recorded on the production records was not consistently in agreement with crediting information on the supporting documentation, such as Child Nutrition (CN) labels, product formulation statements, standardized recipes, or the Food Buying Guide. Including meal pattern

contributions for specified grade groups on production records is not required, though it must be documented and available for staff. An example of this discrepancy from the week of review is the Uncrustables Peanut butter and Jelly sandwich, which credits as 1 oz eq m/ma + 1 oz eq grain, but is listed as 1.5 oz eq m/ma + 1.0 oz eq grain.

Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements. Standardized recipes exist but could use some updating to more accurately reflect what is happening in the kitchen. Technical assistance was given prior to and during onsite review to improve the recipe standardization process, including updating recipes to reflect product currently in use, appropriate portioning tools, and detailed ingredient lists. Continue to work towards recipe standardization, and use all resources available to you. Visit our [Recipe Resources and Tools webpage](https://dpi.wi.gov/school-nutrition/nationalschool-lunch-program/menu-planning/recipes) for additional information (<https://dpi.wi.gov/school-nutrition/nationalschool-lunch-program/menu-planning/recipes>). A few recipes from week of review could use some fine-tuning, for example:

- Breakfast Sundae - portion serving utensil (listed as #16 scoop) is incorrect.
- Walking Taco recipe - portions shown on the recipe are not reflective of current practices and products being used.
- Breakfast Sausage Sandwich - ingredients have been adjusted and products added, but the recipe has not been completely updated.

Dietary Specifications: Full sodium or full-fat foods Currently, various high-sodium and full-fat condiments are being used in standardized recipes and common food offerings. A few examples include Bar-B-Que Sauce, some salad dressings and soup broth/bases. While these foods do not credit towards the meal pattern, they must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium), which may make it very difficult to stay within the dietary specification limits if these “extras” are consistently offered on a routine basis. Occasional use of such foods is allowable and can be a nice incentive for participation for menu items with historically low sales, however frequent use of high-sodium, full-sodium, and full-fat foods is strongly discouraged and does not align with the intention of Child Nutrition Programs to help students develop healthy eating habits. This issue was addressed extensively in the sodium portion of the 2015-16 Administrative Review Nutrient Analysis: *“The current sodium target for K-12 breakfast is 540 milligrams (mg) or less, based on a weekly average. The nutrient analysis conducted on the December 2015 week exceeded this target by 296 mg at breakfast, coming in at 836 mg. Tips for reducing the sodium content of meals are below.*

- *Many of the food items offered on the menu are processed foods that tend to be higher in sodium. Manufacturers are working to reduce the sodium content of processed foods. Preparing more food items in-house may help control sodium. Cook items like pasta, rice, and vegetables without added salt and use herbs, spices, and salt-free seasoning blends to increase flavor of prepared foods.*
- *Try limiting high sodium breakfast entrees to one or two times per week. The high sodium entrees during the December week were the omelet, the breakfast burrito, and the pancake on a stick. Note that the cottage cheese being used is not high in calories but it [is] high in sodium comparatively. The Corn Chex was also high in sodium.*
- *When offering higher sodium breakfast entree options, limit the portion to one each. This makes a big difference when looking at the average weekly calories and sodium content of menus.*
- *Balance foods high in sodium with low-sodium foods. For example, include fresh fruits and vegetables on the menu when processed foods are planned.*
- *Canned vegetables, soups, luncheon meats, and condiments can be high in sodium. To determine the best selection, compare labels or product specification documents.*

- *The USDA is helping schools implement the sodium requirement by offering low-sodium products through USDA Foods. The sodium content in most cheese products has been reduced, and there is wide availability of vegetables and meat without added salt.*
- *Encourage consumption of fresh fruit and white milk (chocolate milk tends to be higher in sodium than white milk)."*

Additionally, nut-butter sandwiches are offered daily. Use of nut butters can significantly contribute to calories, sodium, and saturated fat. This issue was addressed in the 2015-16 Administrative Review Nutrient Analysis: *"Nut butters such as peanut butter tend to be high in fat and calories. At breakfast, consider limiting how often peanut butter is offered. At lunch, consider swapping out the peanut butter sandwich option on some days for other options like a lean deli turkey sandwich."*

Signage: General The main serving area at Hurley K-12 school is decorated with fun and creative signage and a wonderful handwritten daily menu. However, most of the signage is generic, not clearly conveying the ½ cup fruit, vegetable, or combination requirement. It would be beneficial to add further signage to help students build a reimbursable meal, particularly near the Point of Sale (POS) where there is limited signage. A simple reminder of the ½ cup fruit, vegetable, or combination requirement could improve customer flow at POS, where many students were sent back to fulfil the ½ cup fruit, vegetable, or combination requirement.

As a reminder, any new signage posted must be visible to students and indicate the offered components in each meal and tell students what they must select in order to make a reimbursable meal. The breakfast signage must list the three components and the four items offered, and must communicate to students that under Offer versus Serve (OVS), they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination. The 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 and/or vegetable, or a combination. Signage examples can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) web page (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Signage: Salad Bar Because the vegetables on the garden bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. [Salad Bar Signage Template](#) can be found on our [Signage](#) webpage, under the heading Additional Signage Resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>; <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

MEAL PATTERN AND NUTRITIONAL QUALITY FINDINGS AND CORRECTIVE ACTION

Meal Pattern Finding #1: Daily and Weekly Grain Shortages at lunch. The daily minimum requirement for grain was not met for each day of the review period (alternate lunch entree, a peanut butter and jelly sandwich, credit as 1 oz eq grains, 2 oz eq is the minimum daily requirement). Going forward, this item must be adjusted or bundled with another grain item so that at least 2.0 oz eq is offered each day to meet the daily minimum grain requirement and 10 oz eq weekly requirement. Additionally, two hot line entrees were planned in a way that would not meet the 2.0 oz eq daily minimum grain requirement: ¾ cup rice served Monday, 3/25, (credits as 1.5 oz eq) and Tuesday, 3/26, whole grain tortilla chips (credits as 1.75 oz eq). Adjusting these entree items to meet daily minimum requirements would also bring the weekly grain

requirement into compliance. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Meal Pattern Finding #2: Missing Vegetable Subgroup - Beans/Peas/Legumes. No Beans/Peas/Legumes were served during the week of review due to inaccurate crediting (snap peas credit as *other vegetable*). **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Meal Pattern Findings 1 & 2 Complete and submit menu planning worksheets for the 9-12 age/grade group outlining planned portion sizes for all components at lunch for week of review, which meet both daily and weekly minimum requirements. Additionally, please submit a brief written statement detailing the changes that will be made to bring the alternate entree into compliance. Include any additional crediting information for new products or recipes such as Child Nutrition (CN) labels, Product Formulation Statements (PFS), or USDA product information sheets.

Instructions for completing Menu Planning Worksheets:
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf>)

9-12 Menu Planning Worksheet, lunch (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc>)

Lunch Meal Pattern Table, for reference on daily and weekly requirements
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>)

Meal Pattern Finding #3: Standardized Recipes. Considerable clarification from the FSD and information provided on production records allowed recipes used for week of review to be credited towards the NSLP, however the recipes are confusing and do not reflect all of the current processes in the kitchen.

Required Corrective Action: Meal Pattern Finding #3 Please update and submit the following recipes listed below, ensuring that each recipe lists all information necessary, updated ingredients, appropriate portioning tools, and serving sizes for a single portion as well as recipe yield information such as total number of portions.

- Breakfast Sausage Sandwich
- Breakfast "Sundae"
- Walking Taco

Meal Pattern Finding #4: Signage. The current signage, while visually appealing, does not clearly convey the ½ cup fruit, vegetable, or combination requirement necessary for a reimbursable meal.

Required Corrective Action: Meal Pattern Finding #4 Update and post signage that clearly explains to students how to build a reimbursable meal, including the ½ cup fruit, vegetable, or combination requirement. Please submit a photo of posted signage.

Meal Pattern Finding #5: Second and Third Servings. Students are currently allowed to take second and third servings of hot entree items. This finding was also noted in the 2015-16 Administrative Review.

Repeat findings during subsequent Administrative Reviews may trigger a nutrient analysis and may be subject to fiscal action.

Required Corrective Action: Meal Pattern Finding #5 Please submit a written statement detailing the SFA's policy on second and third portions.

SMART SNACKS

Technical Assistance and Compliance Reminders: Smart Snacks

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>).

Vending: All foods (vending machines, school stores, fundraisers, etc.) sold *anywhere* on school campus, between midnight and 30 minutes after the end of the instructional school day, must be in compliance with the "Smart Snacks" regulations. This includes vending machines.

- Recommended best practices suggest that a vending company routinely provide the SFA with an up-to-date list of products and nutrition information for compliance review.
- If the SFA chooses to sell non-compliant items in vending machines, the machines must be non-operational between midnight and 30 minutes after the end of the instructional school day.

SMART SNACKS FINDINGS AND CORRECTIVE ACTION

Smart Snacks Finding 1: Hurley School District has a relatively small snack sales program. Nearly all of the items are Smart Snack compliant; however, the Nabisco 100 calorie cookie packs were identified as non-compliant while onsite. A product must meet one of the general standards: be whole grain rich, have a fruit, vegetable, dairy product, or protein food as the first ingredient, or be a combination food with at least $\frac{1}{4}$ cup fruit and/or vegetable. The Nabisco cookies list enriched flour as their first ingredient and are therefore not whole grain rich.

Required Corrective Action: Smart Snacks Finding #1 Submit a statement detailing what will be done with this product to comply with the Smart Snack regulations.

BUY AMERICAN

Comments/Technical Assistance : Buy American

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

- There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:
 1. Date
 2. Name of product
 3. Country of origin
 4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product e. Distribution- record the reason the distributor carries the non-domestic product
 - e. Other- explain
- You may record additional information if you find it beneficial.
- Many products do not list country or origin or simply have information such as “marketed by” or “distributed by,” which makes identifying compliance or non-compliance with the Buy American provision challenging. If no country of origin is identified on the label, then 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 accepted within an email.
- More information on the Buy American requirement as well as a suggested non-compliant tracking tool template can be found on the [Buy American webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- Products without country of origin labels should also be tracked or verified through the distributor that they are indeed Buy American compliant. Examples identified onsite include:
 - Mission Pride Mixed Fruit - no Country of Origin Label

BUY AMERICAN FINDINGS AND CORRECTIVE ACTION

Buy American Finding #1: No Buy American tracking procedure was in place at time of review. Six products were identified as Buy American non-compliant:

- Dole Pineapple, canned: from the Philippines
- Bountiful Harvest Mandarin Orange Segments, canned: from China
- Bountiful Harvest Sliced Olives, canned: from Portugal
- Apple & Eve fruit juice, boxed: from USA, China, and Argentina
- Tomatoes, fresh produce: from Mexico
- Cucumbers, fresh produce: from Mexico

Required Corrective Action: Buy American Finding #1: Develop and implement Buy American Non-compliant Product List for tracking non-domestic products that includes all necessary information. *Please provide a copy of the updated form that will be used and include any non-compliant products currently in storage.*

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant address financial topics with the Authorized Representative 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 report was changed starting with the 2016-2017 SY and 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 "nonprogram foods", report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
 - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is

actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

Allowable Costs

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

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](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:** ‘17-‘18 AFR the USDA foods value is not included in both revenue and expenses, allocated to Food, in NSLP.
Corrective Action Needed: Please make manual corrections to the ‘17-‘18 Annual Financial Report and send updated report to reviewer. Corrected on-site, no further action needed.

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.

- 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).

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](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) 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](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) from completing the USDA Nonprogram Food Revenue tool (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf).

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the minimum pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student

reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

Resources

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

Findings and Corrective Action Needed: Nonprogram Foods Revenue

- ❑ **Finding #1:** Second entrees are offered to students which are not part of the reimbursable and are considered nonprogram foods. Because of this, these entrée costs may not be absorbed by the non-profit school food service account. Either the items need to be charged to the students at nonprogram food prices (covering all the costs—food, labor, other and profit) or the items need to be tracked and a transfer of funds made from non-federal sources into the food service account for the full cost (food, labor, other and profit) of items offered.
Corrective Action Needed: 1. Please submit a plan as to how these nonprogram second entrée costs will be covered at the Hurley School District next school year and beyond. 2. Also, begin tracking the number of second entrees served, beginning 4/22/19. Submit a copy of a ledger showing a transfer from the General Fund to Fund 50 for the retail value of the number of entrees served from 4/22 until the end of the school year.
- ❑ **Finding #2:** Revenue from milks provided to paid students in the Wisconsin School Day Milk Program is allocated to the WSDMP. This is nonprogram revenue.
Corrective Action Needed: Manually correct the ‘17-‘18 AFR indicating the revenue being removed from WSDMP and allocated to the nonprogram foods revenue. **Corrected on-site, no further action needed.**
- ❑ **Finding #3:** DPI Nonprogram Foods Revenue Tool completed incorrectly and therefore not able to determine compliance with USDA nonprogram foods revenue rule.
Corrective Action Needed: Complete the DPI Nonprogram Foods Revenue Tool and submit to reviewer.

Indirect Costs

Comments/Technical Assistance (TA)/Compliance Reminders

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

- Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

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.

And Justice for All Poster

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

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

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

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA

meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal prices for student meals (\$0.30, \$1.35, \$1.55, \$0.40 \$2.50, & \$2.75) are visible on the computer screen that can be seen by students; this constitutes overt identification.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five 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:** POS screen presents overt identification by indicating meal price by student eligibility status.
Corrective Action Needed: Correct this. Provide screen shots of corrected sales screens for breakfast and lunch meal sales for free/reduced and paid students.
- ❑ **Finding #2:** USDA Nondiscrimination statement missing from menus, meal information section of district handbook and from district policy #8531: Free and Reduced Meals policy.
Corrective Action Needed: Provide a timeline for updating handbook and district policy #8531 to include full USDA nondiscrimination statement. Add USDA shortened nondiscrimination statement to menus. Corrected on-site, no further action needed.

- ❑ **Finding #3:** Incorrect USDA Nondiscrimination statement in use on the “We Must Check” letter for verification and the Wordware-produced “We Have Checked” letter used in verification.
Corrective Action Needed: Correct the statements on the “We Must/We Have Check/ed” letters and submit to reviewer.
- ❑ **Finding #4:** District does not have a policy/procedure for accepting complaints alleging discrimination in USDA Child Nutrition Programs.
Corrective Action Needed: Provide a timeline for bringing this into compliance.

On-site Monitoring

Comments/Technical Assistance (TA)/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).
- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on our [Community Eligibility Provision \(CEP\)](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) webpage, under the resources for currently participating sites section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

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. Needs content areas for Foods sold outside of the school meals program, Food and Beverage Marketing, & Update and Inform the Public.

Corrective Action Needed: Please provide a timeline for updating your policy to become compliant with the final rule.

Professional Standards

Comments/Technical Assistance (TA)/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation,

food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

- The [hiring standards for SFA directors](#) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: New Food Service Director Hiring Requirements (<https://dpi.wi.gov/school-nutrition/professional-standards>). Please see the DPI Professional Standards webpage for more information.

New Food Service Director Minimum Hiring Standards:

SFA Enrollment under 500: High school diploma (or GED) AND at least 1 year relevant experience in school nutrition.

SFA Enrollment under 2,499: High school diploma (or GED) AND at least 3 years relevant experience in school nutrition.

SFA Enrollment 2,500-9,999: Associate degree (or equivalent) with a related academic major AND at least 2 years relevant experience in school nutrition.

SFA Enrollment > 10,000: Bachelor's degree (or equivalent) in any academic major AND at least 5 years relevant experience in school nutrition.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](#) webpage (<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 #1:** The Food Service Director was hired after July 1, 2015 and does not have the minimum education and/or school food service experience for this SFA.
Corrective Action Needed: Complete the Professional Standards Exemption form and submit to reviewer.
- ❑ **Finding #2:** Training is not being monitored on a tracking tool with all the required elements.
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.

Water

Comments/Technical Assistance (TA)/Compliance Reminders

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

For more information and resources on the water requirement, see our [Water Availability webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/water-availability) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/water-availability>).

Food Safety and Storage

Comments/Technical Assistance (TA)/Compliance Reminders

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

Food Safety Inspections

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

Temperatures

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

Food Safety Plans

- The Food Safety Plan was available for review. 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.

Food Employee Reporting Agreements

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

Storage

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

Time/Temperature Control for Safety (TCS) Food

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

Time as Public Health Control

- When using “Time as a Public Health Control”:
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.

- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Uncategorized menu items into Process 1, 2, and 3.
Corrective Action Needed: Categorize all menu items on chart for Menu Items Categorized by Process 1, 2, or 3 or add column to production record and categorize all menu items. Submit updated chart or one week of production records showing process categorization to assigned Nutrition Program Consultant.
- ❑ **Finding #2:** Standard operating procedures (SOPs) are not site-specific.
Corrective Action Needed: Remove or adapt SOPs to reflect site-specific procedures. Submit updated SOP list from food safety plan to assigned DPI Nutrition Program Consultant.
- ❑ **Finding #3:** No annual food safety plan review completed.
Corrective Action Needed: Review entire food safety plan and update as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review page as an attachment to assigned DPI Nutrition Program Consultant via email.
- ❑ **Finding #4:** Most recent food safety inspection report is not posted in a publicly visible location.
Corrective Action Needed: Post most recent food safety inspection report in location visible to public. Completed on-site, no further action required.

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. Please see [In a Nutshell-Reports](#) for summary of reporting.
- 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.

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

Comments/Technical Assistance (TA)/Compliance Reminders

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

Breakfast Promotion

The breakfast participation in the Hurley School District is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

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

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

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

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

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

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

Summer Meals

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

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snacks

Comments/Technical Assistance/Compliance Reminders

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

6. COMMUNITY ELIGIBILITY PROVISION (CEP)

Comments/Technical Assistance (TA)/Compliance Reminders

- CEP is a 4-year reimbursement option for eligible local educational agencies (LEAs) and schools participating in both the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that wish to offer free school meals to all children in high poverty schools without collecting household applications.
- Single schools, groups of schools, or districts with at least a 40% identified student percentage (ISP). The ISP is established using data from April 1 of the school year prior to CEP implementation.
- To determine the ISP, divide the number of identified students (students directly certified for free meals without the use of a school meal application) as of April 1 by the number of enrolled students as of April 1, and then multiply by 100. The ISP may not be rounded up to qualify.
- It is necessary to maintain all certification documents supporting participation in CEP. REMINDER: the current identified student percentage (ISP) and claiming percentages are approved for a four year cycle. CEP participating schools will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).
- [USDA Community Eligibility Provision guidance](#) has been expanded in memo SP 54-2016 (www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) to allow for the use of one form for both meal eligibility and as an alternative household form to be used in CEP schools. This may alleviate confusion among households and administrative staff at a mixed district. This memo clearly outlines the requirement to cost-allocate expenses back to the district for processing and distributing forms in CEP schools. CEP applications and labor hours involved with processing them cannot be paid for from the nonprofit school food service account.
- There must also be a method to accurately distinguish between forms from students in CEP versus non-CEP households. CEP applications are not subject to verification, independent review of

applications, and the certification and benefit issuance portion of the AR review, nor do these students carry individual meal eligibilities that can extend benefit to other students.

- Please see the [CEP webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) and the [CEP Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-nutshell.pdf) for more information.

Wisconsin School Day Milk Program (WSDMP)

Comments/Technical Assistance (TA)/Compliance Reminders

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5th grade.
- Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one. Counts by attendance is not a reliable counting and claiming method.
- 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.
- Revenue and expenses from paid students who participate in the WSDMP must be allocated to nonprogram foods and not the WSDMP.

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (https://dpi.wi.gov/statesupt/every-child-graduate).”



With School Nutrition Programs!