

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Black River Falls School District

Agency Code: 270476

School(s) Reviewed: Red Creek Elementary

Review Date(s): April 3-5, 2017

Date of Exit Conference: April 5, 2017

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, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the [DPI SNT webpage](#).
- 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, and communications and marketing. For more information go to the [DPI SNT GOALS webpage](#).
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the [DPI SNT Financial Management webpage](#) under the *Unpaid Meal Charges* section.

Appreciation:

Thank you to the staff at Black River Falls School District for the courtesies extended during the on-site review. Thank you for taking the time to respond to the off-site questions as well as pulling records for the on-site portion of the review, being available for in-person questions and for providing additional information when requested. All were very receptive to recommendations and guidance. It was a pleasure visiting Black River Falls School District.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

380 eligibility determinations were reviewed, seven (7) errors were identified. Technical assistance was provided on correct processing of these errors and *Corrective Action* is requested below to address this *Finding*.

While seven (7) errors were noted, the Determining Official (DO) is detail-oriented and organized, two excellent characteristics for processing and distributing meal benefits. Thank you to the DO for being available to answer questions, clarify information and follow-up with households when necessary.

Household Size Box

If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.

If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional Office, any application that does not have this box completed is considered an incomplete application.

Disclosure

SFAs must seek written consent from the household to use information provided on the meal application or through DC for non-food service program purposes, such as athletic or testing fee waivers. Consent must be obtained each school year. A template [Sharing Information Form](#) is located on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

Alternatively, a SFA can ask programs requesting benefit information to have households self-disclose by providing a copy of their [Letter to Households of Approval/Denial of Benefit](#) notification letter. This option is encouraged as it reduces administrative recordkeeping for food service.

A [Disclosure Agreement](#) form should be signed and on file at the SFA for anyone receiving eligibility information to approve students for non-food service program benefits or with access to the meal benefit information. This form can be found on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

Effective Date of Eligibility

SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is received if a process is in place to capture when the application is received. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The DPI SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

The SFA is highly encouraged to consider applying for this flexibility as a safe guard for approving applications in a timely manner.

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. The SFA may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including email. The Determining Official (DO) should document the details of the conversation, 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.

Transferring Students

SFAs can share eligibility data with other districts when requested for specific students but are not required to do so, as noted on page 39 of the [Eligibility Manual for School Meals](#).

If a student(s) received free meals via Direct Certification (DC) at a previous SFA, a copy of the original DC run with all names blacked out except for the student(s) requesting free meals should be obtained from the previous SFA. The date of the DC run as well as the match code for the student(s) should be visible to the new SFA. If a student received free meals via application at a previous SFA, a copy of the original application should be obtained. Alternatively, the student(s) can be run individually through DC or complete a new meal application with the new SFA.

Notification Letters

When using non-DPI template letters, the SFA should compare their letters with the template letters and the requirements in the [Eligibility Manual for School Meals](#) to ensure all required information is included. Please see the *Finding* and *Corrective Action* under Verification which addresses the requirement for appeal procedures to be included on notification letters indicating a decrease in meal benefits.

As a reminder, the USDA Non-discrimination Statement *must* be included on all communications with households **and** in the same size font as the most commonly used font in the document.

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.

To assist SFAs in reaching households with limited English proficiency, the DPI SNT provides the Wisconsin-ized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian on the [DPI SNT Free and Reduced Price Meal Applications and Eligibility webpage](#).

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. The benefit does not extend to other household members.

Verification

The SFA completed verification within the designated timeframes. The appropriate number of applications were selected for verification based on Standard Sampling. Documentation indicated a confirmation review took place by the Confirming Official (CO). All selected applications were correctly verified. However, the notification letter indicating a household was receiving a reduction in meal benefits did not include the required appeal rights, as noted in the DPI template [We HAVE CHECKED your application](#) letter. Please see *Corrective Action* below that addresses this *Finding*.

Meal Counting and Claiming

Breakfast was observed on Tuesday, April 4, 2017 at Red Creek Elementary School. Reimbursable meals were correctly identified and claimed. No meal counting errors were observed.

Lunch was observed on Tuesday, April 4, 2017 at Red Creek Elementary School. Reimbursable meals were correctly identified and claimed. No meal counting errors were observed.

The February 2017 claims for reimbursement for the National School Lunch Program (NSLP) and School Breakfast Program (SBP) were reviewed and validated against the SFA's edit checks by school. An over-claim of three (3) paid breakfast meals was noted for the SBP claim for reimbursement, specifically tied to Red Creek Elementary School. Discussions with the Determining Official (DO), who also reviews the monthly edit checks by school, indicated the three (3) meals were tied to a middle school student of the school nurse that, on occasion, eats breakfast at Red Creek Elementary School. As the DO does review the edit checks and has documentation that the figure discrepancies have been validated prior to the claim for reimbursement, no fiscal action will be calculated. However, please see the *Finding* and *Corrective Action* below that requests that the SFA determine how to have all meals pull back to their respective school edit checks. No errors were identified in the NSLP claim for reimbursement.

Finding #1: Seven (7) certification and benefits issuance errors were identified that will be included in fiscal action calculations. These errors are outlined on the SFA-1 form provided on-site. Additional household members in need of correction but not included in fiscal action calculations are outlined on the SFA-2 form provided on-site.

Corrective Action Required: Please follow up with the students/households in error noted on the SFA-1 and SFA-2 forms. Record dates benefits were corrected on each form and submit to DPI. Please note, timely correction of applications is encouraged to limit fiscal action.

Finding #2: The notification letter, used during Verification, indicating a household was receiving a reduction in meal benefits did not include the required appeal rights, as found on the DPI template [We HAVE CHECKED your application](#) letter.

Corrective Action Required: Please submit a summary detailing how the SFA will ensure these appeal procedures are included in future communications regarding a reduction in meal benefits.

Finding #3: An over-claim of three (3) paid breakfast meals was noted for the SBP claim for reimbursement, specifically tied to Red Creek Elementary School. Discussions with the Determining Official (DO), who also reviews the monthly edit checks by school, indicated the three (3) meals were tied to a middle school student of the school nurse that, on occasion, eats breakfast at Red Creek Elementary School. The DO does review the edit checks and has documentation that the figure discrepancies have been validated prior to the claim for reimbursement. However, all reimbursable meals should pull back into their respective school edit checks.

Corrective Action Required: Please submit a summary of how the SFA has adjusted the parameters for pulling edit checks by school to ensure all reimbursable meals are captured.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff for providing documentation prior to the review. Documentation was thorough and well organized. All of my questions were answered very quickly which helped to expedite the process of reviewing meal pattern compliance. Students are offered a menu with nice variety as well as a garden bar daily.

The signage in the cafeteria showing what ½ cup of fruits and vegetables looked like on the tray was great! All of the food service staff at Red Creek were friendly and willing to answering any questions. They did a great job serving the students with positive attitudes and smiling faces.

Comments/Technical Assistance/Compliance Reminders

Production records:

Currently, all required information is not being documented on the production record. The list of production record requirements was provided prior to the on-site review and is available on our website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/production-records>.

- The planned number of servings for each menu item should be documented as well as the actual number of servings prepared.

Weight vs. volume:

Unless an item is physically weighed, the serving size should most likely be recorded on the production records and/or standardized recipe as a volume. Spoodles measure volume, so while it may be labeled a 4 oz spoodle, this actually indicates that it holds 4 *fluid* ounces or ½ cup. It doesn't mean that the serving provided will necessarily weigh 4 oz.

- For the chicken a la king, the recipe correctly states the serving size is ½ cup or a 4 oz spoodle, but the production record lists a 4 oz serving size.

Meal Pattern/Crediting:

Some items such as the chicken fajita meat are credited based on the weight of the serving provided. The school is properly using those weights to determine the volume that must be provided. It is recommended that the volume needed for the desired weight and crediting be documented somewhere (such as on the production record, copy of the CN label/PFS or on a recipe) to aid in menu planning, purchasing and service.

Chicken fajita recipe did not match the serving size listed on the production record. The recipe has 2.46 oz of fajita meat and 0.5 oz of cheese, while the production record had 2 oz of fajita meat and 1 oz of cheese. This has been corrected and the portion size is now 2.46 oz of fajita meat and 1 oz of cheese.

When ensuring the weekly minimum requirements for grain and meat/meat alternate are being met, it is important to consider all entrée options available to students, including alternate entrees and leftovers offered. The entrée option crediting as the least amount would be considered the daily minimum and the sum of each daily minimum determines the weekly minimum. For K-5, the weekly minimum must be at least 8 oz eq of meat/meat alternate and 8 oz eq of grain.

- If staff on-site make substitutions or changes to the menu, they should be reminded to run the changes by the menu planner for approval to ensure all daily and weekly meal pattern requirements are still being met.

When grain items are offered as a side, such as a dinner roll or breadstick, they are available to all students selecting a reimbursable meal. Some days, this results in students having access to a significant amount of grain. For example, on Friday during the week of review, a cheddar stuffed pretzel stick was offered with the chicken nuggets. However, students selecting the breaded Pollock on a bun could also select the pretzel stick, and if taking both, would have had 4.25 oz eq of grain. The weekly maximum for grain ended up being 15 oz eq. It is possible that this would exceed the dietary specifications for the K-5 meal pattern. Therefore, if a large portion of students selecting the alternate entrée are selecting the grain, it is recommended that the planned menu and/or ability to select the grain side be re-evaluated.

Breakfast Participation:

The greatest breakfast participation is typically seen with when alternative service models are used. The Black River Falls School District saw evidence of this with high participation in schools with breakfast in the classroom. Red Creek Elementary is currently operating a traditional, before school breakfast program. Administration and the Food Service Department are encouraged to explore alternative options such as breakfast in the classroom or a second chance breakfast/breakfast after the bell in hopes of increasing participation. This is beneficial both for the increased reimbursement that would be received, but also to ensure that all students have the opportunity to start the day ready to learn.

Training:

Ongoing training is essential to staying informed of school meal requirements. It is strongly recommended that in addition to attending in person trainings (such as SNSDC), you utilize the SNT website for resources, including training webcasts that can be watched at your convenience. A list of all available training webcasts can be found at <http://dpi.wi.gov/school-nutrition/training/webcasts>.

Offer versus Serve

Staff at Red Creek Elementary School were knowledgeable on the requirements of reimbursable meals for breakfast and lunch. All meals selected were reimbursable and correctly claimed.

Finding #4: The menu for the week of February 6-10, 2017 had a weekly meat/meat alternate minimum of 7.5 oz eq. This is short of the weekly minimum requirement for the K-5 meal pattern of 8 oz eq for meat/meat alternate.

*** Please note that on future Administrative Reviews, repeat violations of minimum quantity shortages may result in fiscal action*

Corrective Action Required: Changes to the planned menu were provided. Alternate entrée options will now be as follows:

- Monday- Uncrustable/cheese stick
- Tuesday- Grilled Cheese
- Wednesday- Chicken Patty on Bun
- Thursday- Deli Sandwich on Bun
- Friday- Pollock Fish on Bun

Also, a WG cookie (0.5 oz eq) will be offered with the meatball entrée and uncrustable on Monday. *No further action is needed.*

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Access to the SFA's Child Nutrition Report, which provides a compilation of meals claimed, reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, is described in the document [Viewing the Child Nutrition Report](#). The DPI Aids Register is also available to track all program deposits made to the SFA's account as well as the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. The Aids Register is available on the DPI SNT [Financial Management webpage](#). Both resources are also accessible from the [Online Services webpage](#).

Annual Financial Report

In SY 16-17, all revenues including reimbursements and student payments and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. Please note there are additional categories than in previous years:

- **NSL** - schools participating in the National School Lunch Program.
- **SB, SBSEVERE** - both regular School Breakfast and Severe Need Breakfast.
- **SK-NSL, SK-NSLAE** - both After School Snacks and Area Eligible Afterschool Snacks.
- **SMP** - Special Milk Program.
- **Grants** - all grant awards and expenditures.
- **WSDMP** - Wisconsin School Day Milk Program.
- **EN** - Elderly Nutrition.
- **Nonprogram Foods** - all Nonprogram Foods (including: a la carte items, adult meals, milk only, extra entrees, vended meals sold under a joint agreement, catered meals, vending machines, etc.)
- **CACFP** - daycare and supper meals claimed under Child and Adult Care Food Program.
- **SFSP** - meals claimed in Summer Food Service Program.

The [new SY 16-17 Annual Financial Report instructions](#) are located on [DPI SNT Financial Management webpage](#).

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](#). For a more comprehensive overview, see [SP 58-2016: Unpaid Meal Charges Guidance](#). In addition, 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, as noted in [SP57-2016 Unpaid Meal Charges Guidance](#).

Thank you to the Food Service Director (FSD) for prompt review and update of figures submitted for the Annual Financial Report. A commodity handling charged was omitted from the initial report.

Paid Lunch Equity

The SFA is in compliance with PLE for SY16-17. However, an error in the PLE tool completed in SY15-16 for SY16-17 was noted. The error was discussed and the correct figures were used when starting the PLE for SY17-18. The FSD was provided with a copy of the partially completed PLE tool with the correct figures included.

Revenue from Nonprogram Foods

The SFA flagged for a comprehensive resource management review in the *Revenue from Nonprogram Foods* section as it sells nonprogram foods.

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
- Vending Machines operated by Food Service

All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals nor be absorbed by the food service account. Nonprogram food costs and revenues must be separated from program food costs and revenues. In regards to adult meals, 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, which are outlined in the [Wisconsin Adult Meal Pricing Worksheet](#). SFAs must reassess adult meal prices annually prior to contract submission to ensure student reimbursement is not being used to subsidize adult meals.

At a minimum, the [USDA Nonprogram Food Revenue Tool](#) must be completed yearly. The [DPI Nonprogram Food Revenue Tool/Calculator](#) aids in calculating prices of nonprogram foods and feeds into the USDA Nonprogram Food Revenue Tool to determine compliance with USDA nonprogram food regulations.

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

Figure 1 - Nonprogram Foods Revenue and Costs Ratio

The [Nonprogram Foods Revenue Rule SP 20-2016](#) and the [Nonprogram Foods In a ‘Nutshell’](#) can provide additional guidance and clarification on nonprogram foods.

The SFA was in compliance the USDA Nonprogram Food Revenue Tool as evidenced by completion of the DPI Nonprogram Food Revenue Tool/Calculator for a week in SY16-17.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Non-discrimination Statement

The SFA uses some of the DPI template letters and some letters created internally to communicate information to households about USDA Child Nutrition Programs. While all letters included the USDA Non-discrimination Statement, the SFA is reminded that the statement must be in the same size font as the most commonly used text in the document.

And Justice for All Poster

An “And Justice for All” poster was available and readable at Red Creek Elementary School.

Civil Rights Training

Civil rights training had been completed by those involved with the USDA Child Nutrition Programs at the SFA.

Civil Rights Self-Compliance Form

The Civil Rights Self-Evaluation Compliance form was completed by October 31st.

Special Dietary Needs

All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical practitioner. SFAs may use the [template Medical Statement Form](#) posted on the [DPI SNT Special Dietary Needs webpage](#). This template is also available in Spanish and Hmong. SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner.

School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA still have a completed [Medical Statement Form](#) on file from a medical authority, such as a school nurse, to support the request. These types of accommodations must be made according to the USDA’s meal pattern requirements in order for the meals to be claimed for reimbursement. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are being handled equitably.

Processes for complaints

As a reminder, all verbal or written civil rights complaints regarding USDA Child Nutrition Programs that are filed with the SFA must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. 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. The [USDA Program Discrimination Complaint Form](#) is available to assist in filing these complaints and can be found on the [DPI SNT Civil Rights webpage](#).

On-site Monitoring

The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) established the requirement to conduct on-site monitoring of the School Breakfast Program beginning in SY 16-17. The requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information, see [USDA Memo SP 56-2016](#). The [National School Lunch Program On-site Monitoring Form](#) and [School Breakfast Program On-site Monitoring Form](#) are currently available on the [DPI SNT Administrative Review webpage](#).

Breakfast and lunch monitoring forms were available for all schools in the SFA.

Local Wellness Policy (LWP)

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 of 2010 (HHFKA). The final rule requires SFAs to begin developing a revised local school wellness policy during SY 16-17 and full compliance with the requirements 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 each school complies with the policy.

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. SFAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years (triennial assessment) to determine compliance with the policy, how the policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the triennial assessment, as well as the wellness policy and any updates to the policy, available to the public.

A summary of the requirements can be found at:

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 process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

The SFA's current LWP and proposed LWP were reviewed. The SFA is encouraged to continue with the proposed LWP which contains all of the noted requirements above. To further strengthen the policy, the SFA is encouraged to explore and include [Smarter Lunchroom techniques](#).

Smart Snacks in Schools

All foods (vending machines, a la carte, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the Smart Snacks rule that went into effect on July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>. The Wisconsin DPI allows for two fundraiser exemptions per student organization per school per school year. Exempt fundraisers cannot exceed two consecutive weeks in length and cannot occur in the meal service area during meal time.

Red Creek Elementary School was reviewed in regards to their compliance with Smart Snack regulations. The school was determined to be in compliance with Smart Snack regulations, both in regards to daily food sales and food fundraisers.

Professional Standards

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. 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.

The SFA is in compliance with Professional Standards regulations for the SY16-17. Technical assistance was provided to the FSD to maintain a continuing education log of all staff to determine compliance with the regulation at-a-glance. The continuing education log should include the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff).

Training requirements for all staff are as follows:

Directors	Managers	Other Staff	Part Time Staff
	(20 hrs or more/week)	(less than 20 hrs/week)	
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment. Additionally, in terms of Professional Standards, full time is >20 hours per week while part-time is <20 hours/week.

Water

Water was available at lunch and breakfast via a drinking fountain in the cafeteria along with plastic cups at the Point of Service (POS).

Food Safety and Storage

Food Safety Inspections

The most recent food safety inspection was posted in the kitchen. It is a requirement of USDA Child Nutrition Programs that the most recent food safety inspection be posted in a publically visible and readable location. Thank you for the FSD for her prompt movement of the inspection to a publically visible and readable location.

Food Safety Plan

The food safety plan was available for review.

Temperature Logs

All temperature logs and signed [Employee Health Reporting Agreement](#) were up-to-date and available for review.

Storage

On-site storage areas were reviewed, including the freezer, refrigerator, and dry goods storage room. All were orderly and clean.

Buy American

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in school meal programs as well as supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf. The Buy American provision should be included in solicitations, contracts, and product specifications.

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

SFAs must monitor contractor performance to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. This is accomplished by ensuring the product label designates the United States, or its territories, as the country of origin. Therefore, SFAs must ensure that products delivered comply with any Buy American contract provisions by reviewing products and/or delivery invoices/receipts to identify the country of origin is the United States or its territories. SFAs also need to conduct a periodic review of storage facilities, freezers, refrigerators, dry storage, and warehouses to ensure products comply with the Buy American provision, unless a limited exception has been approved.

The following item were found to be non-compliant during the on-site review:

- Mandarin Oranges – China (Non-compliant product list on file)
- Celery – Mexico
- Cucumbers - Mexico

The SFA should work with its distributor to determine if these products are available domestically. If not, documentation requested in the [Non-compliant Product List](#) should be obtained. Please note, the use of this form is the exception, not the rule. More information on this new requirement can be found on the [DPI SNT Procurement webpage](#). The SFA is encouraged to ask questions on this regulation during their Procurement Review.

Reporting and Recordkeeping

Thank you for completing the required USDA and DPI reports and for maintaining the paperwork in an organized manner. The SFA is meeting record retention requirements for USDA Child Nutrition Programs.

School Breakfast Program (SBP) Outreach

The SFA participates and meets promotion requirements for the School Breakfast Program (SBP).

Summer Food Service Program (SFSP) Outreach

The SFA participates in the Summer Food Service Program and meets promotion requirements for the program as part of participation in the National School Lunch Program (NSLP).

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate webpage](#).

