

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

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**School Food Authority:**

Fort Atkinson School District

**School(s) Reviewed:** Fort Atkinson High School  
and Rockwell Elementary

**Agency Code:** 28-1883

**Review Date(s):** 3/6/18-3/8/18

**Date of Exit Conference:** 3/8/18

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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](http://dpi.wi.gov/school-nutrition/training)).
- The food service director has chosen to pursue a GOALS Certification, which is great! 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.
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Fort Atkinson SD for the courtesies extended to us during the on-site review and for being available to answer questions. The DPI review team appreciates the eagerness of the administrative staff to implement positive changes that align with regulation and encourage students to make healthy choices.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Commendations

The determining official (DO) does a great job. Determinations are accurate, timely, and well documented. 420 eligibility determinations were reviewed, 2 errors were identified. The agency will *not* need to complete independent review of applications, nor will fiscal action be assessed. Keep up the good work!

##### Technical Assistance

If a household submits an application that indicates Other Source Categorical Eligibility, such as Head Start, 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.

##### 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 agency is commended for recently assessing which individuals have access to this information within food service and outside of food service and choosing to further limit those that "need to know". For example, the Food Service Director worked with the IT department to develop an automated software application to obtain point of sale milk counts. This eliminated the need for secretaries in each building to assist in compiling the WSDMP claim.
- 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](#) 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](#) 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:** 2 students were issued benefits in error as noted on the SFA-1 form. A copy of this form was provided to the DO onsite.

**Corrective Action Needed:** For the first application, follow-up with the household to clarify if the student remains the legal responsibility of the state, or household. If legal responsibility lies with the household, the application must be determined by household size and income. For the second application, obtain a copy of the Head Start coordinator list. **Corrected onsite. No further action required.**

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### Verification

No errors. Keep up the good work!

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### Meal Counting and Claiming

#### **Technical Assistance:**

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- Fiscal action will be taken on 4 lunches claimed at the Reduced price rate. Per the edit check, there were 16 reduced lunches claimed at Rockwell EI on 1/10/18 and only 12 eligible. After the SFAs followed-up, it was discovered that the system did not update 4 students from Reduced to Medicaid Free after the direct certification import. Follow-up with your IT department and your software provider to correct this error and to ensure timely updates to the BI list moving forward.

#### Severe Need Breakfast

A school is eligible for Severe Need Breakfast reimbursement if 40% or more of the student *lunches* served at the school in the *second preceding school year* (2015-16 SY to qualify in SY17-18) were served free or at a reduced price. Severe Need payment is made on an individual school basis. Regulations require documentation of eligibility to be maintained on file by the SFA for review. Severe Need breakfast approvals are part of the annual DPI SNT online contract renewal, but the agency must self-elect. The SNT moved to site-based claiming in SY 17-18, so SNB reimbursement will be automated in the 19-20 SY.

### Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #1:** While watching lunch service at Rockwell EI, reviewer observed the cashier entering student names into the system at the beginning of the line from across the cafeteria. The cashier would then confirm the student's name and tray at the end of the line. The agency is not approved to be using a beginning of the line point of sale and this system is inaccurate.

**Corrective Action Needed:** Conduct training with staff, emphasizing the importance of entering the meal into the system at the end of the line where it can be determined that a student has a reimbursable meal. Submit a statement outlining the date the training was completed.

- ❑ **Finding #2:** The SFA misunderstood the criteria required to apply for Severe Need Breakfast (SBP-SN) reimbursement. Breakfast numbers were submitted in the 17-18 SY online contract, rather than lunches. Upon review of lunches served in the 2015-16 SY, Barrie EI does not meet or exceed the 40% (39.39%). All other sites listed as SBP-SN remain eligible. Technical assistance was provided onsite.

**Corrective Action Needed:**

a) DPI will reclaim the difference between severe need and regular breakfast reimbursements at Barrie EI from September 2017-January 2018. Please work with the DPI SNT accountant [jacqueline.jordee@dpi.wi.gov](mailto:jacqueline.jordee@dpi.wi.gov) to submit claim adjustments.

b) Update the online contract to reflect participation in the regular breakfast program at Barrie EI. Also update all other Severe Need Breakfast sites to reflect the correct F, R, and P lunches served in the 2015-17 SY.

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## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to the Director of Student Nutrition and school nutrition professionals at Fort Atkinson School District. We appreciate your time and effort spent preparing for and participating in the onsite reviews. Thank you to the Director of Student Nutrition for sending organized documentation and answering questions prior to the onsite review.

It is great that Fort Atkinson School District is offering students multiple entree options daily at both breakfast and lunch. The daily Rainbow Bar that is offered at the middle school and high school is great way to encourage consumption of a variety of fruits and vegetables. During lunch observation at Fort Atkinson High School, many students utilized the Rainbow Bar while staff kept it full and clean. Thank you to everyone at Fort Atkinson School District for all that you do to provide your students with healthy and appealing meals!

### Comments/Technical Assistance/Compliance Reminders

#### Training

Additional training on Offer versus Serve (OVS) for the staff of the Fort Atkinson School District is strongly encouraged. While staff showed an understanding of this concept during observation, additional training on the difference between OVS at breakfast versus lunch and the many combinations a student may select to make a reimbursable meal is always encouraged. Visit our [Training](#) webpage for an Offer versus Serve webcast that may be used for staff training

(<https://dpi.wi.gov/school-nutrition/training/webcasts#O>). A handout on OVS at breakfast was also provided during the onsite review as a training resource.

### Meeting Daily and Weekly Requirements when Offering Multiple Entrees

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entree option, each entree option offered is viewed as one “line” and therefore needs to meet the daily as well as the weekly requirements. This guidance can be found in the following documents.

### **DPI's [Lunch in a Nutshell](#)**

Each serving line must meet the daily and weekly requirements, including vegetable subgroups, independently. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>).

### **Memo [SP 10-2012 \(v.9\)](#) Questions & Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”**

1. For menu planning purposes, when multiple choice menus are served, how are minimums calculated?

Weekly minimum - example 2: If a grade K-5 school offers a 1 oz. eq. grain item (salad) and a 3 oz. eq. grain item (pizza) every day (and instructs the student to select one option only), the minimum weekly offering is 5 oz. eq. grain (1 oz. eq. x 5 days). This menu would not meet the required weekly minimum for lunch of 8 oz. eq. (pg. 37).

2. When multiple serving lines are used in a school, must each line meet the weekly vegetable subgroup requirement?

Yes, in most cafeteria set-ups. As required in Section 210.10(k)(2), each independent line must meet the daily and weekly requirements (including subgroups), in order to ensure that a child is able to take a reimbursable meal every day in any line they may choose. (pg. 37)

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf>).

The menu planning worksheets, found on the [Menu Planning](#) webpage, may be a helpful tool to ensure that the planned minimum amounts a student has access to daily and over the week will meet the required minimum amounts (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

### Production Records

- Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to consistently record planned usage, actual usage, and leftovers for all menu items. It is also highly recommended to include other factors that may affect meal service, including field trips or weather. Maintaining thorough, accurate production records will aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.
- Be specific on production records about the identity, brand, and description of the items served. For example, list the specific types of cereal offered and include the brand and product number for

items such as chicken patties. There is a wide variation in formulation of the many products that are served in the School Meal Programs. Additionally, fruit sizes (e.g. case count) should also be recorded. Serving products other than those planned may affect how the meal pattern quantities and dietary specifications are being met.

- The total number of purchase units prepared should be included on your production records for each menu item. Technical assistance was given onsite to modify the current production record template to accommodate this information. A list of production record requirements (“Must Haves and Nice to Haves”) and sample production record templates can be found on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).
- Consider adding the number of food items each menu item is being planned as to your breakfast production records. Since breakfast Offer versus Serve is based on food items, this may help to reduce any confusion as to what students may select for a reimbursable meal.

### Standardized Recipes

Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. While detailed standardized recipes were submitted for the week of review and were being used during observation on site, cheese was added to the refried beans offered at lunch and therefore should have a standardized recipe.

### Portion Sizes

- Consider examining some of the portion sizes offered to the K-5 grade group. For example, on the day of observation, the same portion of the Veggie Guacamole Wrap was offered to all grade groups. Large portions may be intimidating for younger students. They may be more willing to try foods when offered in smaller amounts. The same concept may be applied when offering foods from the beans/peas vegetable subgroup. Offering smaller portions of beans multiple times over the week to meet the subgroup requirement may increase student acceptance.
- While students were able to serve themselves from the Rainbow Bar at the high school using 4 oz. spoodles, consider also adding signage communicating what the planned ½-cup portion looks like. For example, a sign indicating that four orange wedges equals ½ cup fruit would have made it clear to students what to take to meet the ½ cup fruit or vegetable requirement.

### Menu

- The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the lunch menus. It either may be listed daily or may be listed in one place on the menu with a statement that a variety of milk is offered daily as part of the reimbursable meal.
- The [USDA Nondiscrimination Statement](https://fns-prod.azureedge.net/sites/default/files/cr/Nondiscrimination-Statement.pdf) must be used on all communications with the public, including web pages. When there is not enough space to use the full statement (i.e., monthly menus), the following shortened statement can be used: This institution is an equal opportunity provider (<https://fns-prod.azureedge.net/sites/default/files/cr/Nondiscrimination-Statement.pdf>).

- A few entrees on the breakfast menu do not explicitly include a grain option, such as the Strawberry Smoothie and the Sausage and Eggs. Consider revising your menu so that students are aware of what will be offered with each entree choice.

### Crediting

- When using a Child Nutrition (CN) label to document meal component crediting, it is important to save the actual CN label from the product packaging. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label. If the original CN from the product packaging is not available, a watermarked CN label may be used for crediting purposes when a Bill of Lading (invoice) for the product is also provided.
- The production records submitted for the week of review contained many crediting errors. Product documentation should be reviewed and production records and recipes should be revised to reflect accurate crediting based on the products currently being used. Accurate recording of meal component crediting will help to ensure that the meals offered meet the meal pattern.
- An item at breakfast is defined as 1.0 oz. eq. grain, 1.0 oz. eq. meat, ½ cup of fruit and/or vegetable, or 1 cup of milk. The oatmeal packets offered on the breakfast menu credit as 0.75 ounce equivalents (oz. eq.) of grain. This oatmeal packet must be bundled with other items so at least 1.0 oz. eq. of grain is offered to meet the daily minimum requirement for grain, and so these items together can be counted as an item for the breakfast meal pattern. Under Offer Versus Serve, four food items must be offered at breakfast, and students must select at least three food items, including ½ cup fruit and/or vegetable to have a reimbursable meal.
- When crediting fruit in a smoothie, it should be based upon the volume of the pureed fruit in each serving. Additionally, pureed fruits, when served in a smoothie, credit as juice and no more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice.

### Weight vs. Volume

- Meat/meat alternate (M/MA) is credited by weight, not by fluid ounces. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving of ground/diced/shredded meat or cheese. Fluid ounces are a volume measure, while ounces are a weight measure. To ensure that students are receiving the adequate amount of meat/meat alternate, weigh the meat/meat alternate, then determine which scoop will hold that weight of meat.
- There was some confusion over the concept of weight vs. volume while observing meal preparation on site. Training on appropriate measurement techniques is recommended for all staff. Additionally, consider updating your standardized recipes to include weight and the corresponding volume measurement for items such as shredded cheese. This may allow for easier measurement by staff when preparing recipes or serving.
- Unless an item is physically weighed, the serving size should most likely be recorded on the production records as a volume. Fruit and vegetable serving sizes should be documented as a volume measure for consistency with meal pattern requirements. For example, mashed potatoes served during the week of review were recorded on the production record with a planned serving size of 3 ounces. This could create confusion over whether the intended serving size should be 3 oz. by weight or 3 oz. by volume and may lead to meal pattern insufficiencies.

### Breakfast Promotion

- It is great to see that Fort Atkinson School District offers the School Breakfast Program. However, schools are using the traditional breakfast service model and have noted that their participation rates are not very high. Fort Atkinson School District and staff may want to consider a change in breakfast model to increase participation.
- Breakfast in the classroom is associated with the highest participation rates, which can be as high as 98 percent of the school's enrollment, and works best in elementary schools. Other service methods, such as Grab 'n Go and breakfast after first period, correlate with increases as much as 15-40 percent of current participation. If breakfast is offered in a convenient way for students, they will participate in the program. Additionally, greater participation equates to more students being ready to learn, as well as higher levels of government reimbursement, which results in more revenue for the school.
- Refer to the [Serving Up a Successful School Breakfast Program](#) guide for an in-depth look at the various School Breakfast service models to determine which one(s) may work in your schools. Find additional information on breakfast, including meal pattern and menu planning tools, on the [School Breakfast Program](#) webpage (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>). Please contact our School Breakfast Specialists Tracy Huffman, MS, RDN, CD at [tracy.huffman@dpi.wi.gov](mailto:tracy.huffman@dpi.wi.gov) and Hannah Snider, MPH, RDN, CD at [hannah.snider@dpi.wi.gov](mailto:hannah.snider@dpi.wi.gov) for additional guidance.
- Also, consider promoting the value of a reimbursable breakfast. Educating students on the amount of food they are able to select with a reimbursable breakfast in comparison to the price of just purchasing and entrée or a la carte items may also increase breakfast participation.

### Field Trip Meals

Students on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of potentially hazardous food, establishing a way for collecting meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](#) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

### **Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality**

❑ **Finding #1:** The daily vegetable requirement was not met at lunch on two days during the week of review at Rockwell Elementary. The total vegetable offerings on both days were short of the  $\frac{3}{4}$  cup per day requirement. Only  $\frac{1}{2}$  cup of vegetables were offered on Thursday and  $\frac{3}{8}$  cup of vegetables were offered on Friday.

**Corrective Action Needed:** Submit a written statement describing how you plan to offer the required daily amount of vegetables when these two days appear during the next cycle of the menu, along with product documentation for any added vegetables that cannot be found in the Food Buying Guide. Please also address how you will ensure this insufficiency will be avoided in the future on all menus.

❑ **Finding #2:** There was a weekly meat/meat alternate insufficiency during the week of review for lunch at Rockwell Elementary. A total of 7.5 oz. eq. was offered over the week, which was short of the requirement to offer at least 8 oz. eq. Please reference our [Lunch Meal Pattern Table](#) and the above technical assistance regarding meeting the weekly requirements when offering multiple entree options.

**Corrective Action Needed:** Submit a written statement describing how the weekly meat/meat alternate requirement will be met for this week. Submit product labels and crediting documentation for any new products being offered, along with updated planned portion sizes if applicable.

❑ **Finding #3:** No more than 2.0 ounce equivalents (oz. eq.) of grain-based desserts can be offered per week at lunch. Grain-based desserts contribute toward the weekly grain-based dessert limit regardless of whether they are whole grain-rich or not. A total of 3 oz. eq. of grain-based desserts were offered during lunch for the week of review at the high school:

- Apple Cinnamon Churro: 1 oz. eq.
- Scooby Doo Snacks: 1 oz. eq.
- Fresh Baked Cookie: 1 oz. eq.

**Corrective Action Needed:** Submit a written statement on how you will comply with the 2.0 oz. eq. grain-based dessert limit at lunch each week going forward.

❑ **Finding #4:** Milk is a required component as part of the National School Lunch Program and School Breakfast Program. You must record daily usage by milk type on your production records. Total milk usage by type was not documented on either the breakfast or the lunch high school production records submitted for the week of review.

**Corrective Action Needed:** Submit completed breakfast and lunch production records from the high school for two days of your choice showing that total milk usage by type is being documented.

❑ **Finding #5:** Signage at Rockwell Elementary and Fort Atkinson High School did not contain the requirement that students must select at least ½ cup fruit, vegetable, or combination. Breakfast signage at the high school did not indicate how many food items each menu item was planned as. Additionally, signage at both review sites was either not located near the beginning of the meal line or partially blocked during meal service.

**Corrective Action Needed:** Please add the ½ cup fruit or vegetable requirement statement to your current signage or post new signage containing this statement. Also, add the breakfast food item information to your breakfast signage. Downloadable signage templates are available on our [Signage Resources](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>). Please also relocate your signage at both locations so that it is visible to students near the beginning of the service line. Submit a photo of the updated signage once complete.

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### **Technical Assistance**

As a reminder, expenses related to ‘purchased services’ and ‘other’ should also be allocated to the School Breakfast Program, nonprogram foods, Snack, and WSDMP as applicable. Some purchased service expenses, like Food Safety Inspections should be assigned in full to the NSLP, as these are a requirement of the NSLP.

##### Unpaid Meal Charges

When reminding students about negative meal accounts, reviewer would encourage the agency to be more discrete, by directing all communications to the adults in the family, rather than to the students in the meal service line. Pg. 39 of the [Unpaid Meal Charge Guidance](#) provides suggested alternatives to singling out students. Some actions are discouraged, while others are prohibited.

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##### Paid Lunch Equity (PLE)

The agency is in full compliance.

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##### Revenue from Non-program Foods

The agency is in full compliance.

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### 4. GENERAL PROGRAM COMPLIANCE

#### Civil Rights

##### **Technical Assistance**

##### Nondiscrimination Statement

When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

##### Civil Rights 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.

##### Public Release

All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>).

The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must annually distribute the Public Release to:

- o Local news media
- o Grassroots organizations (local organizations providing services to populations in need)
- o Major employers contemplating or experiencing large layoffs
- o 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.

### 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>)

### SP 26-2017

#### **Q21: Can the Offer versus Serve (OVS) provision be used to accommodate a meal modification?**

**A:** No. Schools operating OVS must ensure children with disabilities have the opportunity to select all required food components for the meal. For example, a child who has Celiac disease or a gluten intolerance must have a choice of a bread/grain item that is gluten-free. The SFA may not use OVS to eliminate a specific food component for a child with a disability; in this case, the SFA must offer a grain substitute for a child who cannot consume gluten.

- 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.

### **Findings and Corrective Action Needed: Civil Rights**

**❑ Finding #1:** The public release was not distributed to the required outlets (e.g., grass roots organizations and local unemployment office). It was submitted to the local news media.

**Corrective Action Needed:** Submit a statement outlining where the public release will be sent at the start of the 18-19 SY.

**❑ Finding #2:** The menu calendar report does not contain the shortened non-discrimination statement.

**Corrective Action Needed:** Include the shortened statement, which is, “This institution is an equal opportunity provider.” Send a copy of the updated template to the consultant.

**❑ Finding #3:** USDA Civil Rights Training was not completed by the Business manager and Authorized Representative. This is an annual requirement for all staff administering any portion of the school meal programs.

**Corrective Action Needed:** Review the USDA Civil Rights Training PowerPoint, which can be found on the [SNT Civil Rights website](#). Send an email with date of completion to the consultant.

### **Local Wellness Policy**

#### **Compliance Reminders**

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The first assessment should be completed within three years of the SFA’s policy being updated, but no later than June 30, 2020 to be in compliance with this rule. Following the assessment, SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA’s LWP compares to a model policy. It is recommended SFAs include an improvement plan upon the results of the assessment.

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## **Smart Snacks in Schools**

### **Commendations**

It is great that Fort Atkinson School District has a policy in place that requires approval of food fundraisers from the Student Nutrition Department and ensures that those fundraisers are being tracked. All foods and beverages being sold to students for consumption during the school day at Rockwell Elementary and Fort Atkinson High School met the Smart Snacks standards. Continue to use the Alliance for a Healthier Generation's [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) to determine if products are compliant (<https://foodplanner.healthiergeneration.org/calculator/>).

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## **Professional Standards**

### **Technical Assistance**

Staff categorized under the title “manager” must receive 10 hours of professional standards training annually.

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## **Food Safety, Storage and Buy American**

### **Buy American**

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

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

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

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

- The following product labeling did not identify a country of origin: canned applesauce, canned corn, and Doritos Top N Go. In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. This will be treated as TA for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

### **Food Safety**

- Part of operating an efficient and safe meal service site includes maintaining tidy storage and prep areas. While watching meal service at Rockwell EI, reviewer noted that freezers, coolers, and dry

storage were disorganized. This is a small space, however improvements can be made. For example, there were personal items kept on cereal boxes and it was hard for the reviewer to identify which food safety plan was current among the many loose papers kept within a milk crate.

- Procedures detailed in the standard operating procedure 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.

### Sharing and No Thank You Tables

Staff mentioned that they may want to implement a 'Sharing' or 'No Thank You' table in the future. This is allowable and DPI no longer requires pre-approval. However, note that there are specific points to consider for safe and responsible implementation for each type of table as outlined below.

#### **Sharing Table**

A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

#### **No Thank You Table**

A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, a designated worker or trained individual must inspect the items for wholesomeness.

**Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.**

#### **Considerations**

1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
4. Parents will be informed in writing.
5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.

8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

### Wholesome Leftovers

Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. "Wholesome" must be defined by the SFA as part of the SOP.

**Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.**

Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

### Monitoring Log

Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

### Findings and Corrective Action Needed: Food Safety, Storage, and Buy American

- Finding #1:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin: Canned Tropical Fruit Salad (Thailand); Frozen Broccoli (Mexico); Bananas (Honduras)

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

- Finding #2:** The most recent food safety inspection report is not posted in a publicly visible location at Rockwell El.

**Corrective Action Needed:** Post the most recent food safety inspection report in location visible to public. Submit photo as an attachment to assigned DPI Nutrition Program Consultant via email.

- Finding #3:** Standard operating procedures (SOPs) for #16 Date Marking and #10 Storing Food are not being followed at Rockwell El. Reviewer also noted that these same issues were cited on Rockwell's most recent food safety inspection report. The SFA is accountable to 7 CFR 210.13 (d), which states: "the school food authority shall ensure that the necessary facilities for storage, preparation

and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.”

**Corrective Action:** Submit a statement outlining the actions taken by the district to correct these issues. Submit a copy of the aforementioned SOPs with staff signatures documenting training has been conducted.

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## **Summer Food Service Program (SFSP) Outreach**

### **Commendations**

The district is doing a great job promoting the Summer Food Service Program. The program is promoted in the local newspaper, business cards are handed out at open house, postings are made to the website, and DPI SFSP promotional materials like door hangers are used. Thank you for doing your part to help close a local hunger gap over the summer months!

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## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Afterschool Snack Program (ASP)**

While reviewing snack program claims, reviewer found that Luther EI is eligible to qualify as an Area-eligible snack site using January site-based claim data. Contract updates were made and approved in March. The district is eligible to claim as an area eligible (non-pricing) site beginning with February’s claim. Claiming for all snacks at the higher free rate in February, does require the district to refund households for any reduced or paid snacks during that month prior to claiming at the higher rate.

#### **Findings and Corrective Action Needed: Afterschool Snack Program**

**Finding #1:** The ASP on-site monitoring review (s) are not completed at Rockwell EI. Each Afterschool Snack Program must be reviewed by the School Food Authority (SFA) two times per year. The first review must be conducted during the first four weeks of each school year.

**Corrective Action Needed:** Conduct a review of the program yet this school year and submit a copy of the completed [on-site monitoring form](#) to the consultant. Submit a timeline outlining when both reviews will be completed in the 1819 SY.

**Finding #2:** The food safety plan for Rockwell EI does not contain a Standard Operating Procedure (SOP) for the Afterschool snack program (ASP).

**Corrective Action Needed:** Include a standard operating procedure specific to afterschool snack. DPI SNT has an [ASP template](#) available that can be modified. Train

all staff with oversight and operation of this program on the SOP. Submit a copy of the SOP and date of training completion.

- ❑ **Finding #3:** Fruits and vegetables are planned as one component, resulting in periodic shortages during the review period. A link to the ASP meal pattern was provided onsite. A full fruit component is  $\frac{3}{4}$  cup. A full vegetable component is  $\frac{3}{4}$  cup. This is different than the NSLP.

**Corrective Action Needed:** Update the planned calendar menu and production records to reflect a full  $\frac{3}{4}$  cup fruit or  $\frac{3}{4}$  cup vegetable when these components are planned to meet one of the required two full components per day. Submit a copy of the updated menu and 1 week of production records for Rockwell EL.

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### Wisconsin School Day Milk Program (WSDMP)

#### **Commendations**

As mentioned at the beginning of this report, the Food Service Director worked with the IT department to create an internal software application, which significantly increased program efficiencies and accuracy at the point of sale and for the annual claim consolidation. Furthermore, this advancement reduced the number of staff needing access to free and reduced data for annual claim consolidation. These efforts are commended.

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

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

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



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