

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Johnson Creek School District Agency Code: 282730

School(s) Reviewed: Johnson Creek Elementary School

Review Date(s): November 7-8, 2017

Date of Exit Conference: 11/8/17

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 at no charge. 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 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, and 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 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations:

Thank you to the Food Service Director, Determining Official, Superintendent, Cooks, Secretaries and staff for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. Everyone was 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations

Applications were very well documented and determined. When the Determining Official needed to follow up with a household, she documented on the applications the new information that she received to support the eligibility status determinations.

Technical Assistance/Compliance Reminders

- 101 eligibility determinations were reviewed; 1 error was identified.

Other Source Categorical

- 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. A new application must be submitted annually to determine whether the student qualifies for free meals or not.

Disclosure

- The information provided by families 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, 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:

- ❑ **Finding #1:** A student receiving free benefits had an application on file originally determined from August 21, 2015 as Foster. There were no court documents on file to support the Foster status and no new application on file for the 16-17 SY or 17-18 SY. The student should have been changed to Paid status during carryover of the 16-17 SY.

Corrective Action Needed: Notify the household, whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. A letter was sent out on 11/7/17. **No further action required.**

- ❑ **Finding #2:** Disclosure agreements have not been signed off on by the Administration and Secretaries that have access to individual eligibility status information. Every staff member that has access to individual student eligibilities and is not the Food Service Director or Determining Official, must sign off on a Disclosure agreement stating they will not disclose any student's eligibility status. A copy of the form can be found on the [Free and Reduced Meal Application and Eligibility webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure), under the Disclosure heading. (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>).

Corrective Action Needed: Have Secretaries and anyone else that has access to individual student eligibility status information sign off on the Disclosure Agreement form. Scan/email a copy of each form signed off on.

Verification

Commendations

Verification was well done and completed in a timely manner. Only one application was Verified. A confirmation review took place and the Confirming Official signed off on this task. The DPI Verification tracker sheet and all DPI notification letters and templates were used for Verification. All forms were thoroughly completed and very organized. The Verification Collection Report was completed prior to November 15 and was completed correctly. Job well done!

Meal Counting and Claiming

Commendations

Edit checks have been completed for each site, the Elementary and Middle School/High School. An edit check was completed for Breakfast and Lunch at each site as well. The edit checks were very well done, organized, and included all required data. The Accuclaim was used to submit the claims.

Technical Assistance/Compliance Reminders

When completing the claim for reimbursement, remember to use the highest number of approved Free and Reduced students, as well as the highest enrollment on a given day during the claiming month. By using the Accuclaim, you can scan each day of the month to find the highest approved Free and Reduced students. The highest enrollment is listed on the bottom of the Accuclaim for lunch, too.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and to the school nutrition professionals of Johnson Creek Elementary School. We appreciate your time and efforts spent preparing for and participating in the onsite review. Documentation was thorough and well-organized. The elementary school kitchen was neat and clean, and the cooks provide exceptional customer service throughout busy meal periods. The Food Service Director is knowledgeable, creative, inquisitive, and receptive to feedback. She recognizes strengths and areas of improvement in the programs she manages.

Technical Assistance and Program Requirement Reminders

Signage

Signage was not posted at breakfast or lunch to show students what constitutes a reimbursable meal. Signage is especially helpful when students are self-serving foods, such as lettuce, baby carrots, and cucumber slices on the garden bar. To better serve students who are still learning to read, consider adding pictures or preparing a model tray with the amounts of vegetables that the menu planner expects the students to take. Signage examples can be found on the [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>). If you are interested in ordering signage from SNT, please visit the [Wisconsin Team Nutrition](https://dpi.wi.gov/team-nutrition) webpage and complete the Resource Order Form (<https://dpi.wi.gov/team-nutrition>). Please ensure signage includes a statement that a student must take at least three full components at lunch or three food items at breakfast, one of which is 1/2 cup fruit, vegetable, or combination.

Weight versus Volume

Use cup volume amounts when recording portion sizes on the production records for fruits and vegetables. This will be the easiest way to make sure the meal pattern is being met. Please ensure weight and volume are not being used interchangeably for crediting purposes. A [portion control webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#pc) (<https://dpi.wi.gov/school-nutrition/training/webcasts#pc>), which describes portion control techniques and explains the difference between weight and volume, is available from SNT. Earn fifteen minutes of continuing education credit by viewing the webcast.

Crediting Orange Wedges

According to the USDA [Food Buying Guide for School Meal Programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (<http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>), one standard 138 count orange credits as 1/2 cup fruit. Therefore, if an orange is cut into quarters, three wedges only equal 3/8 cup and two wedges only equal 1/4 cup. A full orange needs to be selected in order to obtain a full 1/2 cup portion.

Vegetable Subgroups

During the week of review, several vegetables were assigned to incorrect subgroups on production records (e.g. broccoli as starchy, green beans as dark green, and peas as other). Utilize the [vegetable subgroups chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>) for assistance with assigning vegetables to correct subgroups.

Watermarked Child Nutrition (CN) Labels

A CN label with a watermark is used when the CN logo and contribution statement are used on product information other than the actual product carton and is presented as a separate document. Manufacturers may provide schools with a CN label with a watermark during the bidding process or on their websites. Original CN labels on product cartons will not have a watermark. Product information on the CN label with a watermark can be changed. CN labels must be verified and collected from boxes as products are delivered. Once labels have been collected, check when new shipments arrive to determine if crediting towards the meal pattern has changed.

Product Formulation Statements

Any processed product that is not listed in the USDA *Food Buying Guide for School Meal Programs* requires a current CN label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients, based on entries in the *Food Buying Guide*; portion size; statement of contribution to meal pattern requirements; and an original signature

from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson).

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g. pasta with olive oil and herbs). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe produces a consistent quality and yield every time, which is crucial for crediting school food service recipes.

Production Records

Be specific on production records about the identity, brand, and description of the items served. List fruits separately to accurately reflect portion sizes and crediting. For example, during the review period at breakfast, apples, oranges, applesauce, and raisins were grouped on one line. The portion size for raisins is 1/4 cup, crediting as 1/2 cup of fruit; the portion size for apples is 1 each, crediting as 1 cup of fruit. Fruit sizes (e.g. case count) should also be recorded. Several one ounce equivalent grain and meat/meat alternate (m/ma) items and juice were not recorded during the review period.

Smart Snacks Calculator

SNT recommends using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records. As a best practice, staple a complete label with nutrition facts (name of the food item, brand name, nutrition facts, and ingredients) or empty package to the printout.

Corrective Action

- ❑ **Meal Pattern Finding #1:** Daily and weekly minimum requirements for grain and meat/meat alternate (m/ma) were not met for lunch during the review period as a result of four chicken nuggets offered on Wednesday, October 11. Four chicken nuggets credit as 0.75 ounce equivalents of grain and 1.5 ounce equivalents of m/ma, resulting in a 0.25 ounce equivalent daily shortage of grain and 0.25 ounce equivalent weekly shortage of m/ma.

Required Corrective Action: Please submit a statement describing how you will meet the minimum daily requirements going forward. **Per onsite discussion with the food service director, the chicken nugget portion size will be increased from four to five, crediting as 2.00 ounce equivalents of m/ma and 1.00 ounce equivalent of grain. This satisfies both daily and weekly minimum requirement. No further action is required.**

- ❑ **Meal Pattern Finding #2:** Signage was not posted at breakfast or lunch to show students what constitutes a reimbursable meal.

Required Corrective Action: Submit a photo of posted signage, which includes a statement that a student must take at least three full components at lunch or three food items at breakfast, one of which is 1/2 cup fruit, vegetable, or combination.

3. RESOURCE MANAGEMENT

Commendations

The SFA has an Unpaid Meal Charge Policy in place and it has been well communicated with households.

Technical Assistance/Compliance Reminders

Allowable Costs

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our [Financial Management](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>). A best practice is to continue to collect on the unpaid meal charges as long as you are able to and the student is still enrolled. If unable to collect, then a transfer is required to Fund 50 from Fund 10 or another non-federal fund.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).
- As a reminder regarding alternate meals, be sure to keep track of the number of alternate meals you serve throughout the year. Keep track of the food cost, labor, and other expenses as well. Make a transfer from Fund 10 or another non-federal fund to Fund 50 to cover the costs of these alternate meals.

Paid Lunch Equity (PLE)

Commendations

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. Great job running this tool!

Revenue from Nonprogram Foods

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at Johnson Creek include: Adult Meals, A la Carte, Extra Entrees, and Extra Milk.
- Be sure to keep track of all extra milk served and track it as a nonprogram food cost (using the average net dairy cost). Be sure to track the revenue from the extra milk. You will report this on the Annual Financial Report as a nonprogram expenditure (milk cost) and revenue (milk payments).
- All nonprogram food costs 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.

- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

- Using the Child Nutrition Program Report from the 16-17 SY, the SFA is adequately pricing out its nonprogram food prices. The above calculation was used to determine whether the SFA is in compliance or not. Johnson Creek is in compliance with the USDA Nonprogram Revenue Tool.
- It is advised to use the DPI Nonprogram Food Revenue Tool to make sure you are covering your costs for those nonprogram foods, annually or when you get new a la carte products.

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](#) has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices. However, since you are selling different homemade food items to the staff, you should be figuring out the average cost of an adult meal and marking it up to ensure you are covering labor, food, equipment, utilities, or any other costs incurred. Do this to make sure the Adult Meal Price listed on the contract (\$3.80) is sufficient for the cost of the adult meal.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<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>)

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed at the beginning of the school year for all staff involved with the School Nutrition Programs and eligibility statuses. The PI 1441 form was completed correctly and done prior to the October 31 deadline.

Technical Assistance/Compliance Reminders

And Justice for All Poster

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

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. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner 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>).
- 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 have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner 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.

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 are visible on the computer screen that can be seen by students, which constitutes overt identification.

Findings and Corrective Action Needed:

- Finding #1:** Students' meal prices were viewable on the point of sale screen. This is a form of overt identification and is unallowable.

Corrective Action Needed: Configure the software to not show the student meal prices on the point of sale screen. This was completed on site, **no further action required.**

- Finding #2:** The And Justice for All poster was posted in the kitchen. Since the kitchen is not open every hour of the day, the poster needs to be moved to a public space such as the cafeteria or adjacent hallway.

Corrective Action Needed: Post the poster in the cafeteria or on the bulletin board in the hallway. This was completed on site, **no further action required.**

Local Wellness Policy

Commendations

The SFA does have a Wellness Policy in place. It was last updated in 2016 and it is available on the school website.

Technical Assistance/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 2016-2017 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.

Content of the Wellness 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. LEAs 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.
- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

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 process and wellness policy elements](https://healthymeals.nal.usda.gov/school-wellness-resources) (<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>).

SFA is required to make the LWP available to the public and public must be informed of updates to policy (1001) Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform the public about the content, implementation of, and updates to the LWP annually. Your SFA did not notify the public regarding updates to the LWP. SFAs may use a variety of methods to notify the public about the LWP and its updates. This may include mailing flyers, newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification.

SFA is required to inform potential stakeholders of their ability to participate in the LWP (1004) Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain documentation that notifies potential stakeholders

of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of 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>).

SFA is required to complete an assessment of the LWP (1005)

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

SFA required to inform the public of the results of the most recent assessment (1006)

Technical Assistance for 1006, if do not have a policy: 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 your 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 a plan to improve upon the results of the assessment.

Technical Assistance for 1006, if do have a policy: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include a plan to improve upon the results of the assessment.

- ❑ **Finding #1:** SFA LWP meets some but not all requirements as stipulated above (1000)

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule. Submit this via email.

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

The food service director, superintendent, and high school principal set policies surrounding food and/or beverage sales. There are no vending machines on school property. There is an approval process for student organization fundraisers. The elementary school hosted no food or beverage fundraisers during the school day this school year. All reviewed beverages sold a la carte are compliant with Smart Snacks standards.

Professional Standards

Commendations

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 Food Service Director is doing a wonderful job making sure staff are getting their required training hours at the beginning of the school year, that pertain to their job duties.

Technical Assistance/Compliance Reminders

- 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, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- **Annual Training Requirements for All Staff**
Directors: 12 hours
Managers: 10 hours
Other Staff (20 hours or more per week): 6 hours
Part Time Staff (under 20 hours per week): 4 hours
If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action:

- ❑ **Finding #1:** Training is not being monitored on a tracking tool.

Corrective Action Needed: Include all current training hours for each food service employee onto the DPI tracking tool and submit a copy through email.

- ❑ **Finding #2:** The Food Service Director was hired after July 1, 2015 and does not have the minimum school food service experience for this SFA.

Corrective Action Needed: Complete the Professional Standards Exemption form and submit to Karrie Isaacson, karrie.isaacson@dpi.wi.gov for review.

Food Safety, Storage and Buy American

Commendations

The Food Safety manual was completed and site specific. It had all of the required components including the list of Process 1, 2, and 3 foods, list of kitchen equipment, and the necessary SOPs. The temperature logs for the dish machine, coolers and freezers were also well documented and well organized.

Technical Assistance/Compliance Reminders

Many products in the dry storage and refrigerator were not labeled with a country of origin, substituting this information for “packaged by” or “distributed by”. This made identifying compliance and noncompliance with the Buy American Provision challenging. The Food Service Director maintains a Buy American Noncompliant Product List, which she is actively updating. As part of Johnson Creek School District’s Procurement Review, SNT will check that the procurement manual includes language pertaining to Buy American. An additional attestation from food service’s distributors and/or vendors may be required. Further information is available on the USDA Foods [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Two products, watermelons from Mexico and cucumbers from Canada, were identified during the onsite review as non-domestic products without noncompliant product documentation.

Findings and Corrective Action:

- **Finding #1:** Standard operating procedures (SOPs) for Field Trips was not included in the Food Safety manual.

Corrective Action Needed: Print a copy of the [Field Trip SOP](#), discuss with staff, and add it to the Food Safety manual. Submit a statement in writing this has been completed.

- **Finding #2:** 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. This was completed on-site. **No further action required.**

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
All 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

Commendations/Comments/Technical Assistance/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 SFA is looking at ways to increase breakfast participation. One idea would be to look at offering a mid-morning breakfast (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. Even though a summer feeding program is not operated at Johnson Creek, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

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

inclusive map of all potential participating sites in your area, see the [interactive map](#) 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

Special Milk Program

Commendations/Comments/Technical Assistance/Compliance Reminders

- The October claim resulted in an underclaim. You may submit an amended copy of the claim. To be sure that the claim is correct each month, use the check off sheets only to determine the claim for reimbursement.
- Currently, the SFA is only claiming the milk served in the paid category and never in the free category. To increase reimbursement, transfer eligibility status from already submitted and determined applications along with Direct Certification runs to the students who qualify for free milk. Then send out applications to all other households letting them know of the free milk option and that they can apply using the Free and Reduced Meal Application. Start date of eligibility is based on when the students were matched on DC or their application was determined free.

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

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

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



With School Nutrition Programs!