

# USDA Child Nutrition Programs Administrative Review Summary Report

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School Food Authority: Lake Mills School District

Agency Code: 28-2898

School(s) Reviewed: Lake Mills High School

Review Date(s): January 2-4, 2018

Date of Exit Conference: 1/4/18

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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.

## **Appreciation/Commendations:**

Thank you to the Food Service Director, Determining Official, Superintendent, Business Manager, Food Service Staff, District Staff, and Secretaries 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. Thank you for all that you do to serve the students healthy meals!

## **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. All eligibility determinations were made correctly. Well done!

##### **Technical Assistance/Compliance Reminders**

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

#### **Verification**

##### **Commendations**

Verification was well done and completed in a timely manner. The Verifying Official is very organized. Three applications were 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 the February 1 deadline and was completed correctly. Great work!

## Meal Counting and Claiming

### Commendations

Edit checks have been completed for each site. An edit check was completed for Breakfast and Lunch at each site as well. The Accuclaim was used to submit the claims and all claims were submitted correctly and in a timely manner. Nice job!

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to the staff at Lake Mills High School for the warm welcome. We appreciated your cooperation during the Administrative Review and for providing the requested documentation in a timely and organized manner. Lake Mills High School is doing an excellent job at offering a wide variety of appealing food options. It was great to see the garden bar with fresh fruits and vegetables available to students.

### Comments/Technical Assistance/Compliance Reminders

#### Reimbursable Meal Service Lines

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, including vegetable subgroups, independently. This ensures that each student is able to take a reimbursable meal every day *in any line they may choose*.

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. In other words, **all of the Grab & Go and made to order options (e.g., pizza, wraps and sub sandwiches, salads, parfaits etc) are each considered their own reimbursable meal “line” and must meet daily and weekly meal pattern requirements, including vegetable subgroups, independently.**

For example, let us look at the grain component, to determine if minimum daily and weekly grain amounts are offered, the menu planner will need to look at each reimbursable meal line and tally up the amount of grains offered with each meal. For instance, every day, Lake Mills High School offers a fruit parfait with granola (credits as 1 oz eq grain) and a chicken sandwich (credits as 3 oz eq grain), and students are only able to select one entree option. The menu planner can refer to the meal pattern tables to determine if daily and weekly grain amounts were met.

Daily meal pattern requirements for grain is 2 oz eq, so we know that the parfait will be short but the chicken sandwich meets requirements. To remedy the parfait shortage, more granola or another grain option will need to be offered to students. To determine if the weekly requirements were met, you can add up the oz eq of grains offered during the week. For the parfait, if 1 oz eq grain was offered everyday then 5 oz eq grain would be offered over the course of the week (1 oz eq offered daily x 5 days a week = 5 oz eq grains total for the week). This is also short of the weekly meal pattern requirement of 10 oz eq for grains.

Perhaps the easiest way to include/offer all vegetable subgroup requirements would be to offer them in your garden bar. Consider adding more variety of vegetables from different subgroups to help meet weekly subgroup requirements. Remember, 1 cup of vegetable is the minimum that High School students must be offered every day.

To assist in ensuring that meal pattern is being met (particularly vegetable subgroup requirements) for every entree option, menu planning worksheets can be a helpful tool. It is strongly encouraged to use a 9-12 (Lunch) worksheet to help you plan your lunch menus. These worksheets and instructions on how to fill them out can be found on the Menu Planning webpage, under the Menu Planning Tools heading ([dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning)).

### **Standardized Recipes**

Standardized recipes are another important way to document that meal pattern is being met. It is also helpful to be consistent with the naming of food items on recipes and the names found on production records. This ensures that there is no confusion among staff for what product is to be used in school meals. Technical assistance was given on the importance of consistent naming especially for the type of beef used, buns and tortilla sizes. In addition, it is helpful to say the equipment used to assemble the recipe.

It was noted that some recipes are from a food service management company. It is ok that you use these recipes, but they must be updated to reflect current practices and products used in your kitchen. Guidance on what a standardized recipe should include can be found on our Recipe Resources and Tools webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Furthermore, To-Go breakfast bags must have a standardized recipe or all the ingredients included in each reimbursable meal must be listed on the production records. Once more, standardized recipes are a way to show that meal pattern is being met.

### **Signage**

The National School Lunch Program regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at breakfast and lunch. While there was sufficient signage for lunch, a breakfast menu was absent on the day of observation (January 3rd). It is encouraged to have the menu posted for students to see what the menu options are.

Additionally, signage is important to communicate serving sizes to students. Reviewers enjoyed seeing the colorful pictures of 1/2 cup serving sizes of broccoli and oranges posted directly on the garden bar; however, it would be helpful to include additional pictures of 1/2 cup applesauce and 1/2 cup romaine lettuce, or whatever the vegetable of the day is.

### **Offer vs. Serve (OVS)**

Under OVS, students must *select* at least 1/2 cup of fruit, vegetable or a combination as one of their three components. However, in order to meet minimum meal pattern requirements, they must be *offered* at least 1 cup of vegetable and 1/2 cup of fruit (for grades 9-12).

To assist with recognition of OVS at the point of service, the applesauce spoodle (1/4 cup) should be changed to a 1/2 cup spoodle. Students will be more likely to take the entire 1/2 cup serving of fruit, but it may also be easier for point of service staff to identify a 1/2 cup serving to determine if the

minimum 1/2 cup fruit or vegetable requirement is being met. In addition, remind staff that four orange wedges are needed to equal a 1/2 cup serving of fruit.

To assist in understanding OVS requirements, review the Offer versus Serve resources on our website. Watch the Offer versus Serve webcast (<https://dpi.wi.gov/school-nutrition/training/webcasts#O>) and/or review the Offer Versus Serve Guidance manual (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>)

### **Production Records**

Likewise as on Standardized Recipes, production records should be clear as to what product is being used (identity, brand, description and/or fruit count sizes). For example, for the week of review, Monday November, 6th, the production records listed blueberry waffles, however, there was crediting documentation provided for blueberry waffles manufactured by both Pillsbury and Smuckers but with differing crediting.

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Refer to DPI's production record "Must Haves and Nice to Haves" document on our Production Records webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). Remember that thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

### **Training**

DPI conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. Courses such as Meal Pattern: The Whole Enchilada and Offer versus Serve are recommended for lead workers and menu planners from each site. Information, including dates and locations, will be posted on the DPI training webpage (<http://dpi.wi.gov/school-nutrition/training>) as they are scheduled.

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

*Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action. Thank you.*

### **Meal Pattern**

**❑ Finding 1: The To-Go breakfast bags did not have standardized recipes to accompany them, nor were all the food items offered to students listed on the production records.** Crediting was able to be determined on site, and there were not shortages, however, moving forward there needs to be documentation for what is included in the reimbursable meal to assess whether or not the meal pattern was met.

**Corrective Action Required:** Submit completed production records (for 1 week) for breakfast for the week of review that lists all food items offered to students with the reimbursable meal or standardized recipes for all the To-Go breakfast bags.

**❑ Finding 2: Daily and weekly grain shortage at lunch for week of review and day of observation for the following menu options:**

- To Go Salads – only offered 0.5 oz eq of whole grain croutons, this is short the daily minimum requirement of 2 oz eq Grains.
- Parfaits – only offered 1 oz eq grain (granola), this is short the daily minimum requirement of 2 oz eq grains.
- Tator Tot Casserole – only offered 1.75 oz eq grain (dinner roll), this is short the daily minimum requirement of 2 oz eq grains.

**Corrective Action Required:** Thank for correcting this shortage for the next day’s lunch service by offering a dinner roll with to-go salads and parfaits. Additionally, complete one week of production records and submit menu planning worksheets for the week of review (November 6-10). Include any applicable crediting documentation.

**☐ Finding 3: Weekly grain shortage at breakfast for the week of review for the following menu items:**

- Muffin - only offers 1 oz eq grain to students and students do not have access to additional grain items.

**Corrective Action Required:** Provide a written statement as to what you will do to correct the grain shortage in the aforementioned entree option. In addition, submit completed production records for the week of review.

**☐ Finding 4: Daily and weekly meat/meat alternate shortage at lunch for the week of review and the day of observation in the following menu items:**

- Chicken Caesar wrap - The wrap contains 1.5 oz of meat, which equal 1.5 oz eq m/ma. The parmesan cheese was incorrectly credited and only credits as 0.25 oz eq m/ma, not 0.5 oz eq m/ma.

**Corrective Action Required:** Provide a written statement as to what you will do to correct the meat/meat alternate shortage in the aforementioned entree options. In addition, submit an updated standardized recipe for the wrap with adjusted meat/meat alternate amounts used and corrected crediting.

**☐ Finding 5: Insufficient daily quantity of vegetables offered on Tuesday - Friday for the week of review (November 7-10).** Daily quantity of vegetables offered is determined by reviewing the serving size as listed on production records and by calculating vegetables offered per serving for standardized recipes. It is important to keep in mind that production records and standardized recipes are how menu planners document that meal pattern is being met. They must show that the daily minimums for each component of the meal pattern is being offered to students.

**Insufficient daily quantity of vegetables were found in the following entree options:**

Tuesday 11/7 - Chicken Parm, pizza, panini, chicken sandwich, cheese burger, blueberry parfait, chicken Caesar salad, ham sub, turkey sub, turkey wrap, Caesar wrap.

Wednesday 11/8 - pizza, panini, chicken sandwich, cheese burger, blueberry parfait, ham sub, turkey sub, turkey wrap, Caesar wrap.

Thursday 11/9 - Sweet and Sour Chicken, pizza, panini, chicken sandwich, cheese burger, blueberry parfait, ham sub, turkey sub, turkey wrap, Caesar wrap.

Friday 11/10 - Sloppy joe, pizza, panini, chicken sandwich, cheese burger, blueberry parfait, ham sub, turkey sub, turkey wrap, Caesar wrap.

***As a daily vegetable shortage was found during the previous administrative review, this is a repeat violation and will result in fiscal action. Meals will be reclaimed for the days (Tuesday - Friday) that insufficient quantity was offered for the week of review.***

**Corrective Action Required:** Submit a written statement describing your plan for correcting this daily and weekly shortage in the aforementioned entree options. You may choose to offer additional vegetables on the garden bar or increase the planned serving size of each vegetable offered. In addition, complete one week of production records and submit menu planning worksheets for the week of review (November 6-10).

**❑ Finding 6: Vegetable subgroup shortages for the week of review (dark green, beans/peas/legumes and other vegetables).** Note: each entree option must meet the vegetable subgroup requirements. It may help to offer additional vegetables on the salad bar to help meet the weekly subgroup requirements.

**Corrective Action Required:** Submit a written statement describing your plan for correcting the weekly vegetable subgroup shortages. In addition, complete one week of production records and submit menu planning worksheets for the week of review (November 6-10).

#### **Standardized Recipes**

**❑ Finding 7:** A standardized recipe was missing for the three cheese grilled cheese panini. Any variation in the planned entrée (one cheese grilled cheese panini vs three cheese grilled cheese panini) must have accompanying documentation to ensure that meal pattern is met.

**Corrective Action Required:** Submit a standardized recipe for the three cheese grilled cheese.

#### **Offer Versus Serve**

**❑ Finding 8:** During lunch service for the day of onsite observation, 24 non-reimbursable meals were noted due to the service of meals with less than 1/2 cup fruit or vegetables. ***All meals with less than 1/2 cup fruit or vegetable must be reclaimed.***

**Corrective Action Required:** Have all staff complete Offer vs Serve training. Submit a dated training sign-in sheet.

### **3. RESOURCE MANAGEMENT**

#### **Commendations**

The SFA has an Unpaid Meal Charge Policy in place that has been communicated with households.

#### **Technical Assistance/Compliance Reminders**

- Consider updating the policy to include at what point the households will be notified of a negative account balance, include when and how often you will notify families of this, and whether an alternate meal will be given when the student has exceeded the negative account balance threshold set by the district.

- You may decide to have a stricter policy for high school students than the middle school or elementary school. If this is done, be sure to outline the different policies for each grade grouping and send the policy out to households so it is clearly communicated.
- If alternate meals are being claimed, they must meet meal pattern. The difference between the cost of the alternate meal (labor, food cost, etc.) and the reimbursement cannot be absorbed by Fund 50. A transfer must be made to Fund 50 for the difference.
- If alternate meals are not being claimed and the student isn't charged, you may serve the student(s) any food/beverage you decide at no charge. It does not have to meet Smart Snacks. However, you must keep track of the cost of those items served as well as labor and any other costs incurred to make a fund transfer into Fund 50. Non-federal funds must cover the cost of these alternate meals.

### **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 on our Financial Management 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.
- Refer to the [Financial Q&A](#): Per question 15, student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50. Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50. (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, under the Memos heading)

### **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"](#). For a more comprehensive overview, see [SP 23-2017: Unpaid Meal Charges Guidance](#). (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>)
- If you decide to serve 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**

#### **Commendations**

The Food Service Director has begun tracking a la carte food items sold and entered them into the DPI Nonprogram Food Price Calculator Tool. Great job getting started on this!

## Technical Assistance/Compliance Reminders

- Nonprogram foods sold at Lake Mills include: Adult Meals, A la Carte, Extra Entrees, and Extra Milk (for cold lunch or milk break).
- Some a la carte item prices will need to be increased to cover the cost. Vending machines that have revenue accruing to other funds should be set at a similar cost to a la carte items to prevent discouraging students from purchasing a la carte items at meal service which could hurt Fund 50 if vending prices are lower than a la carte items.
- 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 yearly, 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.

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

- Using the Child Nutrition Program Report from the 16-17 SY, the SFA the above calculation was used to determine whether the SFA is in compliance or not, which they are.
- It is advised to use the DPI Nonprogram Food Revenue Tool to make sure you are covering your costs for those nonprogram foods and increase the prices of the a la carte items.

## Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)
- [Nonprogram Foods In a "Nutshell"](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)

## 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.

### Local Wellness Policy

#### Commendations

The SFA does have a Wellness Policy in place. It was updated recently and it is available on the school website. The SFA has a LWP which contains the required elements—nice job! One thing to consider adding to the LWP is to outline the goals for Nutrition Education, Nutrition Promotion, Physical Activity, and Other School Based Strategies for Wellness so when you are assessing your LWP, you can determine whether the goals were met or not.



### **Technical Assistance: Local Wellness Policy**

The final USDA rule requires triennial assessments of the LWP: how the LWP compares to model policies, district compliance with its own policy and progress made in attaining district goals. The first of these assessments is to be completed by June 30, 2020. The following is technical assistance regarding that.

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

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

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

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

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.

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](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](https://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](https://dpi.wi.gov/school-nutrition/wellness-policy)).

### **Smart Snacks in Schools**

## Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

We recommend 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/or print the results for your records along with the product nutrition facts labels.

There are also tracking tools that your school may find helpful on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the Resources heading.

## Fundraisers

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

## Findings and Corrective Action Needed:

### Cafeteria

#### **☐ Finding 1: The following products were found to be non-compliant with Smart Snacks standards**

- Veryfine Cranberry Juice Cocktail - the beverage is too high in calories.
- Blue Ribbon Classics Cool Tubes Rainbow Treat - does not meet Smart Snacks general standards
- Helados Mexico Lime popsicle - does not meet Smart Snacks general standards
- Fritos corn chips are not whole grain rich.
- Scooby Doo Fruit Flavored Snacks - Sugar exceeds 35% sugar by weight.

**Corrective Action Required:** Please provide a written statement that details your time frame to bring all products into compliance. Include whether or not you will discontinue the item(s) or find a

replacement product(s). If a replacement product is found, provide the Smart Snacks calculator print-out and a copy of the nutrition facts label for each product.

### **School store**

#### **☐ Finding 2: The following products were found to be non-compliant with Smart Snacks standards**

- Caveman Nutrition Bar (Dark Chocolate Cashew Almond) - Calories exceed 200, Calories from total fat exceed 35%, Calories from saturated fat are not less than 10%.
- Hot chocolate mix - does not meet the Smart Snacks general standards
- Rice Krispies Treats Chocolatey Drizzle - not whole grain
- Skinny Pop Popcorn - Calories from total fat exceed 35%.
- Kirkland Trail Mix - Calories exceed 200, Calories from total fat exceed 35%, Calories from saturated fat are not less than 10%, Sugar exceeds 35% sugar by weight.
- Welch's Island Fruits Fruit Snacks 0.5oz (14g) - Sugar exceeds 35% sugar by weight.
- Welch's Berries n' Cherries Fruit Snacks (60g)- Sugar exceeds 35% sugar by weight.

**Corrective Action Required:** Please provide a written statement that details your time frame to bring all products into compliance, in addition indicate who is responsible for determining product compliance. Include whether or not you will discontinue the item(s) or find a replacement product(s). If a replacement product is found, provide the Smart Snacks calculator print-out and a copy of the nutrition facts label for each product.

### **FFA vending machine**

#### **☐ Finding 3: The following products were found to be non-compliant with Smart Snacks standards**

- Kemps 16 fl oz Low-fat flavored milk (chocolate and strawberry) - must be Fat-free flavored milk and 12 fl oz or less
- Kemps 16 fl oz 100% Orange Juice - Your beverage exceeds the 12 fl. oz. serving size limit for High School.

**Corrective Action Required:** Please provide a written statement that details your time frame to bring all products into compliance, in addition indicate who is responsible for determining product compliance. Include whether or not you will discontinue the item(s) or find a replacement product(s). If a replacement product is found, provide the Smart Snacks calculator print-out and a copy of the nutrition facts label for each product.

### **Athletic Vending machine**

#### **☐ Finding 4: The following products were found to be non-compliant with Smart Snacks standards**

- 20 fl oz regular Gatorade

**Corrective Action Required:** Please provide a written statement that details your time frame to bring all products into compliance, in addition indicate who is responsible for determining product compliance. Include whether or not you will discontinue the item(s) or find a replacement product(s). If a replacement product is found, provide the Smart Snacks calculator print-out and a copy of the nutrition facts label for each product.

### **Professional Standards**

#### **Commendations**

Professional standards training hours are being tracked using the USDA Microsoft Access program. All nutrition staff have their required training hours completed for the 17-18 SY. Great job!

## **Food Safety**

### **Commendations**

The Food Safety manual was available for review and up to date. The temperature logs for the dish machine, coolers and freezers were also well documented and well organized. The most recent Food Safety Inspection is posted in the hallway for all to view. Nice work!

## **Buy American**

### **Commendations/Technical Assistance**

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

The following products were found to be non-compliant with the Buy American provision:

- Canned pineapple tidbits – Thailand
- Dole mixed fruit cups – Thailand
- Dole tropical fruit cups – Philippines
- Bananas – Honduras
- Cucumbers – Mexico

No further action is required. Reviewers commend the Food Service Director for keeping the necessary documentation to demonstrate the reasons for purchasing these non-compliant products. Thank you!

## **Reporting and Recordkeeping**

### **Commendations**

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- Good work keeping all records regarding the school nutrition programs for 3 years plus the current school year.

## **School Breakfast Program (SBP)**

### **Commendations**

- At the beginning of the school year, the SFA is doing a great job notifying families of the School Breakfast program via newsletter, brochures, and menus posted online and in the paper. Nice job!
- The High School offers a mid-morning breakfast which has increased breakfast participation tremendously- way to go!

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

### **Technical Assistance**

#### **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 (insert SFA) USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months.

SFAs can inform families of summer meals via the following methods:

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

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).

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**

The SFA is doing a great job keeping track of all milk served to the 4K students. The students are only allowed to take unflavored fat free or 1% milk per the new CACFP regulation. Very impressed to know that the students are not allowed to take a chocolate milk.

#### **Findings and Corrective Action**

**Finding #1:** The SFA is claiming Reduced eligible milk served in the Free category. For the Special Milk Program, only milk served to Free eligible students can be claimed in the Free category. Reduced eligible student milk and Paid student milk should be claimed under the Paid category.

**Corrective Action Required:** Submit a copy of the report with milk counts used for the December SMP claim once you have submitted the December SMP claim.

## Wisconsin School Day Milk Program

### Commendations

The 16-17 SY WSDMP claim was correctly consolidated and claimed. The Business Manager is very organized, keeping all reports in a binder and counts in a spreadsheet to make sure the claim is correct. Keep up the great work!

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

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

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



*With School Nutrition Programs!*