

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

School Food Authority: Waterloo School District

Agency Code: 28-6118

School(s) Reviewed: Waterloo High School

Review Date(s): 3/12/18-3/13/18

Date of Exit Conference: 3/13/18

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:

GOALS

- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

SNSDC TRAININGS

- The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer in Green Bay, Wausau, Rice Lake, Madison and Milwaukee. There will be emails sent in the coming months regarding the trainings available at these locations. You may also check back on the [School Nutrition Team training website](https://dpi.wi.gov/school-nutrition/training) (https://dpi.wi.gov/school-nutrition/training).

Appreciation/Commendations:

Thank you to the Business Manager, Food Service Director, and Food Service 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. Thank you for taking the time to create the binders of documentation complete with the off-site questions and requests! Thank you for delivering it to DPI as well. This was much appreciated and helped expedite the review process!

Thank you for all that you do to feed the students healthy meals!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Applications were determined in a timely manner. Each application was signed off on and dated by the Determining Official. The official's organization of the requested benefits information made it easy to review.
- Direct Certification is run early and often which is a best practice. Great work!

Technical Assistance/Compliance Reminders

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

Start Date of Eligibility

- The start date of eligibility for meal benefits is the date the application is approved by the Determining Official or the date Direct Certification is run. You may never backdate, unless in the case of running Direct Certification one day and not uploading it into the software system until the next day. In that case, you would put the start date of eligibility as the date you ran Direct Certification, as you have the documentation to support those eligibility statuses.

Disclosure

- For any staff that has access to students' eligibility status that isn't within the School Nutrition Office (i.e. IT Department, Principals, Secretaries) they should sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This is to protect the students from any overt identification. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Transferring Students

- If a student had a free or reduced price meal eligibility at his/her prior school district, the prior school district can provide a copy to the district the student is transferring in to without question.
- The start date of eligibility is the date the Determining Official reviews and determines the application, signing and dating it.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to a minimum of 3 places:
 - Local news media
 - Grassroots organizations (food pantry, library, grocery store, WIC clinic, laundromat)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but may ask to have it published as a public service. The SFA must maintain documentation of whom it was sent to along with the specific materials distributed.

Findings and Corrective Action

- ❑ **Finding #1:** One student was receiving reduced meal benefits with no documentation on file.

Corrective Action: Notify the household, whose benefits will be decreased from reduced 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. **Household filled out a new application to qualify for Reduced benefits, no further action required.**

Verification

Commendations/Technical Assistance

- Verification was completed in a timely manner, prior to the November 15 deadline and completed correctly.
- Two applications were verified. The Confirming Official and Verifying Official signed off on both applications.
- All DPI template letters were used. One of the applications chosen for Verification resulted in a decrease in benefits, adverse action was carried out correctly, giving the household 10 days until benefits changed.
- Verification Collection Report was completed prior to the February 1 deadline and completed correctly.
- As a reminder, Verification can begin on October 1, with the pool of applications from July 1 to October 1. Beginning the Verification process in the beginning of October will allow more time to complete Verification.

Meal Counting and Claiming

Technical Assistance

- The lunch claim resulted in an underclaim. Be sure to use the Accuclaim report when submitting the monthly claims so that you are capturing all reimbursable meals served.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Waterloo High School operates a nutritious and organized meal program. We extend sincere appreciation to the FSD and nutrition professionals who provided superb off-site documentation, warmly welcomed us to their school, and took the time to answer our many questions. All meal components are appealing and presented in an attractive manner. Signage is creative and excellent. Keep up the good work, Waterloo!

Comments/Technical Assistance/Compliance Reminders

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. Pre-kindergarten is exempt from the CACFP meal pattern *if* they are comingled with older students following the National School Lunch Program; *meaning that pre-k students can follow the NSLP meal pattern if they are served at the same time as older students and without distinction*. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Contact Erin Opgenorth (erin.opgenorth@dpi.wi.gov) or Tanya Kirtz (tanya.kirtz@dpi.wi.gov) with any questions.

Your scratch cooking initiative is admirable. Refer to the [Recipe Crediting Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/recipe-crediting-tool.xls) for crediting assistance for recipes (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/recipe-crediting-tool.xls>).

Information about [Wisconsin USDA Foods](https://dpi.wi.gov/school-nutrition/usda) is available on the DPI webpage (<https://dpi.wi.gov/school-nutrition/usda>). For more information regarding USDA foods, please contact Dino Ante at antonio.ante@dpi.wi.gov.

Please consider submitting photos of your meals, signage, and scratch cooking to us to share on social media. You can submit photos to the School Nutrition Team to be posted on the DPI SNT Facebook page (WI DPI School Nutrition Programs [[@WisDPI.SNP](https://www.facebook.com/WisDPI.SNP)]), Twitter page ([@WisDPI_SNP](https://twitter.com/WisDPI_SNP)) or Instagram page ([wisdpi_snt](https://www.instagram.com/wisdpi_snt)). Send photos to Dana Colla at dana.colla@dpi.wi.gov or SNPsocialmedia@dpi.wi.gov. You can see some of the recent postings on the right-hand side of the DPI School Nutrition home page.

Findings and Corrective Action Needed

❑ Finding #1: Breakfast production records

The breakfast production record template currently in use is missing information, such as planned portion size, number of purchase units, milk specified by type, fruit specified by type, and any extra menu items and substitutions made to original plans. While there is no required production record template, there are some examples that may be used on our [Production Records](https://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>). A copy of the production record requirements (“Must Haves and Nice to Haves” list) can also be found at that link. Alternatively, the production records used at lunch could be used at breakfast.

Corrective Action Needed for Finding #1: Please submit a breakfast production record template that contains all required information.

❑ Finding #2: Offer versus serve at breakfast

Cashiers at breakfast were allowing students to take “reimbursable meals” without ½ cup fruit and/or vegetable. They stated that ½ fruit and/or vegetable is not required to make a reimbursable breakfast. This is false- all reimbursable meals whether at lunch or breakfast must contain ½ cup of fruit and/or vegetable. *This resulted in two (2) non-reimbursable meals at breakfast on 3/13/2018.* One student was allowed to take a sandwich and milk; another pancakes and milk. Without ½ cup fruit and/or vegetables, these meals should have been charged a la carte, not as reimbursable meals. Staff must be trained to recognize and enforce reimbursable meals.

Corrective Action Needed for Finding #2: Conduct or view the [OVS webinar](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html) for all food service staff (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html). Provide documentation of all food service staff (including teachers or students who assist with meal service) attendance at this OVS training.

3. RESOURCE MANAGEMENT

Commendations

PLE Tool

- SFA is running the PLE tool correctly and adhering to the required lunch price increases every year by exceeding the necessary 10 cent weighted average increase.
- USDA has not yet released the PLE tool for the 2018-19 SY. Once it is released, you will get an email through the SNT listserv.

Technical Assistance/Compliance Reminders

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>).
- The SFA currently has a written unpaid meal charge policy in place.
- Some considerations for the Unpaid Meal Charge Policy would be to disallow any student a la carte purchases if their account is negative. They may still take a reimbursable meal regardless of eligibility status and be charged, per your current policy.
- If you decide to serve students an alternate meal after they have reached a certain negative fund balance, and you want to claim them, 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](#) may be found on the Financial Management webpage. 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.
- Per question 15 of the [Financial Q&A](#), 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 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>). 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.

Refunds of Student Meal Accounts

- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Revenue from Nonprogram Foods

Commendations/Comments

- Using the Child Nutrition Program Report from the 16-17 SY and the below USDA Nonprogram Food Revenue Tool, the SFA is in compliance with the Nonprogram Food Revenue regulation.

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at the school district include: Adult Meals, Extra Entrees, Extra Milk, Catering, Vending Machine items, and A la carte items.
- Be sure to keep track of all nonprogram expenditures and revenues to record this on the Annual Financial Report.
- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#), located on the SNT 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>).

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

- The [Menu Raw Food Costing Tool](#) is an excellent tool to cost out your reimbursable meals and extra entrees (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw-food-costing-tool.xls>). It is also helpful in completing the [DPI Nonprogram Food Price Calculator Tool](#) which will also calculate the USDA Non Program Food Revenue calculation for you automatically. To ensure you are pricing the extra entrees correctly, use the Menu Raw Food Costing Tool and the DPI Nonprogram Food Price Calculator Tool.

Findings and Corrective Action

- ❑ **Finding #1:** At breakfast, a cashier was charging students for a la carte purchases instead of reimbursable meals. One student was charged for an uncrustable sandwich (\$1.00) and a juice (\$0.50) which equals less than a reimbursable breakfast (\$1.65). The cashier wanted to save the student money by charging the a la carte price instead of the breakfast price. By doing so, the SFA is losing out on reimbursement money. Also, the a la carte prices for those two items are not priced at the proper nonprogram price to cover all expenses.

Corrective Action: Use the DPI Non Program Food Price Calculator tool to enter the cost of all a la carte food and beverage items (vending machine items included). Increase the a la carte food and beverage items to cover all costs accordingly. **Submit a copy of the completed DPI Nonprogram Food Price Calculator tool as well as a list of all a la carte items and their new prices. Implement the new prices by the corrective action due date.**

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed for all staff involved with the School Nutrition Programs at the beginning of the school year. The PI 1441 form was completed correctly and kept on file.

Local Wellness Policy

Commendations

The SFA has a recently updated Wellness Policy in place. Thank you for having a wellness policy on file and working to assure students are on the path for a healthy lifestyle. It is evident that wellness is very

important within the Waterloo School District. Steps are being taken towards goals set forth within the wellness policy which is exciting to see. Keep up the great work!

Technical Assistance

SFA is required to complete an assessment of the LWP:

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](https://dpi.wi.gov/school-nutrition/wellness-policy) webpage (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy](http://www.fns.usda.gov/tn/implementation-tools-and-resources) webpage (<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](https://www.wihealthatlas.org/lwp/) webpage (<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.

Overt Identification

Findings and Corrective Action

- Finding #1:** The price for a breakfast and a lunch shows on the computer screen indicating whether the student is free, reduced, or paid eligible. The number 1, 2, or 3 is also listed on the screen to indicate free, reduced, or paid status.

Corrective Action Needed: Reconfigure the point of sale software to not show the price of a lunch or breakfast. Remove the numbers on the screen as well, so no overt identification is occurring. **Submit a statement via email that this has been done.**

Special Dietary Needs

Technical Assistance

Students seeking accommodations for a diet-related disability must provide a medical statement signed by a licensed medical practitioner (such as a physician, nurse practitioner, or physician assistant). The signed medical statement must include a description of the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, and an explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted). More information regarding accommodating special dietary needs, including a physician's form template, can be found on the [Special Dietary Needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Smart Snacks

Commendations

Thank you to the FSD for providing healthy options in the vending machines and ala carte line. Options are appropriately limited when middle school students access the cafeteria. We are very impressed with the way that you have each row in the vending machines programmed to be available throughout the school day.

Comments/Technical Assistance/Compliance Reminders

Pepsi vending machines are located between the cafeteria and gymnasium. The soda machine contains non-compliant products for any grade group, thus, it must be turned off during the school day (midnight- thirty minutes after the instructional period ends). However, the beverage and snack machine contains products compliant for high school students, but no other grade group. This machine can be turned on when accessible only by high school students (e.g., during high school lunch period).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding #1: Non-compliant school day food sale

The high school principal tracks fundraisers at WHS. The Art Club at WHS sold suckers, a non-compliant food, in the cafeteria during lunch period on 2/14/2018. Non-compliant products or exempt fundraisers may *not* be sold in competition with reimbursable meals in the food service during meal service.

Corrective Action Needed for Finding #1: Please submit a written plan of action ensuring that all future fundraisers will be compliant. 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>).

Professional Standards

Comments/Commendations

The Business Manager, Food Service Director, and Determining Official share the majority of the program duties. The Food Service Director is doing a good job of making sure the food service staff are getting the required training hours each school year.

Technical Assistance

Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](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 for all staff. Clearly document all training information, the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff).

Corrective Action Needed: Include all current training hours for each employee involved in the school nutrition programs (Business Manager, Food Service Director, Determining Official, Food Service Employees) onto the [DPI tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls) or create your own on a Google Sheet (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>). **Submit a copy of the tracking tool with trainings entered.**

Buy American

Comments/Technical Assistance/Compliance Reminders

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 Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

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

More information on this new requirement, including a tool to assist with tracking noncompliance 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>).

Findings and Corrective Action Needed: Buy American

- ❑ **Finding #1: Insufficient information recorded on tracking tool**

There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
2. Name of product

3. Country of origin
4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product
 - e. Distribution- record the reason the distributor carries the non-domestic product
 - f. Other- explain

You may record additional information if you find it beneficial. A suggested template is found on the [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage under Buy American Noncomplaint Product list (word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Corrective Action Needed for Finding #1: Please provide a copy of the Noncompliant Product List with all required information . Include any noncompliant products currently in the SFAs food storage areas. Provide the updated and completed list as corrective action. A template form is located on the [procurement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Food Safety and Storage

Technical Assistance

- Temperature Control for Safety (TCS) foods need to be mechanically refrigerated or kept on ice to keep at 41 degrees Fahrenheit or lower during meal service.

Findings and Corrective Action

- Finding #1:** The most recent Food Safety Inspection was not posted at Waterloo High School.

Corrective Action Needed: Post the most recent Food Safety Inspection in the cafeteria or in the hallway outside of the cafeteria for the public to view. **Completed on-site, no further action required.**

- Finding #2:** Standard operating procedure (SOP) regarding the [Milk Barrels](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-barrel-temperature.docx) is not included in the food safety plan at Waterloo High School (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-barrel-temperature.docx>). SOPs are required for all applicable programs and processes occurring at the site.

Corrective Action Needed: Create or adapt a SOP (from the [SNT website](https://dpi.wi.gov/school-nutrition/food-safety)) to reflect *site-specific* procedures—particularly referring to the Milk Barrels (<https://dpi.wi.gov/school-nutrition/food-safety>). **Submit a copy of the Milk Barrel SOP. Corrected 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 documents pertaining to the School Nutrition Programs 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. In other words, keep all documents for 3 years plus the current school year.

School Breakfast Program (SBP)

Technical Assistance

- At the beginning of the school year, the SFA notifies families of the availability of breakfast through the public release, the newsletter, and posting the breakfast menu.

Summer Food Service Program (SFSP) Outreach

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 operated at Lake Holcombe School District during summer school as an open site.

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>).

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program

Commendations

- The claim for the 2016-17 school year was correctly consolidated and claimed for.

Findings and Corrective Action

- Finding #1:** The WSDMP contract on file is outdated.

Corrective Action: Complete a new [WSDMP contract](https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc) and send to the consultant for review (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc>).

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!