

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Lakeside Lutheran

Agency Code: 287170

School(s) Reviewed: Lakeside Lutheran

Review Date(s): December 6-7, 2017

Date of Exit Conference: Dec. 7, 2017

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, 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/Noteworthy Initiatives:

Thank you to the staff at Lakeside Lutheran for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were 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/Comments/Technical Assistance/Compliance Reminders

Direct Certification

As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run. The effective eligibility date for a DC eligible student is the date of the original output file. Students who qualify are notified of their eligibility. **Technical assistance** was provided.

Free and Reduced Price Meal Applications

Several electronic applications with income information did not have a social security number (SSN) entered on the application. Each of these applications missing an SSN had a corresponding paper application with the SSN or indication of no SSN, meaning that these applications were still considered complete and were not recorded on the SFA-1 form as application errors. When transferring information from a paper application to the electronic application system, care must be taken to enter every piece of information provided to ensure the electronic version is complete and matches the paper application. **Technical assistance** was provided.

Overt Identification

The meal counting system must prevent overt identification of students receiving free and reduced price benefits. **Technical assistance** was provided.

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ Finding: The finding was that electronic applications are being utilized by the school. While this is a great feature for the school, prior approval of software is required from DPI to use this type of application. When using electronic applications the application must contain the information required of all applications.

Corrective Action Needed: Lakeside will have to contact the software vendor and have them reach out to the DPI School Nutrition team to get approval for the electronic application they are currently using. Tanya Kirtz is the contact for this in the DPI office. She can be reached at 608-266-2410 or tanya.kirtz@dpi.wi.gov. Lakeside will then provide a statement as corrective action indicating if they receive approval or not for the use of the electronic application they are using. If no approval is given then the electronic application must be taken off website and not utilized until the school can find an approved electronic application. In addition, the electronic application did not have the correct non-discrimination statement; the font and format were not correct. Please have this corrected and submit a screen shot of the updated non-discrimination that is used within the electronic application.

❑ **Finding:** The finding was that the direct certification letter sent to households did not contain the correct non-discrimination statement. In addition, technical assistance was provided to SFA to consider changing some of the language in the letter as to protect families in a joint custody situation for identifying how a household has qualified.

Corrective Action Needed: Please submit a copy of the direct certification letter the SFA will use to notify families of meal benefits.

❑ **Finding:** The finding was that meal prices for student meals are visible on the computer screen that can be seen by students, which constitutes overt identification.

Corrective Action Needed: Please correct this issue of overt identification and submit a statement of how this was completed.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

Verification is only required when eligibility is determined through the application process, and is not required for eligibility determinations made through the direct certification process. Each year schools must annually verify eligibility of children from a sample of household applications approved free and reduced price benefits for that school year.

When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application. The school can utilize the tracking tool also for this process. This can be found on the [Verification](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>). **Technical assistance** was provided.

Findings and Corrective Action Needed: Verification

❑ **Finding:** While verification was completed, there was misunderstanding of the process and the confirmation review. The letter sent out to the family selected for verification did not contain the correct non-discrimination statement. It also was not in the required font and format size. There was no clear documentation to show that a confirmation review had been conducted.

Corrective Action Needed: Review the verification process. Submit a detailed statement, which outlines the school's process of verification including the role of the confirming official. Please submit a copy of the corrected updated letter the school will be using to notify households they have been picked for verification. A School Nutrition Team [Verification webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#verif) is available to assist schools (<https://dpi.wi.gov/school-nutrition/training/webcasts#verif>).

❑ **Finding:** The finding was that two students on the application that was selected for verification did not have their benefit changed from "reduced" to "paid" within the appropriate time frame outlined in the adverse action letter sent to the household. These two students were incorrectly receiving reduced priced meals for several operating days. This finding has been noted on the SFA-1 form and is recorded as two benefit issuance errors.

Corrective Action Needed: The benefit issuance list must be updated to reflect the correct paid status of these two students. This error was corrected onsite on 12/6/17 and no further action is needed.

❑ Finding: The finding was that the verification collection report had an error in part C of 5-8. The application selected for verification was incorrectly categorized as “NOT responded, changed to paid.” Based on verification information provided, the application selected for verification should be categorized as “responded, changed to paid.”

Corrective Action Needed: Please modify the verification collection report to reflect the correct results of verification by original benefit type (section 5-8). Notify the Nutrition Program Consultant when the modifications are completed.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

The edit checks and meal counting/claiming procedures appear to be accurate and effective.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations/Comments/Technical Assistance/Compliance Reminders

Thank you to all staff at Lakeside Lutheran High School. All staff was pleasant to work with, receptive to feedback, and all students were polite and well behaved. Thank you to the Food Service Director for providing all documentation ahead of time in an orderly fashion and answering additional questions promptly. This greatly expedited the Administrative Review process. The Food Service Director shows great commitment to providing nutritious meals and a healthy environment for students.

Training

It is recommended that anyone involved with the School Meals Program attend DPI training classes. The classes are offered in the summer months and select other times throughout the year. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Information on upcoming trainings can be found on DPI’s [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI’s [Webcast Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts).

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. Currently, there is missing information, such as details of each menu item, the planned number of portions, the total number of purchase units prepared, the total number of portions prepared, milk usage, and substitutions made for students with special dietary needs. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

Be specific on production records about the identity, brand, and description of the items served. Production records should indicate exactly what was offered as part of a reimbursable meal. Including this detailed information ensures all staff will be able to identify the exact products to use, the menus are being served as planned, and the components are crediting as planned.

While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). A copy of the production record requirements (“Must

haves and Nice to haves” list) can also be found at that link as well as a salad bar production record, if interested.

Non-reimbursable Meals

Four meals observed on the day of onsite review were deemed non-reimbursable. All four meals included the ½ cup fruit or vegetable required under Offer Versus Serve, which is considered a full component, as well as an additional full component. All four meals included portions of a third component (e.g., one dinner roll instead of two, less than the full 1 cup fruit or vegetable component), but did not include a *full* third component. Encouraging students to return to the serving line to select a reimbursable meal is allowable. If students do select non-reimbursable meals, all items must be Smart Snacks compliant and students must be charged a la carte prices for each item. Additional training on Offer Versus Serve is available on our [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs) webpage, under the Offer Versus Serve heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>).

Portion Control, Volume Versus Weight

Meat/meat alternate (M/MA) is credited by weight, not by fluid ounces. Spoodles and scoops measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving of ground/diced/shredded meat. Fluid ounces are a volume measure, while ounces are a weight measure. To ensure that students are receiving the adequate amount of meat/meat alternate, weigh the meat/meat alternate, then determine which scoop will hold that weight of meat. As a best practice, include the weight in ounces of each portion on recipes and production records along with the spoodle or scoop used for serving.

Standardized Recipes

All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Crediting should be updated to reflect the quantities and specific products being served. Additionally, the procedures listed on standardized recipes should include specific amounts. For example, replace phrases such as “portion onto bottom half of hamburger bun” with “place 2 oz. of beef onto bottom half of hamburger bun” for clearer instructions. More information can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Milk recipe

When a milk recipe is on file, total milk usage must still be recorded on production records. Milk recipes must be updated twice per year or when you notice that students’ preferences have changed. You can find instructions and a milk recipe template on our [Meal Pattern Components](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk) webpage, under the milk heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk>).

Condiment Usage

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. The first sodium targets remain in effect. While total condiment usage is monitored and documented, portion sizes are not being communicated to students.

Promote correct serving sizes by adding signage at the condiment station with a photo of what one tablespoon of dressing looks like, purchasing single-use one ounce cups to aid in portion control, or using signage such as “One squeeze, please!” on self-serve squirt bottles. More information on sodium

targets is found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) under the Sodium heading. The optional “Weekly Nutrient Calculator” tool to help monitor compliance with sodium targets is also found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) under the Menu Planning Tools heading.

Extra Foods Offered after Point of Service

During the week of review, peanut butter was on the menu and offered on the condiment table. Offering peanut butter or other extra foods for students to self-serve after the point of service (POS) is strongly discouraged. These foods must be taken into account when determining the dietary specifications for the meal (calories, saturated fat, trans fat, and sodium), but they do not contribute towards the meal pattern requirements. Peanut butter can be a significant source of calories, saturated fat, and sodium. The peanut butter offered after the POS is likely contributing excessive amounts of these nutrients, especially because their usage is not limited. Food safety risks and cost control issues should also be considered.

Findings and Corrective Action Needed:

Finding: Production records are missing required information. Please either update your production record template to include all the required information on the [Production Record “Must Haves” for Lunch and Breakfast](#) handout or consider using the DPI template available on our [Production Records](#) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

Corrective Action Needed: Please submit two days of completed production records using an updated template with all required information included.

Finding : Signage is missing the requirement for students to take a ½ cup fruit or vegetable.

Corrective Action Needed: Please add a statement to your current signage that states students must take a ½ cup fruit, vegetable, or combination as part of a reimbursable meal and submit a photo of the updated signage.

Finding : Food service staff and the point of service operator were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch.

Corrective Action Needed: Please submit a signed roster for a staff training on Offer Versus Serve. Please include all food service staff and point of service operators in this training.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/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) (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>

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

Findings and Corrective Action Needed: Nonprofit School Food Service Account

□ **Finding:** The finding was that the unpaid meal balance policy was not printed and distributed to households at the start of the school year. It was indicated that a policy was just approved.

Corrective Action Needed: Please submit a copy of this newly approved policy and the SFA’s plan to distribute this to households.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, 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.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- 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 (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

- Resources:
 - [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (<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) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)
 - **Technical assistance** was provided.

Findings and Corrective Action Needed: Revenue From Nonprogram Foods

□ **Finding:** The finding was that several special event breakfasts are provided by the food service department annually, which is considered “catering” and thus must be counted as non-program foods. Additionally, adult meals and extra milks sold in the cafeteria are considered non-program foods. The

annual financial report (AFR) does not have the revenues and expenditures from these non-program foods separated out in the appropriate sections.

Corrective Action Needed: Please modify the AFR so that the revenues and expenditures from non-program foods are appropriately broken out in the designated sections. Notify the Nutrition Program Consultant when these modifications are completed.

❑ **Finding:** The finding was that several special event breakfasts are provided by the food service department annually, which is considered “catering” and thus must be counted as a non-program foods. Because the SFA is providing food in addition to strictly program foods, extra milk, and adult meals, the non-program revenue tool must be completed. Completion of this tool will assess the appropriateness of the pricing for these events.

Corrective Action Needed: Please complete the non-program foods revenue tool to include these catered breakfasts. Prices for these events should be adjusted accordingly based on the information provided by the completed tool. Questions related to completion of the tool may be directed to Deb Wollin at 608-267-3724 or debra.wollin@dpi.wi.gov. Send the completed tool to the Nutrition Program Consultant via email by the designated corrective action deadline.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).
- However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complain Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

❑ **Finding:** The finding was that there was not a civil rights complaint process in place for the NSLP.

Corrective Action Needed: Please develop a procedure and submit a statement on how the SFA's will address any civil rights complaints regarding the food service program.

Local Wellness Policy

Commendations/Comments/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

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize 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>). At a minimum, LWPs must include specific goals related to:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)

- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

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). 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>). **Technical assistance** was provided as well as resources left on-site. For additional guidance, contact Alicia Dill at alicia.dill@dpi.wi.gov or Kelly Williams at Kelly.williams@dpi.wi.gov.

Findings and Corrective Action Needed: Local Wellness Policy

Finding: The finding was that the SFA's Local Wellness Policy does not contain language for all the minimum required elements stipulated above (1000).

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule. The [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) can assist with sample language (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>).

Finding: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to make the local school wellness policy available to the public and inform the public about the content, implementation of, and updates to the LWP on an annual basis. The finding is that it has not been provided to families.

Corrective Action Needed: Provide a plan for making the wellness policy available to the public and explain how you will notify the public of the policy.

Finding: The finding was that there was not a committee established to review the Wellness policy. The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.

In addition, SFA is required to *inform potential stakeholders* of their ability to participate in the Local Wellness Policy (1004). 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. SFA is required to have a committee of diverse stakeholders and/or a roster of those involved (1003).

Corrective Action Needed: Please provide a statement on how the SFA reached out to the public to create a committee. In addition, submit the titles of persons who will be on the committee. Also, submit a copy of the committee meeting minutes of the newly established Wellness committee. Finally, submit a timeline as to when this wellness policy will be updated to meet the current regulations.

Smart Snacks

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 to students during the school day must meet both the general standards and nutrient standards if they do not qualify for an exemption. More information on the Smart Snack Guidelines can be found in the [Smart Snacks In a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-a-nutshell-smart-snacks.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-a-nutshell-smart-snacks.pdf>).

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. If a fundraiser sells Smart Snack compliant products, there are no limits as to how much or how long these products can be sold. All exempt and nonexempt 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.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

- Food service staff have completed several trainings this year.
- 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, 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 Needed: Professional Standards

❑ **Finding:** While training records are kept for food service staff, there was no documentation that the Determining and Verifying official had training. This official needs to have training that is required by USDA.

Corrective Action Needed: Please provide a tracking tool of food service staff along with the Determining and Verifying official's trainings that been recently taken. Please be sure to include the minimum requirements for a tracking tool.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

SFA does a nice job of tracking non-compliant food products.

Buy American

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports 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. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

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

- If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products, which are processed and produced outside of the U.S., may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- 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 and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures*

Handbook (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>)

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>).

For further guidance, reach out to the DPI contract specialists Alex Zitske at alex.zitske@dpi.wi.gov or Randy Jones at randall.jones@dpi.wi.gov.

Food Safety

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). While you’re at it, visit the [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA’s nutrition assistance program operators.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site’s Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the “And Justice For All” poster can be a convenient way to have both items publicly visible.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

Program records must be maintained for a period of three years after the submission of the final claim for reimbursement of the current fiscal year.

Summer Food Service Program (SFSP) and School Breakfast Program (SBP) Outreach

Summer Food Service Program

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 Lakeside Lutheran High School, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. **Technical assistance** was provided.

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>)

Resources:

- 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

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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

