

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

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**School Food Authority:** Royall School District

**Agency Code:** #29-1673

**School(s) Reviewed:** Royall Intermediate School

**Review Date(s):** November 20-21, 2017

**Date of Exit Conference:** Nov 21, 2017

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- 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](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 (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

## **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at the Royall school district for the courtesies extended to us during the on-site review and for being available to answer questions and provide 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.

The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students and we were impressed with the new food service director whom has gone above and beyond to ensure that the Royall School Nutrition Programs are not only meeting the regulations for the USDA child nutrition programs but are receiving appealing meals that students will enjoy.

Kudos to administrators for recognizing the important role the school nutrition program plays in the ability for children to learn. Operating the school nutrition program is a critical part of serving children during the school day. It is important to remember the role of director includes numerous responsibilities other than cooking meals. Today's directors are responsible for planning menus that meet USDA regulations and are appealing to students, follow food safety and procurement guidelines, effectively managing USDA foods, maintain an appropriate budget based on meal and labor costs, supervise and train staff, collaborate with administrators, faculty, students and community members and provide administrative support. They must also ensure confidentiality of student meal eligibility, manage an appropriate point of service system, maintain and prepare meals for students with special dietary needs and offer regulatory guidance and promote nutrition education in and out of the cafeteria. While the DPI review team is confident that Royall's school nutrition program will continue to flourish under the current leadership it's important to remember that these responsibilities take a good deal of time. Moving forward the district is encouraged to ensure the FSD is allowed the time and tools she needs to be effective. This may include hiring a part time staff member to complete some of the cooking responsibilities or bringing in a substitute occasionally to allow time for the director to manage paperwork.

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Certification and Benefit Issuance**

#### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

The Determining official did a very nice job of completing the eligibility and benefit issuance process. Despite this being her first year as the determining official, she attended DPI classes on the free and reduced process and worked diligently to ensure that applications were approved correctly and in a timely manner. The Royall School District should commend her efforts in this area.

#### **Free and Reduced Price Meal Applications - Reminders**

- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but rather use the [Income Eligibility Guidelines](#) chart based on the frequency. (i.e., weekly, twice monthly, every two weeks, monthly, annually).

- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.
- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with employment that is seasonal and/or self-employed since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular paychecks will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.
- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.
- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](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>).

### **Findings and Corrective Action Needed: Certification and Benefit Issuance**

**Finding #1:** Three applications were approved with errors. One application was approved for reduced benefits rather than free, as would have been if based on face value. One application was approved for free benefits rather than reduced due to an incorrect data entry into the software system. One application was approved with incomplete income information.

**Corrective Action Needed:** The first application error was corrected during the onsite review when follow up with the household found that the original reduced benefit was correct based on annual income for the seasonal worker. No further corrective action is necessary for this error. Fiscal action will not be assessed. Please contact the households of the remaining applications in error and correct them accordingly. If the correction results in an increase in benefits to the household, the change must be made within three operating days of the error. If the correction results in a lesser benefit, the household must be notified and provided 10 operating days before beginning the new benefit. The SFA must send appeal procedures along with the notification letter of the change in benefit.

Please submit a copy of the letter notifying the household of the benefit changes and a copy of the date the benefit is changed in the software system if applicable for each application error. USDA requires fiscal action be calculated for application errors found during the administrative review. Please correct each application error as discussed during the onsite review. Once corrective action is received, fiscal action will be calculated. USDA allows a \$600 forgiveness by program before requiring repayment of funds.

**Finding #2:** Letters sent to households at the beginning of the year with the USDA application for meal benefits included a letter from principals requiring households to sign and return a form if they were not going to complete a free or reduced meals application. Under USDA regulations the meals application may only be used for providing free and or reduced priced benefits to children participating in the school nutrition program. Completing an application for free or reduced priced meals is completely at the discretion of the household and schools are not allowed to require families to complete the application for other district funding purposes. Asking households to sign and return a form if they are not going to complete the application provides the district with indirect information about the economic status of their enrollment and might be considered a civil rights issue.

**Corrective Action Needed:** The letter was updated and the requirement for households to sign and return the form was removed during the onsite visit. No further corrective action is required.

## Verification

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- When applications are selected 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 LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- If a household does not comply with the request for verification and then submits a new application for meal benefits, they must also submit proof of income before the application can be processed or approved. These are not considered new applications.

### Findings and Corrective Action Needed: Verification

- **Finding #1:** The SFA neglected to have the confirming official review and sign off on the applications selected for verification.

**Corrective Action Needed:** Please submit a detailed statement indicating how the district intends to ensure that future verification activities are completed as required by USDA regulations with regard to the verification process.

- **Finding #2:** A formal letter notifying the household that they would be placed back into paid status 10 calendar days after an email correspondence from the household indicating they did not wish to respond to the verification request was not send. Schools are required to send formal notification to households whose benefits will decrease based on verification. The email from the family indicating they did not intend to response completed the verification process and should have been

addressed with a formal letter indicating the date the benefit would end. Under USDA regulations, the email is considered a response from the household.

**Corrective Action Needed:** Please send a dated copy of the letter sent to the household and a copy of the Benefit issuance list from district software showing the date of the benefit change.

## **Meal Counting and Claiming**

### **Technical Assistance (TA)/Compliance Reminders**

- The edit check document in the reviewed school's meal counting software was correctly applied to the October claim. However, review of the electronic edit check for other district schools indicated that there might be an issue with under claiming reimbursable meals district wide. It appeared that one entity in the software, not tied to the meal counting system, included meal counts for eligible students that were not included in the claim. The district was advised to work with their software vender to determine if there might be a coding error assigning some students to an incorrect entity.
- The garden bar at the intermediate school is a wonderful addition to the nutrition program and provides children with a beautiful array of fruits and vegetables. The self-serve bar allows students to freely make daily choices and try new offerings. Likewise, allowing students to self-serve at least some of the items on the main line would provide them with a greater opportunity to select the foods they are most likely to consume and free up a food service staff for other duties such as batch cooking and managing the POS at both breakfast and lunch.
- The end of line point of service counts (POS) are entered into the computer by faculty members as students leave the lunch line. On the day of the onsite visit the review team observed that some faculty entering the student meals did not have a good understanding of offer vs serve requirements. (Note section 3 corrective action). It is a strong recommendation that the district change the current POS system of faculty entering meals for students to a system that is managed by the foodservice department with either scanned bar codes or PIN numbers entered by the student. Since the cafeteria is a learning environment as much as the classroom, having students take responsibility for remembering to bring their scan cards or entering their own PIN numbers serves as a teaching opportunity and promotes responsibility and independence. Even the youngest students are able to enter their own PIN numbers with ease if taught how to do so. Many schools use this as a learning opportunity for children to learn number recognition and work on memorization skills. Having students enter their own number also reduces the margin of error, as it is much less likely for an incorrect meal to be entered into the system. During the onsite visit the review team noticed that a couple of students didn't pass the monitor before leaving the line making it difficult for the adult checking off the meal to determine if the meal was reimbursable.

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

- **Finding:** Breakfast counts were obtained using a paper checklist in the commons area of the intermediate school, which was then entered into the computer system in the classroom by the classroom teacher after breakfast service. It appeared that some of the lists had every student pre-circled for breakfast and then crossed off if they did not select a breakfast. This practice is considered a "back out system" and is not allowed under USDA regulations. The district was cited

for this during the last administrative review resulting in a recalculation of meals and repayment of funds.

Technical assistance was provided as part of the onsite visit during this administrative review on alternate solutions for managing the POS and reducing the potential for error. Suggestions included adopting a computerized POS as students leave the line to reduce the potential for errors and eliminate the current two-step process of paper, then computer entry.

**Corrective Action Needed:** Please submit a detailed statement indicating the steps that will be taken to correct the breakfast POS to ensure that meals are accurately counted at the time the student accepts a breakfast.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations**

Thank you to the food service staff at Royall School District for working hard to serve healthy meals to students each day. The meals are colorful, appealing, and delicious, and students selected a nice variety of fruits and vegetables. The food service director has worked incredibly hard during her first few months on the job, and the effort shows. She has attended trainings to learn and take the steps needed for successful operation of the school nutrition programs.

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

#### **Whole Grain-Rich Chips and Baked Chips**

Sun Chips were offered during the week of review and were listed on the production records under the vegetable component, but they credit towards the grain component. Technical assistance was given on listing this product in the correct category to avoid confusion. When baked potato chips are offered they do not credit towards any component, but rather are considered an extra item. This means that they contribute to the dietary specifications (calories, sodium, and saturated fat) but do not count as an item under Offer versus Serve.

#### **Milk Types**

The printed breakfast menu inconsistently states the milk types served. Please change your printed menu to reflect the actual milk types offered.

#### **Crediting Documentation**

A child nutrition (CN) label or a product formulation statement (PFS) is needed for any processed product that cannot be credited using the Food Buying Guide (FBG). It is important to save actual CN labels from the product package, rather than using crediting claims that are found online or on distributor's websites. When a CN label is not available, a PFS must be obtained from the manufacturer to show how the food contributes to the meal pattern components. More information on crediting documentation can be found on our [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

## Salad Bar Signage

It may be helpful to post signage on the salad bar that tells students what they are expected to select. This can assist students in selecting a reimbursable meal. Signage could include statements such as “4 carrots =  $\frac{1}{4}$  cup” or “Take 1 scoop of raisins.” The planned portion sizes for each item on the salad bar should be at least  $\frac{1}{8}$  cup. Most fruits and vegetables credit cup for cup, but leafy green vegetables credit as half the volume served. For example,  $\frac{1}{2}$  cup of Romaine lettuce credits as  $\frac{1}{4}$  cup dark green vegetable. Dried fruit credits as double the volume served. For example,  $\frac{1}{4}$  cup raisins credits as  $\frac{1}{2}$  cup fruit.

## Juice Limit

No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. It is possible to offer juice daily and meet the 50 percent juice limit if it is offered along with fruit (fresh, frozen, dried, or canned). Use caution when determining if students can select duplicate juice cups with meals. SP 10-2012, Questions and Answers on the Final Rule defines an “offering” of fruits or vegetables for the purposes of assessing the juice limit, as “the amount a child is able to select at a given meal, regardless of the number of options/variety of fruits or vegetables. The total amount of juice available at all meals over the course of the week (separately for lunch and breakfast) is then divided by this total fruit offering to determine the weekly juice offering. No more than half of the total fruit offering may be in the form of juice.”

When analyzing the juice limit, consider the total amount of fruit students are able to select each day and how much juice they have access to. Therefore, if 1 cup of fruit is offered daily in the form of  $\frac{1}{2}$  cup juice and  $\frac{1}{2}$  cup fruit, the students have access to 2.5 cups of juice and a total of 5 cups of fruit over the week

- 2.5 cups juice/5 cups fruit = 50%
  - In this situation, duplicates of juice are not allowed. If students are allowed to take duplicates, they have access to 1 cup of juice at breakfast each day, or five cups of juice over the week.
- 5 cups of juice/5 cups of fruit = 100%
  - Therefore, while students can take duplicate serving of the fruit at the discretion of the menu planner, they cannot take two juices. Use signage to communicate this to your students.

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

❑ **Finding:** Production records are intended to be useful tools to record information prior to production, during production, and following production. The production records on file are not being filled out completely. The planned number of servings were not filled in during the week of review. Grades 7-12 are currently being recorded together in one column on the lunch production record. Since there is no overlap in the meal pattern between grades 7-8 and 9-12, these grade groups must be recorded separately. Technical assistance was given on using a production record that is meant for three grade groups. Additionally, the serving sizes recorded on the salad bar production record should be cup measurements, rather than the number of pieces of vegetable that students are expected to take.

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.

**Corrective Action Needed:** Please submit one week of completed breakfast, lunch, and salad bar production records to show that all required information is being filled in daily.

❑ **Finding:** The Turkey, Ham and Cheese Rollups served during the week of review did not have a standardized recipe, and the Green Bean Casserole served on the day of observation had a recipe, but it was not standardized. Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. 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. Instructions for standardizing recipes and recipe templates 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>).

**Corrective Action Needed:** Please submit standardized recipes for the Turkey, Ham and Cheese Rollups and the Green Bean Casserole.

❑ **Finding:** On the day of lunch observation, the teacher working at the end of the line was not trained on Offer versus Serve (OVS) requirements. The staff member checking trays at the end of the line must know how to identify a reimbursable meal and must be able to send students back for more food if their meal is not reimbursable. Technical assistance was provided on allowing students to serve themselves some items on the main line, which would allow the food service director to move to the end of the line to check trays. Alternately, if teachers continue to be at the end of the line they must be trained on OVS requirements. There is an [Offer versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) webcast on DPI’s website that can be used for training (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).

**Corrective Action Needed:** Please submit a written statement describing how you will ensure that the staff member at the end of the line is trained on OVS.

❑ **Finding:** Dole fruit cups are offered daily at breakfast. The fruit cups weigh 4 ounces. Per the Food Buying Guide (FBG), canned fruit often needs to weigh more than 4 ounces to credit as ½ cup. For example, to determine the weight needed for a half cup of canned pineapple, see page 2-96 in the FBG: 106 ounces divided by 49.9 quarter cups per number 10 can = 2.12 ounces per quarter cup x 2 quarter cups per half cup = 4.2 ounces per half cup. However, during the on-site review the FSD measured a fruit bowl as ½ cup. For this to be acceptable, an in-house yield study may be done to document this finding. Information on an [in-house yield](#)



[study](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) can be found on our website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

**Corrective Action Needed:** Please complete an in-house yield study on the Dole fruit cups and submit the results.

❑ **Finding:** Two types of milk are offered at breakfast: skim chocolate and 1% white. Towards the end of breakfast service on the day of observation, the skim chocolate milk ran out and the last students did not have access to a variety of milk. It is a program regulation that students are able to select from at least two milk types. When this was brought to the teachers' attention, they immediately got another crate of skim chocolate milk. In the future, the teachers who are monitoring the breakfast line need to identify this on their own and fix the problem right away. Alternately, food service could send three types of milk for breakfast so that if one type runs out, students will still have the choice of at least two milk types.

**Corrective Action Needed:** No further action needed as the problem was corrected on-site.

❑ **Finding:** There was no signage posted at breakfast for grades 4-6. Breakfast signage is posted near the cafeteria, but grades 4-6 receive breakfast in the commons area, which is separate from the cafeteria. Signage must be posted to show students what they must select to have a reimbursable meal. It may be easiest to attach laminated breakfast signage to the cart used to deliver/serve breakfast in the commons. More information on signage, including printable posters, can be found on our [signage webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

**Corrective Action Needed:** Please submit a photo or a PDF file of the signage that has been posted in the commons area for breakfast.

#### Technical Assistance/Compliance Reminders: **Smart Snacks**

There are no competitive foods or beverages sold at Royall Intermediate School. If food service or any student organization starts selling competitive foods/beverages, or if any food/beverage fundraisers are held on the school campus during the school day, the Smart Snacks rule must be followed. You can find more information on the rule here on our [Smart Snacks webpage](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The district business manager does a nice job of managing the school nutrition fund in an appropriate manner. All expenses are allowable and accurate. Technical assistance was

provided during the review on how to manage catering expenditures for school groups to ensure that the revenue from these events meets USDA's non-program foods rule.

- 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. [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

#### Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot 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>). 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>
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter
  - Sample robo-call script
- 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 must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property unless the school is able to contact the household and return the funds. The DOR has [rules concerning unclaimed property](#) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

#### (TA)/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 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, "**This institution is an equal opportunity provider.**" Either of these statements must be in the same size font as the other text in the document.

##### And Justice for All Poster

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

##### Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program including administrative staff involved with the benefit issuance process and faculty members involved in meal counting at the POS.

### Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

### **On-site Monitoring**

#### **Technical Assistance (TA)/Compliance Reminders**

- Every school year, SFAs with more than one serving site must perform no less than one on-site review of the meal counting and claiming system including the readily observable general areas of review as identified under 7 CFR 210.18(h). For each school operating the NSLP and in 50% of schools operating the SBP administered by the SFA the review must be completed no later February 1. Technical assistance was provided during the review to the new FSD on completing the onsite monitoring reviews for each alternate serving site in the school.

### **Local Wellness Policy**

#### **Technical Assistance (TA)/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 2016-17 with full compliance of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the 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 the SFA complies with the policy.

#### Content of the Wellness Policy

At a minimum, the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.
- An assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Resources:

- 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](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

#### **Findings and Corrective Action Needed: Local Wellness Policy**

- **Finding:** The SFA's local wellness policy has not been updated since 2013. The 2013 policy meets some but not all requirements as stipulated above (1000). At the time of the onsite visit, the SFA had begun the process of updating the LWP to meet current regulations based on conversations and technical assistance provided during the pre-review.

**Corrective Action Required:** Please provide a timeline for updating your policy and/or provide a copy of the updated policy, if the board approves it prior to the corrective action date. Include a statement indicating how the district plans to invite and include stakeholders in the process, inform and make the policy and subsequent assessments available to the public and review and update the policy as required under USDA regulations.

#### **Professional Standards**

## Professional Standards: New Food Service Director Hiring Requirements

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff, which must be tracked.
- The district is to be commended for reaching out to the state agency prior to hiring a new director for the 2017-2018 school year to determine that the professional standards hiring requirements were met prior to making a hiring decision for the role of school nutrition director.

### Professional Standards: 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>).
- Technical assistance was provided during the onsite visit on the new [USDA Professional Standards tracking tool](https://pstrainingtracker.fns.usda.gov/) (<https://pstrainingtracker.fns.usda.gov/>).

## Food Safety, Storage and Buy American

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

[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](http://www.fns.usda.gov/ofs/food-safety-flashes)). The [Office of Food Safety](#) website ([www.fns.usda.gov/ofs/food-safety](http://www.fns.usda.gov/ofs/food-safety)) includes food safety resources.

### Food Safety Plans

- All schools must have a comprehensive, site-specific food safety plan on-site, which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)

### Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeeereportingagreementsupplement.pdf>).

- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

### **Findings and Corrective Action: Food Safety**

- **Finding:** The School Food Safety Plan included only limited information and was not up to date. Extensive technical assistance was provided during the onsite review, including current resources for updating and implementing an appropriate plan. [USDA Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles](https://fns-prod.azureedge.net/sites/default/files/Food_Safety_HACCPGuidance.pdf) ([https://fns-prod.azureedge.net/sites/default/files/Food\\_Safety\\_HACCPGuidance.pdf](https://fns-prod.azureedge.net/sites/default/files/Food_Safety_HACCPGuidance.pdf)). The new director, whom has only been in the district for less than two months, was receptive and eager to complete and implement an appropriate plan for the district.

□ **Corrective Action Needed:** Update the food safety plan as directed during the onsite review and submit three key sections of the plan including the Process 1, 2, 3 document, the food employee reporting agreement and one or two school specific SOPs as part of the corrective action process.

- **Finding:** SFA was unable to locate the previous sanitation inspection report. While the most current report from the most recent sanitation inspection conducted in October of 2017, was posted as required, reports from the previous year were not available for review.

□ **Corrective Action Needed:** Please contact the local sanitarian and request copies of the previous sanitation reports. Submit a copy of the inspection conducted in spring of 2017 as part of the corrective action process.

### **Buy American**

- 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.
- Agricultural products, which are processed and produced outside of the U.S., may be accepted with proof from the 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 the product received and the 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](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>) are found on the procurement webpage under Buy American.
- 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 noncompliant products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### **Findings and Corrective Action Needed: Buy American**

- ❑ **Finding:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:
  - Garlic Powder - China
  - Pumpkin - China

**Corrective Action Needed:** The FSD indicated these products were on the shelves at her hire date. Both products are outdated and will be discarded. All other non-domestic products were either items that are unavailable in the United States (mandarin oranges, Pineapple) or substitutes by the distributor, which included appropriate documentation to explain the substitution. No further corrective action is required.

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

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

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



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