

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

---

**School Food Authority: Necedah Area School District**

**Agency Code: 29-3871**

**School(s) Reviewed: Necedah Middle School**

**Review Date(s): 4/24-25/19**

**Date of Exit Conference: 4/25/19**

---

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage ([dpi.wi.gov/school-nutrition/training](http://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](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Necedah Area District 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, 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**

- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of

unpaid meal charges, but Wisconsin DPI requires source documentation of the student's previous eligibility.

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

- ❑ **Finding #1:** From the student sample reviewed for benefit's issuance, 1 student was extended free Direct Certification benefits from a sibling who attends a neighboring school without source documentation.

**Corrective Action Needed:** Please submit a statement, that when benefits extends from another LEA, source documentation will be attained.

### **Verification**

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

- 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 LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable, but these verifications are not considered part of the Verification sample. For more information, refer to the current [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>.
- Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year, and schools should remind families their children may become eligible for free meals if the household unit experiences a change in financial circumstances (i.e., household size goes up or income goes down). However, if benefits to a household have been terminated because of failure to complete the verification or verification for cause process and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in Assistance Programs at the time of reapplication [7 CFR 245.6a(f)(7)]. These are not considered new applications.

### **Findings and Corrective Action Needed: Verification**

- ❑ **Finding #1:** The applications chosen for verification did not have the confirming official signature recorded on the back of the application.

**Corrective Action Needed:** Please provide a statement that going forward, all applications chosen for verification, will be confirmed and have recorded on the back of the application the confirming official signature.

- ❑ **Finding #2:** The household selected for verification, did not respond to verification, and reapplied for benefits at a later date without submitting income documentation.

**Corrective Action Needed:** Please submit a statement of understanding that all nonresponse verified applicants must submit documentation before approval.

### **Meal Counting and Claiming**

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

- DPI has created [Field Trip meal resources](#) to help schools offer student meals every school day. Field trip meals must be charged to the student at the time of delivery of the reimbursable meal. If

students do not come to cafeteria to pick up field trip meals, they must be checked off as the student receives the meal.

- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission, and each site listed on Schedule A of your on-line contract must have its own edit check to view before claim consolidation.

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

- ❑ **Finding #1:** The SFA did not use the edit check/Accuclaim in its claim submission.

**Corrective Action Needed:** Please provide a statement that the edit check/Accuclaim will be used each month for claim submission.

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

### **Commendations:**

Thank you to the staff of Necedah Area School District for their time and cooperation during the Administrative Review. It was noted by the Food Service Director that breakfast participation has significantly increased since implementing second chance breakfast. Excellent work! The garden bar offers a nice, colorful variety of fruits and vegetables to students. Thank you for your hard work and dedication to your School Nutrition Programs.

### **Technical Assistance:**

#### *Documentation and Record Keeping*

Meal pattern documentation is required to be kept in order to demonstrate that meals meet both daily and weekly meal pattern requirements. Meal pattern documentation refers to the physical labels with nutrition facts and ingredients statements from the boxes, bags, cans, etc. that the food is purchased in. If products have a Child Nutrition (CN) label, the actual CN label and product information on the box must be kept as documentation. If products have a Product Formulation Statement (PFS) directly from the manufacturer, this information must be on file. If a USDA Product Information Sheet is used to credit USDA Foods (commodity or brown box) received, these should be kept on file as well. The mentioned documentation can be kept on file for each week in many different formats, such as the physical labels off of boxes, bags, cans, etc., pictures of the labels kept on a computer, scanned images of the labels kept in a binder or on a computer, etc. So long as all documentation is readily available onsite, the format in which it is kept is up to the School Food Authority.

#### *Standardized Recipes*

Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich). 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 food service 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. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

#### *Dietary Specifications*

For Necedah Middle School, the maximum ounce equivalents (oz eq) of weekly grain and weekly meat/meat alternates offered exceeded the maximum guidelines for the week of review. While maximums are not currently being enforced, the maximums are in place as a guideline for dietary specifications. If schools meet the minimum weekly requirements for grain and meat/meat alternate and do not exceed the maximum requirements, dietary specifications should be within the guidelines for 6-8 students provided on the [Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>).

The Weekly Nutrient Calculator can be used to analyze calories, saturated fat, and sodium values weighted over the week. When analyzing nutrients, remember that the values must be weighted according to popularity (how the menu planner plans for each item to be selected). This tool can quickly show both high and low menu items, as well as high or low days on the menu, making it quick to determine which days could be mixed and matched throughout the month. This tool can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage, under Menu Planning Tools (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools>).

#### *Garden Bar Signage*

Almost all foods on the garden bar are selected using tongs. A singular planned portion size is indicated on the main production record, however, students do not know what the planned portion size is for options on the garden bar. If a portioning utensil cannot be used to serve certain options, signage indicating the planned portion size can be helpful. Consider adding signage with pictures of what the planned portion size looks like. Examples of more signage and printable signage can be found on DPI SNT's [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage under the Salad Bar Signage heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

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

❑ **Finding #1:** Breakfast and/or lunch production records did not have the following information filled in or were missing the following categories based on the [Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) ("Must Haves and Nice to Haves") (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>):

- Menu type (lunch, breakfast, etc.)
- Menu item with recipe name/reference number or product name/description
- Planned serving size for each grade group
- Planned number of servings prepared
- Planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb. case, 2-96 count case)
- Planned serving size for condiments and any extra menu items
- Number of reimbursable and non-reimbursable (adult) meals planned and served
- Substitutions made to original plans
- Substitutions made for students with special dietary needs
- All menu items that are part of the reimbursable meal

Garden bar production records are required to have a planned serving size for each offering.

While there is no required production record template, there are some examples that may be used on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). For the middle school and high school shared service lines, the two grade group lunch production record is recommended and the one grade group breakfast

production record is recommended. For assistance with filling out the production record template, please review the [Instructions for Completing Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).

In addition, it is important to be specific on production records about the identity, brand, and description of the items served. For example, instead of “cereal” or “juice”, list all types/flavors of cereal and juice separately. “Cereal” or “juice” do not indicate exactly what was served. Fruit sizes (e.g. case count) should also be recorded.

**Corrective Action Needed:** Submit one week of completed production records for Necedah Middle and High School K-12 breakfast, Necedah Middle and High School 6-8 and 9-12 lunch, and garden bar production records with all of the production record “Must Haves” listed and filled in.

❑ **Finding #2:** Documentation provided for the week of review demonstrated that the 50 percent juice limit was exceeded at breakfast. At breakfast, students are able to only select 1-1.5 cups of fruit, dependent upon the fruit choices. Of these choices, students can select 1 cup of juice.

An offering of fruits or vegetables for the purposes of assessing the juice limit is defined as the amount a student 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 or vegetable offering to determine the weekly juice offering. No more than half of the total fruit or vegetable offering may be in the form of juice.

**Corrective Action Needed:** Submit a statement detailing how the weekly juice limit at breakfast will not be exceeded for the week of review and your plan for future service weeks.

❑ **Finding #3:** During on-site observation lunch and breakfast signage were present. However, lunch signage on the express line did not have the required Offer versus Serve (OVS) statement that students must select at least three full components. The signage did include a written in statement indicating that students must select ½ cup fruit, vegetable, or combination.

Breakfast signage did not include the required OVS statement that students must select ½ cup fruit, vegetable, or combination. Instead, the signage indicated that one fruit or juice must be selected. *Breakfast signage was updated and corrected while onsite, so no further action is required for breakfast signage.*

DPI breakfast and lunch OVS poster signage were provided to the Food Service Director during the onsite review.

**Corrective Action Needed:** Submit a picture of updated, posted lunch signage for the express line that includes the required OVS statement that students must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination.

❑ **Finding #4:** During lunch observation, four non-reimbursable meals were observed. All four non-reimbursable meals did not contain the required ½ cup fruit, vegetable, or combination under OVS. As a reminder, leafy greens credit as half the volume served.

One of the point-of-service staff indicated that they did not have OVS training. The [Offer Versus Serve Guidance Manual](#) and [Offer Versus Serve webcasts](#) (Offer versus Serve and Offer versus Serve - Meal or No Meal Lesson and Game) can be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).

**Corrective Action Needed:** Submit a brief explanation as to how breakfast and lunch OVS training plans to be conducted for point-of-service staff. Submit a signed training roster after the training has been completed.

*Fiscal action will be assessed for these 4 non-reimbursable meals.*

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

#### Commendations/Comments/Technical Assistance/Compliance Reminders

##### Annual Financial Report (AFR):

- All revenues and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](#) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>)
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
  - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
  - Under “Purchases Services”, you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
  - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

##### Allowable Costs

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [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, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). 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>

### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

- ❑ **Finding #1:** The district's written unpaid meal charge policy states "Reduced meal accounts will only be frozen at the discretion of the School Nutrition Coordinator." This would be considered a civil rights violation as the policy is not the same for all reduced students.  
**Corrective Action Needed:** Provide a timeline to update the written unpaid meal charge policy and distribute 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 nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>)

### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

- ❑ **Finding #1:** On the Annual Financial Report, nonprogram food expenses exceeded revenues by \$2,481.31 and nonprogram foods may never run in the negative without a transfer from the general fund to cover the loss.  
**Corrective Action Needed:** Please submit a statement that if nonprogram foods are negative at the end of the school year, a transfer will be made into food service from the general fund to cover the difference.
- ❑ **Finding #2:** The nonprogram food revenue tool submitted did not include all nonprogram foods as coffee, juice beverages, and breakfast entrees were missing.  
**Corrective Action Needed:** Please resubmit the nonprogram foods revenue tool including all nonprogram foods sold in the district.
- ❑ **Finding #3:** Extra condiments are listed on the nonprogram food revenue tool for \$.25 and condiments may not be sold separately. All condiments must be bundled with the items they are served with and must meet the Smart Snacks regulation  
**Corrective Action Needed:** Please submit a statement all nonprogram foods will meet the Smart Snacks regulation.
- ❑ **Finding #4:** Bundled second breakfasts are sold to students at second chance breakfast and bundled second meals may not be sold to students because they would not meet the Smart Snacks regulation. Each item must be sold a la carte and sold at nonprogram food prices.

**Corrective Action Needed:** Please submit a statement that no bundled second meals will be sold to students and all items will be sold individually and included in the nonprogram food revenue tool.

#### 4. GENERAL PROGRAM COMPLIANCE

##### Civil Rights

##### Commendations/Comments/Technical Assistance/Compliance Reminders

##### Processes for complaints

- All SFAs should have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if 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 Complaint Form](#) for assistance in filing these complaints [https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

##### 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>).

##### Findings and Corrective Action Needed: Civil Rights

- Finding #1:** SFA's Special Dietary Needs Policy states that student must have a disability and this is no longer true. All substitutions must be made that a medical practitioner requests.  
**Corrective Action Required:** Please provide a timeline for updating the above items in your policy.
- Finding #2:** SFA's Special Dietary Needs forms, with substitutions requests from a medical practitioner, must be kept in food service so correct substitutions may be made for the student.  
**Corrective Action Required:** Please provide a statement that a copy of all completed forms will be kept in food service.

##### Local Wellness Policy

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



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

At a minimum the wellness policy must include:

- 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](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)). Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

## Smart Snacks in Schools

### Compliance Reminder:

#### *Final Rule*

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 (midnight until 30 minutes after the instructional day). Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

#### *Fundraisers*

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

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

### **Technical Assistance:**

#### *Smart Snacks Product Calculator*

The Food Service Director checks Smart Snacks compliance using the [Alliance for a Healthier Generation Smart Snacks Calculator](https://foodplanner.healthiergeneration.org/calculator/) (<https://foodplanner.healthiergeneration.org/calculator/>). When evaluating chips with whole corn as the first ingredient, please evaluate these items as a grain, not a vegetable. More guidance can be found on the Smart Snacks Calculator when answering the series of questions when hovering over the blue circles with the cursor.

While there were calculator print outs for most items sold a la carte, not all items sold were evaluated. Please continue to keep Smart Snacks documentation up-to-date.

### **Findings and Corrective Action Needed for Smart Snacks:**

❑ **Finding #1:** There is a food vending machine in the cafeteria, not owned by food service, which is turned off until 2:30 pm. Therefore, this machine turns on before 30 minutes after the instructional day. In the vending machine, there is an option that is a string cheese and beef stick that are bundled together and sold at one unit price. This practice is not allowable under the Smart Snacks regulations as all individual food items sold must meet the Smart Snacks general standards and nutrient standards individually and must be sold individually, not bundled. If sold separately, these items meet the Smart Snacks regulations and the vending machine would be in compliance with the Smart Snacks regulations.

**Corrective Action Needed:** Submit a statement detailing Necedah Area School District's action plan and timeline for bringing the food vending machine into compliance with the Smart Snacks regulations.

### **Professional Standards**

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

#### **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, 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

### **Findings and Corrective Action: Professional Standards**

- ❑ **Finding #1:** Training is not being monitored on a tracking tool.  
**Corrective Action Needed:** Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

### **Food Safety, Storage and Buy American**

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

##### **Food Safety Inspections**

- Most recent Food Safety Inspections must be posted in publically visible location.

##### **Food Safety**

- 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 food service staff. 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>)
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, **classrooms**, or other locations outside the cafeteria.
- All equipment, dishwasher, and food temperature logs must be kept for one year after food safety inspection.

##### **Time/Temperature Control for Safety (TCS) Food**

- Milk and dairy products
- Shell eggs
- Meat (beef, pork, and lamb)
- Poultry
- Fish
- Shellfish and crustaceans
- Baked potatoes
- Heat-treated plant food, such as cooked rice, beans, and vegetables
- Tofu or other soy protein
- Sprouts and seed sprouts
- Sliced melons
- Cut tomatoes
- Cut leafy greens
- Untreated garlic-and-oil mixtures
- Synthetic ingredients, such as textured soy protein in meat alternatives

## Time as a Public Health Control

- When using “Time as a Public Health Control:”
  - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
  - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
  - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration or heat during service, including TCS foods on garden bars, all leftover TCS food must be discarded.
- **Breakfast in the Classroom utilizes Time as a Public Health Control, thus all unused product must be returned to the kitchen where it can be determined if the food may be reused or discarded.**

## Findings and Corrective Action: Food Safety

- Finding #1:** Most recent food safety inspection not posted in a publically visible location  
**Corrective Action Needed:** Please post the most recent food safety inspection in a publically visible location outside of the kitchen.
- Finding#2:** No annual food safety plan review completed.  
**Corrective Action Needed:** Review entire food safety plan and update Process 1, 2, 3 items as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review page.
- Finding#3:** Dishwasher temperature log not retained.  
**Corrective Action Needed:** Submit one month of logged dishwasher temperatures.
- Finding #4:** Because Breakfast in the Classroom items are held outside of mechanical heating or mechanical refrigeration, Time as a Public Health Control must be used.  
**Corrective Action Needed:** Develop a [Time as a Public Health Control SOP](#) and submit updated [Breakfast in the Classroom SOP](#) (<https://dpi.wi.gov/school-nutrition/food-safety>)

## Buy American

### Compliance Reminders:

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, to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

### Technical Assistance:

### *Non-Compliant Products Found Onsite*

The following products identified in Necedah Area School District's storage did not have proper labeling to identify the country of origin:

- Liquid butter alternative- MI
- Apple juice- NJ
- Frozen fruit juice- manufactured
- Vegetable juice blend- OH

In USDA Memo SP 38 -2017, any product that does not identify the country of origin requires certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products.

### *Achieving Buy American Compliance*

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51 percent of its agricultural food component, by weight or volume, from the U.S." This can be accepted in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the 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 prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are 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 the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (https://dpi.wi.gov/school-nutrition/procurement/procurement-manual). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

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

❑ **Finding #1:** Tomatoes, cucumbers, peppers, bananas, pineapple tidbits, black olives, and frozen broccoli were identified in Necedah Area School District's storage area as non-domestic. Necedah Area School District does not have Buy American – Non-compliant Lists or SFA equivalent form for these product.

**Corrective Action Needed:** Begin using Non-compliant Product List forms or SFA equivalent for tracking non-domestic products. Provide a copy of the completed forms for the non-compliant products, listed in the finding, as corrective action. The [template form](#) is located on

the Buy American Provision webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx>).

Carolyn Stanford Taylor, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. Her 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/agenda-2017) webpage ([dpi.wi.gov/statesupt/agenda-2017](https://dpi.wi.gov/statesupt/agenda-2017)).