

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Chetek-Weyerhaeuser Area School District

Agency Code: 3-1080

School(s) Reviewed: Roselawn Elementary School

Review Date(s): 2/20/18-2/21/18

Date of Exit Conference: 2/21/18

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

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

General Program Reminders/Updates:

GOALS

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

SOCIAL MEDIA

- Submit photos to the School Nutrition Team to be posted on the DPI SNT Facebook page, Twitter page or Instagram page. Send photos to Dana Colla at dana.colla@dpi.wi.gov.

SNSDC TRAININGS

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

Appreciation/Commendations:

Thank you to the Business Manager, Food Service Manager, Determining Official, Food Service Staff, Secretaries and District Staff for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. Thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

While working with the Food Service Manager, it was evident that the manager is passionate about providing high quality meals, training staff members, adhering to regulations, and continuously working to improve the meal programs. The Food Service staff were knowledgeable, welcoming, and clearly dedicated to their work, serving nutritious meals to students.

Thank you for all that you do to feed the students healthy meals! You are much appreciated!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

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

Technical Assistance/Compliance Reminders

- 249 eligibility determinations were reviewed; 3 errors were identified that will not result in Fiscal Action being taken.

Start Date of Eligibility

- The start date of eligibility for meal benefits is the date the application is approved by the Determining Official or the date Direct Certification is run. You may never backdate.

Disclosure

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

Transferring Students

- If a student had a free or reduced price meal eligibility at his/her prior school district, the school can provide a copy to the district the student is transferring in to.
- The start date of eligibility is the date the Determining Official reviews and determines the application, signing and dating it.

Categorical Eligibility Using an Application

- If a household submits an application that indicates a 10 digit case number for Foodshare (SNAP), W-2 Cash Benefits (TANF) or FDPIR, the box on the application indicating Categorical Eligible must be checked by the Determining Official. On the contrary, it does not need to be checked for Homeless, migrant, runaway or foster students.

Findings and Corrective Action Needed

- ❑ **Finding #1:** Three students from one household transferred into the Chetek – Weyerhaeuser Area School District. The household had submitted an application at the prior district, qualifying for reduced benefits. The current district only obtained a letter from the prior district noting the students' reduced eligible status, not getting a copy of the application on file.

Corrective Action Needed: Obtain a copy of the original application from the prior SFA and re-determine it to confirm the reduced-eligible status. **Completed on-site, no further action required.**

Verification

Technical Assistance/Compliance Reminders

- Verification can begin October 1, as the sample size determined for Verification is based on all applications on file approved for free and reduced price meal benefits as of October 1.
- If a student's status increases (changes from Reduced to Free) due to Verification, the status must be increased immediately or within 3 calendar days the date the notification letter is mailed to the household.
- 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.
- Backdating is not allowed.

Meal Counting and Claiming

Commendations

The correct reports are used to complete the monthly claims for reimbursement. The Breakfast and Lunch claims for January were done correctly with no errors.

Findings and Corrective Action

- ❑ **Finding #1:** Point of sale for the 4K and Kindergarten students at lunch is not completed uniformly by all teachers. Some teachers mark students off as taking a reimbursable lunch prior to getting the lunch, while others crossing student names off rosters. Educate the staff completing the point of sale of the reimbursable meals and have them check off the student on a roster check off sheet as the student takes the reimbursable meal, at the end of the line. Per the contract, the point of sale is at the end of the line.

Corrective Action Needed: Submit a sample copy of the roster check off sheet each staff member will be using and include a statement in writing as to how staff will be completing the point of sale specifically at lunch for the 4K and Kindergarten students.

- ❑ **Finding #2:** Point of sale for the 4K students at breakfast is done prior to the students getting a reimbursable meal. This is unallowable and the students should be checked off as taking a reimbursable meal at the end of the line or after they have received it. Educate the teachers completing the point of sale of the reimbursable meals and have them check off the student on a roster check off sheet as the student takes the reimbursable meal. The teachers will have to bring the roster check off sheet back to the kitchen to give to food service to enter in to the software system.

Corrective Action Needed: Submit a statement in writing as to how staff will be completing the point of sale specifically at breakfast for the 4K students.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Manager and Business Director of the Chetek-Weyerhaeuser Area School District and to the school nutrition professionals of Roselawn Elementary School. We

appreciate your time and efforts spent preparing for and participating in the onsite review. School nutrition professionals were kind and friendly to all students, greeting most by name. They worked efficiently in a small kitchen. Space in the cafeteria is used for an attractive meal service line, including colorful, lighted signage. The Food Service Director asked questions reflective of her strong understanding of program requirements. She also asked for feedback and suggestions to improve the administration and operations of child nutrition programs.

Technical Assistance and Program Requirement Reminders

Child and Adult Care Food Program (CACFP) Meal Pattern

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary 3 Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. The Golden Grahams cereal was above the sugar limit for the serving size. To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements.

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, breakfast bars, granola bars, and toaster pastries. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

On the day of review, a serving of eight pieces of popcorn chicken provided 1.25 ounce equivalents (oz eq) of meat/meat alternate (m/ma) and 0.5 ounce equivalents of grain. This serving meets the daily minimum requirements for grain but does not meet the daily minimum requirement for m/ma, a shortage of 0.25 oz eq.

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. Production records submitted before the onsite review were not filled in completely. During the onsite review, those same production records had been updated with some quantities and temperatures but were still considered not to be filled in completely. Continue working with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Use volume measures (such as cups) to record portion sizes of fruits and vegetables, and use weight measures (such as ounces) to record portion sizes of meat/meat alternates and grains.

Crediting information recorded on the production records was not consistently in agreement with crediting information on the supporting documentation, such as CN labels, product formulation statements, standardized recipes, or the Food Buying Guide. Including meal pattern contributions for specified grade groups on production records is not required, though it must be documented and available for staff.

The production record template currently in use is outdated and uses language that is no longer applicable (e.g. Enhanced Food Based Menu Planning). While there is no required production record template, there are some examples that may be used on our [Production Records webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). Templates were left onsite. A copy of the production record requirements (“Must Haves” and “Nice to Haves” list) can also be found at that link.

Recipes Breakfast Items

If it becomes too time- or labor-intensive to record breakfast item (e.g. cereal, juice, muffin, etc.) usage by type on production records, consider using recipes. Individual recipes document average breakfast item usage by meal and grade group. When a breakfast item recipe is on file, total usage must still be recorded on production records. Recipes must be updated twice per year or when students’ preferences change.

Special Dietary Needs

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

Crediting Documentation

Food manufacturers continually reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. These records should be reviewed and updated at least annually and as new products are purchased or substituted. Also, please be sure to discard any outdated crediting information for products that have changed or that are no longer purchased.

An outdated PFS for turkey gravy resulted in a crediting discrepancy. According to the most recent PFS and CN label, 4.16 ounces credits as 2.0 ounce equivalents. Older documentation stated each 4.0 ounce portion credited as 2.0 ounce equivalents. Based on updated crediting information, each 3.02 ounce serving credits as 1.25 oz eq rather than 1.5 as recorded on production records and the standardized recipe.

In-House Yield

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the school food authority’s next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG (e.g. 175 count

apples). [Specific and verifiable procedures](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf), which must be followed, are available on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy).

Signage

Signage is especially helpful when students are self-serving foods, such as broccoli, cauliflower, baby carrots, red pepper strips, and grapes on the garden bar. To better serve students who are still learning to read, consider adding pictures or preparing a model tray with the amounts of vegetables that the menu planner expects the students to take. Signage examples can be found on the [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage). Consider posting fillable signage at breakfast which lists four food items from three required components. Signage should specify how many each food item counts as and how many items from each component a student may select. Grain items crediting as 2.0 ounce equivalents may count as one or two food items at the menu planner's discretion.

Field Trips

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of potentially hazardous food, establishing a way for collecting meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf).

Findings and Corrective Action Needed

- Meal Pattern Finding #1:** Weekly minimum requirement for meat/meat alternate (m/ma) was not met for lunch during the review period. Turkey gravy contributed to a shortage of 0.75 ounce equivalents of K-5 weekly meal pattern requirement or 1.75 ounce equivalents of K-8 weekly meal pattern requirement.

Required Corrective Action: Please submit a statement describing how you will meet the weekly minimum requirement going forward. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

- Meal Pattern Finding #2:** Production records for breakfast and lunch for the review period are incomplete. All required information on the template must be documented for all menu items.

Required Corrective Action: Submit three days of completed production records for breakfast and lunch at Roselawn Elementary School. Include planned portion sizes for all items, as well as all other information on the "must haves" list.

- Meal Pattern Finding #3:** Insufficient crediting documentation for 175 count apples served during the review period.

Required Corrective Action: Complete an in-house yield and submit the results.

3. RESOURCE MANAGEMENT

Commendations

PLE Tool

- SFA is running the PLE tool correctly and adhering to the required lunch price increases every year by exceeding the necessary 10 cent weighted average increase.

Technical Assistance/Compliance Reminders

Adult Meal Price

- The Adult Meal Price is currently in compliance to cover the cost of an adult meal. Keep in mind that adults should get the same portions as a High School student. If you are giving an adult any more food than that, they should be charged extra.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).
- The SFA currently has a written unpaid meal charge policy in place which is adequately distributed to households but is not being enforced in the SFA. The SFA has plans to continue improving and revising the policy.
- Consider creating a less strict policy for the elementary students than the middle school/high school students.

Allowable Costs

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) may be found on the Financial Management webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>). A best practice is to continue to collect on the unpaid meal charges as long as you are able to and the student is still enrolled. If unable to collect, then a transfer is required to Fund 50 from Fund 10 or another non-federal fund.
- Per question 15 of the [Financial Q&A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf), student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>). Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50.

Refunds of Student Meal Accounts

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

Revenue from Nonprogram Foods

Commendations/Comments

- Using the Child Nutrition Program Report from the 16-17 SY and the below USDA Nonprogram Food Revenue Tool, the SFA is in compliance with the Nonprogram Food Revenue regulation.
- The SFA completed the DPI Nonprogram Food Price Calculator Tool and shows some of the a la carte options could be price higher than what they are currently at.
- The SFA provides meals for the daycare which is a nonprogram food as they are not being claimed.

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at the school district include: Adult Meals, Extra Entrees, Extra Milk, A la Carte, Caterings and Daycare meals.
- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#), located on the SNT website, feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation.

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

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

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed for all food service staff involved with the School Nutrition Programs. The PI 1441 form was completed correctly and prior to the October 31 deadline.

Technical Assistance/Compliance Reminders

Civil Rights Training

- Annually, civil rights training must be completed for all staff involved in the school nutrition programs. This includes non-nutrition staff members that may handle the administrative side of the programs.

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. 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. This [flow chart](#) gives

guidance on special dietary needs, as well (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

- 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.
- 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.
- “Peanut Free” and “Allergen Free” labeled tables are discouraged from use. Consider using “Peanut Aware” and “Allergen Aware” labels instead as you cannot guarantee the tables are free of peanuts or other allergens.

Local Wellness Policy

Commendations

The SFA does have a Wellness Policy in place and is in the process of being updated by NEOLA. Thank you for having a wellness policy on file and working to assure students are on the path for a healthy lifestyle.

Technical Assistance: Local 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. 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).

SFA is required to complete an assessment of the LWP:

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

SFA required to inform the public of the results of the most recent assessment:

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

DPI’s Team Nutrition has developed a toolkit and other resources to assist schools with building their [wellness policy](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). Schools can chose from several standardized language options in the toolkit that comply with USDA’s regulations and tailor it to their school needs.

Finding #1: The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](#)

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>).

Provide a timeline of when you plan to have the policy updated and compliant with the final rule.

The [Wellness Policy Builder](#) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy

(<https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1>).

Smart Snacks

Technical Assistance

There are two situations by which an organization may sell foods and beverages to students during the school day. The school day is defined as the period from the midnight before to 30 minutes after the end of the instructional school day.

1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards:
 - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
 - b. Exempt fundraisers cannot occur in the meal service area during meal times.
 - c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Professional Standards

Comments/Commendations

The Business Manager and Food Service Manager share the majority of the program duties.

The Food Service Manager is doing a wonderful job making sure staff are getting their required training hours throughout the school year, that pertain to their job duties. The Food Service Manager attends SNSDC classes to stay up to date on the regulations. Nice work!

Technical Assistance

Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.

- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action

- ❑ **Finding #1:** Training is not being monitored on a tracking tool. Clearly document all training information, the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff).

Corrective Action Needed: Include all current training hours for each food service employee onto the [DPI tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls) or create your own on a Google Sheet (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>). **Submit a copy of the tracking tool with trainings entered.**

Buy American

Technical Assistance

As part of Chetek-Weyerhaeuser Area School District's Procurement Review, SNT will check that the procurement manual includes language pertaining to Buy American. An additional attestation from food service's distributors and/or vendors may be required. Further information, including the Non-Compliant Product List template, is available on the USDA Foods [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Six products, canned pineapple from the Philippines; canned mandarin oranges, fruit cocktail, and sliced apples from China; canned diced beets from Canada; and frozen cauliflower from Mexico were identified during the onsite review as non-domestic products without noncompliant product documentation.

Food Safety and Storage

Commendations

- It was evident during meal observation that staff members are well-trained on food safety procedures and effectively implement the food safety plan.
- A site-specific food safety plan was available at the reviewed school. It was clear that the plans are reviewed and updated regularly.

- Temperature records were well-kept, detailed, and available at the reviewed site.
- The food safety plan contained all required documentation including the equipment list, a list of the process 1, 2, and 3 foods, and site specific standard operating procedures.

Findings and Corrective Action

- ❑ **Finding #1:** The most recent Food Safety Inspection was not posted at Roselawn Elementary School.

Corrective Action Needed: Post the most recent Food Safety Inspection on a bulletin board in the hallway or in the hallway outside of the cafeteria for the public to view. **Submit a statement in writing this has been completed.**

- ❑ **Finding #2:** Standard operating procedures (SOPs) regarding Breakfast in the Classroom, Field Trips, and Time as a Public Health Control for TCS Food are not included in the food safety plan at Roselawn Elementary. SOPs are required for all applicable programs and processes occurring at the site.

Corrective Action Needed: Create or adapt SOPs (from the [SNT website](#)) to reflect *site-specific* procedures—particularly referring to Breakfast in the Classroom, Field Trips, and Time as a Public Health Control for TCS Food at Roselawn Elementary School. At Roselawn Elementary, TCS food (cheese sticks) is removed from temperature control (mechanical refrigeration) and put onto the serving line without any ice or mechanical refrigeration. This requires a site specific SOP for the use of **Time as a Public Health Control**. Time as a public health control is used when hot or cold food is removed from temperature control for display or sale. The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold 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. Work with your local sanitarian to create/edit these 3 SOPs. **Submit a copy of the 3 updated SOPs for Roselawn Elementary regarding Breakfast in the Classroom, Field Trips, and Time as a Public Health Control to the DPI Nutrition Program Consultant via email.**

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All documents pertaining to the School Nutrition Programs must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain. In other words, keep all documents for 3 years plus the current school year.

School Breakfast Program (SBP)

Technical Assistance

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

Summer Food Service Program (SFSP) Outreach

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round, even though a summer feeding program is operated at Chetek-Weyerhaeuser Area School District during summer school.

USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

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

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program

Commendations

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

Findings and Corrective Action

- Finding #1:** The WSDMP contract on file is outdated.
Corrective Action: Complete a new WSDMP contract and send to the consultant for review.
- Finding #2:** The milk served to students for the WSDMP is not from milk produced in Wisconsin. Refer to question 12 of the [WSDMP FAQ](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf). All or part of the raw milk used by the milk processor must be produced in Wisconsin.
Corrective Action: Contact your milk distributor to verify where the milk is produced, if it is not from Wisconsin, submit a statement of how and when you plan to purchase milk partly or all produced in Wisconsin for the WSDMP. Include that stipulation the next time you submit a milk bid.
- Finding #3:** The students are not being marked off as they take a milk. Teachers need to use a roster check off sheet and check off students as they take a milk to ensure the correct number of milk served are counted and claimed. This is also to be sure that the correct student is charged for a milk. Then they can enter the milk taken for WSDMP into the software system.
Corrective Action: Submit a statement in writing as to how the teachers will be handling the Point of Sale for WSDMP.

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

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

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



With School Nutrition Programs!