

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

School Food Authority: Belmont Community School District

Agency Code: 330364

School(s) Reviewed: Belmont High School

Review Date(s): February 26, 2019 – February 27, 2019

Date of Exit Conference: February 27, 2019

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 Belmont Community 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 willingness of the staff to make changes to meet school nutrition program regulations. It was obvious the staff at Belmont High School cares for the well-being of their students. They served a great meal, always with a smile, and have a great relationship with the students. We especially enjoyed the fun cafeteria atmosphere and we were impressed with how well the students understood what makes a meal. Awesome job and thank you for what you do for kids!

The DPI review team feel confident that Belmont Community School District will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

Ninety (90) eligibility determinations were reviewed, with zero errors identified. Great job processing applications and running direct certification within the required timeframes.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- 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:

1. The district is providing fee waivers for students receiving free and reduced priced meals without obtaining written parental consent.

2. Local officials with access to free and reduced data do not have USDA disclosure agreements on file.

Corrective Action Needed:

1. If the district will continue to provide fee waivers, include a [Sharing of Information Form](#) with the application packet for parents to sign (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>). Submit a written statement explaining how the district will handle free and reduced data disclosure moving forward.

2. Submit copies of the signed [disclosure agreement form](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>) for anyone working outside of food service, who will need access to this information. The goal is to limit the number of people who need to know this information and make sure these individuals understand the consequences of improper sharing/release of this information.

Note: aggregate data (just F/R numbers or percentages without a connection to individual names does not require prior parental sign-off before sharing and often times satisfies the request).

Meal Counting and Claiming

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

- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](#) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance including field trip meals. Students with field trip meals may not be marked as taking a meal or charged for the meal until the actual point of service.

Findings and Corrective Action Needed: Meal Counting and Claiming

- **Finding #2:** When a student receives a field trip meal, it is entered into the POS system when the meal is requested.

Corrective Action Needed: Submit a statement of how student field trip meals will be marked as the student receives the meal and how this will then be entered in the POS system.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you for Belmont Community School District’s Food Service Director, whose organization and diligence made for an efficient review. The Food Service Director has a good working knowledge of the meal pattern for all age/grade groups. The Food Service Director trains the point of service staff to correctly administer Offer versus Serve

Comments/Technical Assistance/Compliance Reminders

During the Administrative Review of Belmont Community School District (High School) it was not deemed necessary to conduct a weighted nutrient analysis of one week of lunch menus. In a nutrient analysis, the Public Health Nutritionist would determine if the average lunch meal was between 750-850 calories, less than 10% of the calories were from saturated fat, the average meals was less than 1,230 mg of sodium and no trans fat were present. Based on the maximum meat/meat alternate equivalencies exceeding the goals of 10 oz eq weekly, it is likely that calories would exceed the maximum allotment of 850 calories and saturated fat would exceed 10% of total calories. While no corrective action will be assigned, our School Nutrition Team encourages the Food Service Director and menu planners to be

mindful of the amount of meat meat/alternate offered to students on a daily basis. For example, on cheeseburger day, it is not necessary to provide 2 burger patties and 1 slice of cheese.

Technical assistance was also provided on the Taco Day menu, as 1.0 oz eq of grain was provided from the chips with the remaining 1.0 oz eq grain planned as 2 servings of croutons in order to fulfil the daily minimum of 2.0 oz eq. It is not well advertised nor is it the true intention of the menu planner that students select 1.0 oz eq of croutons with the taco meal. It was discussed adding ½ cup of rice to the menu in order to satisfy the daily requirement.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ Finding #1: Signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination.

Corrective Action Needed: Post signage in a location visible to students and send a picture to the Public Health Nutritionist.

❑ Finding #2: The printed menu is missing the milk choice.

Corrective Action Needed: Please update the printed menu clarifying varieties of milk offered and send to the Public Health Nutritionist.

❑ Finding #3: Recipes are missing key information and are not standardized to the current operation. Recipe standardization ensures that each meal is consistently planned to meet the daily and weekly requirements. Continue to work towards recipe standardization and use all resources available to you. Visit our [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional tools and resources (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Corrective Action Needed: Update the BBQ on a bun recipe to reflect actual ingredients used, scoop sizes, intended portion size, and all required steps in the cooking process. Please also create standardized recipes for the deli sandwiches.

The recipe standardization process make take several times producing the menu item to make sure it comes out the same way. This requires organized record keeping throughout the process. It is expected that the Food Service Director will continue to update recipes as needed.

❑ Finding #4: Missing crediting information on menu item. The macaroni and cheese product is written in the production record with ½ cup as the portion size. It is unable to be credited in ounce equivalencies without knowing the weight of each ½ cup.

Corrective Action Needed: The next time the macaroni and cheese is menued, please weigh the ½ cup volume measure. Using that weight, determine how it credits toward the meal pattern knowing that 6.0 ounces of USDA Foods Macaroni and Cheese contributes 2.0 oz eq meat/meat alternate and 1.0 oz eq grain.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

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

Annual Financial Report (AFR)

- All revenues and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- 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” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “nonprogram foods”, report 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, a la carte, and caterings would also be included here.
 - When revenues are recorded from the federal reimbursement payments, 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 an NSLP food expenditure for private schools and a purchased service for public schools.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly defined policy that addresses unpaid meal charges. The content of the policy is local discretion; however, best practice allows children to receive the nutrition they need to stay focused during the school day, minimize identification of children with insufficient funds to pay for school meals, and maintain the financial integrity of the nonprofit school food service account (NSFSA). SFAs must also include policies regarding the collection of delinquent meal charge debt.
- 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>
 - 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 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](#) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- **Finding #3:** Annual Financial Report does not have any revenues or expenses allocated to nonprogram foods and the SFA sells adult meals, second entrees, Wisconsin School Day milk and extra milk.
Corrective Action Needed: Provide a statement going forward that all nonprogram food expenses and revenues will be broken out from NSLP and allocated to the nonprogram foods line on the annual financial report. We have a [resource](#) on our website to aid you in this calculation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).
- **Finding #4:** Wisconsin School Day Milk Program revenues and expenses are not being recorded correctly on the annual financial report.
Corrective Action Needed: Provide a statement of how the WSDMP milks will be recorded on the annual financial report going forward.
- **Finding #5:** Student lunch account deposits are being recorded as revenue and refunds are being recorded as an expense on the Annual Financial Report.
Corrective Action Needed: Describe the accounting practice for student meal deposits and refunds that you will use going forward.
- **Finding #6:** The SFAs unpaid meal charge policy is not clearly defined.
Corrective Action Needed: Please develop a timeline for developing a more clearly defined, written unpaid meal charge policy. Submit a statement of how the policy will be distributed to all households and staff responsible for enforcing the policy.

Revenue from Nonprogram Foods

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

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Catering.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- **Finding #7:** The Nonprogram Foods Revenue Tool has not been completed for the current school year.

Corrective Action Needed: The USDA nonprogram foods tool was completed onsite. No further action is required.

- **Finding #8:** Many items sold to outside organizations or for catering purposes are being sold at invoice cost or at a very low markup when all costs for non-program foods, including food, labor, equipment, and purchased services must be covered so student meals are not subsidizing non-program foods. The nonprofit foodservice account cannot be used as a 'pass-thru' account.

Corrective Action Needed: Submit a statement of how you plan to make sure all non-program food costs are covered and a timeline of when new guidelines will be in place.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

Nondiscrimination Statement

- When including the [non-discrimination statement](#) it is necessary to use the current statement (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” The statement format cannot be altered and the font must be the same size font as the main text in the document.
- Some examples of informational materials that require the Nondiscrimination Statement:
 - School websites
 - Letters pertaining to the food service program
 - Menus
 - Advertisements
 - Parent/student handbook
 - Employee/volunteer handbook
 - Newsletters

Civil Rights Training

- Thank you for having all appropriate staff complete the civil rights training and having documentation available for review.

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. 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.

Findings and Corrective Action Needed: Civil Rights

- **Finding: #9.** The notification letters for free, reduced and denied meals do not contain the correct USDA non-discrimination statement (NDS). 2. The menu does not contain the correct NDS. 3. The NDS is required to be on the website.

Corrective Action Required: Please add the correct non-discrimination statement (NDS) to all required materials. Add the NDS to the website area associated with school meals. It is also recommended to add to complaint policy #870. Submit the corrected notification letters and menu. Submit a screenshot of the NDS on the website.

Local Wellness Policy

Commendations/Comments/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.

Content of the Wellness Policy

Resources:

- Please refer to the USDA [summary of the requirements](#) for local school wellness policies (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](#) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- 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>).

Findings and Corrective Action Needed: Local Wellness Policy

- **Finding #10:** SFA LWP meets some but not all requirements.
 1. **Policy Leadership:** SFAs are required to identify an official responsible for oversight in the written policy. This can be a specific position/title instead of a specific name.
 2. **Public Involvement:**

- SFAs are required to actively seek members for the wellness committee that represent a diverse group and allow them to participate.
 - SFAs are required to include language in the policy pertaining to allowing the public to participate in the development, implementation and review of the LWP.
 - SFAs are required to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are encouraged to use various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>).
3. **Foods Sold Outside School Meals:** SFAs must adhere to Smart Snacks and include language related to this in the written policy such as *'all food and beverages sold outside of the school meal programs shall meet the standards established in USDA's Smart Snacks Rule'*.
 4. **Triennial Assessment:**
 - SFAs are required to include language in the LWP regarding the completion of an assessment every three years.
 - 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 webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>).
 5. **Update/Inform the Public:** The written LWP must include language specifying how the SFA will update and inform the public about the content and amendments of the policy.
 6. **Food and Beverage Marketing:** SFAs may only market products that adhere to Smart Snacks guidelines during the school day and are required to include language related to this in the written policy such as "all food or beverage products marketed to students and/or depicted on items/equipment on the school campus, during the school day, must meet Smart Snacks nutrition standards".

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule.

Recommendations for updating the policy:

- Identify specific goals for Nutrition Education, Nutrition Promotion and Other School Based Strategies for Wellness.
- **Finding: #11.** The Pepsi cooler located outside the main office contains a graphic of a bottle of soda.
- Corrective Action Required:** Ask your Pepsi representative to provide graphics for products that meet Smart Snacks guidelines.

Smart Snacks in Schools

Comments/Technical Assistance/Compliance Reminders

Foods and beverages sold to students during the school day that is intended to be consumed during the school day are subject to the nutrition standards outlined in the All Foods Sold in School Rule which was finalized in 2014. Foods sold to students need to meet calories, sodium, and fat restrictions while beverages are also monitored for portion size, calories and caffeine content. During the Administrative Review, the SFA's a la carte items, vending machines, and fundraisers are examined to ensure compliance.

SFAs in Wisconsin are offered an exemption related to fundraisers. Each student group may host two fundraisers per school year that are exempt, meaning the food items sold to students do not have to meet nutrition standards. It is required that one person at the SFA maintain a tracking sheet of all fundraisers during the school year. Both electronic and printer friendly documentation is available at the [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>)

Findings and Corrective Action Needed: Smart Snacks

❑ Finding #1: Non-compliant beverages in the vending machine. If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie (≤ 5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (< 5 kcal/8 fluid oz; ≤ 10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable.

The vending machine currently has seven beverages that are allowable for 9-12 grades only. The Diet Pepsi, Diet Mt. Dew, Kick Start, and Cold Brew Coffee have been accurately programmed to be unavailable for purchase until 3:25pm. However, the 12 fl oz G2, low-calorie Propel, and caffeinated black tea are able to be purchased by students during the school day.

Corrective Action Needed: Please communicate in writing to your vending machine operator of this error. Upon receiving a response that the programming will be corrected to only allow beverages compliant with the 6-8 grade Smart Snacks standards during the school day plus 30 minutes after the bell rings, please forward to the Public Health Nutritionist.

Professional Standards

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

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 must clearly document all required training hours including employee name, title of training, training source, dates and total training hours. Certificate of attendance is encouraged but not required. 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
- Non-foodservice staff responsible for benefit issuance and point of service
- 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: Professional Standards

- **Finding #12:** Training is not being monitored on an acceptable tracking tool.
Corrective Action Needed: Develop a training tracker for all foodservice employees and non-foodservice employees responsible for benefit issuance and point of service.

Food Safety and Storage

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

Temperatures

- All temperatures, sanitizing concentrations and thermometer calibration are taken consistently.
Great job!

Food Safety Plans

- The Food Safety Plan was available for review. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- 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

- It is best practice to have all employees associated with meal service sign a [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- 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 #13:** Standard operating procedures (SOPs) are not site-specific.
Corrective Action Needed: Remove SOP #18 (transporting...) and add SOP for Field Trips. Provide a statement of when the Food Safety Plan will be updated to be site specific.

Buy American

Comments/Technical Assistance/Compliance Reminders

The Buy American Provision is a procurement standard that SFAs must comply with when purchasing commercial food products. It requires SFAs to purchase domestically to the maximum extent practicable. The Food Service Director has the capability to distinguish what products are Buy American compliant and which are not during the ordering process through Reinhart's online system. The Food Service Director uses this information to purchase domestically as often as possible.

Findings and Corrective Action Needed: Buy American Provision

❑ Finding # 1: Items purchased for school food service are not produced or packaged in the USA.

Corrective Action Needed: Please complete the Noncompliant Product List tracking form when non-domestic items are purchased. Please complete for three products and send to the Public Health Nutritionist. They can be found on the [Buy American webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american): (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>)

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

Breakfast Promotion

Information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Thank you for providing outreach for summer meals. Even though a summer feeding program is not operated at Belmont Community School District, please continue to inform families of where 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>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

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

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5th grade.
- Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one.

Findings and Corrective Action: Wisconsin School Day Milk Program

- **Finding #14:** There was an under-claim of 72 milks in the WSDMP.
Corrective Action Required: Provide a statement of how you will ensure accurate milk counts will be claimed going forward.

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/every-child-graduate) webpage (https://dpi.wi.gov/statesupt/every-child-graduate).”



With School Nutrition Programs!