

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

School Food Authority: School District of Prairie Farm

Agency Code: 34557

School(s) Reviewed: Prairie Farm Middle School

Review Date(s): May 14-15, 2018

Date of Exit Conference: May 15, 2018

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 Prairie Farm 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 support of the administrators at Prairie Farm to ensure students are served through the school nutrition programs and the eagerness of the staff at Prairie Farm for their willingness to make changes to meet school nutrition program regulations.

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

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households

that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year.
- Prairie Farm School District had a 5 % (from SFA-1) certification error rate. More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA.

Findings and Corrective Action Needed: Certification and Benefit Issuance

175 names on the benefit issuance list were reviewed.

- **Finding:** The following application errors were identified during the review.
 - Two students were approved to receive free meal benefits when they should have been approved to receive reduced benefits due to income being missed when calculating total income.
 - Two students were approved to receive free meal benefits when they should have been approved to receive reduced benefits due to income being missed when calculating total income. On 1-25-18 the students began receiving free meals due to direct certification; therefore, the ineligible meals were from 9-1-18 to 1-24-18.
 - One student was determined as reduced despite her siblings receiving free benefits based on direct certification.
 - One application was approved for reduced priced meals without the signature of an adult household member.

Corrective Action Needed: Correct the errors and notify the households of benefit changes starting 10 operating days from the date of the letter. The households new eligibility will be in effect for the remainder of the school year and up to 30 days into the new school year. Submit documentation showing the change has been made on the 10th operating day on the benefit issuance list.

Note: The error rate for this AR will require the district to conduct an independent review of applications during the 2018-2019 school year.

Verification

Commendations/Comments/Technical Assistance (TA)

- The verification process was done perfectly. Thank you for your commitment to submitting error free claims.
- Just a reminder that the role of the confirming official is to review those applications selected for verification. 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.

Meal Counting and Claiming

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

- The meal counting and claiming was done correctly and no errors were found. Thank you for your commitment to submitting error free claims.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of Prairie Farm School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. The Food Service Director was receptive to feedback, both positive and constructive criticism. She also asked questions reflective of her desire to better understand and comply with school meals program regulations.

Technical Assistance and Program Requirement Reminders

School Breakfast Program

An item at breakfast is defined as 1.0 ounce equivalent (oz eq) grain, 1.0 oz eq meat/meat alternate (m/ma), 1/2 cup of fruit and/or vegetable, or 1 cup of milk. Under Offer Versus Serve (OVS), four food items must be offered at breakfast, and students must select at least three food items, including 1/2 cup fruit, vegetable, or combination, to have a reimbursable meal.

At the time of onsite review, grain food items (e.g. oatmeal bars, toaster pastries, cereal bars, and breakfast rounds) sold a la carte at breakfast credited towards the breakfast meal pattern but were not intended for reimbursable breakfasts by the menu planner. Consider offering these grain food items as choices for reimbursable breakfasts to increase variety for students and to increase School Breakfast Program participation and reimbursements. Use signage to help students accurately select reimbursable breakfasts by indicating clearly how many items from the required (e.g. grain, fruit, milk) and optional components (e.g. vegetables, m/ma) must be taken.

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. Refer to the [Milk Recipe Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milkrecipe_0514_2.doc) for instructions and examples which may be adapted (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milkrecipe_0514_2.doc).

Signage

Adequate signage helps students accurately select reimbursable meals by indicating how many items at breakfast or components at lunch must be taken to constitute a reimbursable meal. Printed 8.5" x 11" signage was posted on the meal service line, and handwritten sandwich board signage was stationed near the trays and utensils. It may benefit students to reposition printed signage closer to the beginning of the meal service line.

Handwritten sandwich board signage was filled in with the daily menu. However, breakfast signage did not specify the number of food items that each menu item was planned as nor the number of items from each component that students could select. Lunch signage did not specify the offered components.

If you are interested in ordering signage from SNT, please visit the [Team Nutrition webpage](https://dpi.wi.gov/team-nutrition) (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

Vegetable Subgroup Requirements

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each meal service line must be planned to meet the daily as well as weekly meal pattern requirements, including vegetable subgroups. This guidance can be found in the following documents.

DPI SNT's [Lunch in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf)

Each serving line must meet the daily and weekly requirements, including vegetable subgroups, independently. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>).

[Memo SP 10-2012 \(v.9\) Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs"](#)

2. When multiple serving lines are used in a school, must each line meet the weekly vegetable subgroup requirement?

Yes, in most cafeteria set-ups. As required in Section 210.10(k)(2), each independent line must meet the daily and weekly requirements (including subgroups), in order to ensure that a child is able to take a reimbursable meal every day in any line they may choose. (pg. 37) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf>).

There are two meal service lines for lunch at Prairie Farm Middle School. Students move freely between meal service lines, providing access to a variety of vegetables from all subgroups per weekly meal pattern requirements. Consider offering a variety of vegetables on *each* meal service line to increase the likelihood students will select vegetables from multiple subgroups without visiting multiple meal service lines.

Crediting Grains Using Exhibit A

[Exhibit A](#) is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1.0 oz eq for each specific group (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf). Exhibit A groups all grain products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:

- Group A: these products are hard and crunchy, dry and lightweight. Per ounce, they contain a good deal of grain.

- Group B: whether serving bagels, pizza crusts or tortillas, 1.0 ounce of these products all credit the same towards the meal pattern (1.0 ounce by weight equals 1.0 oz eq grain).
- Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1.0 ounce of pancake does not credit as 1.0 oz eq like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz eq grain.

Exhibit A can be used to credit any of the products that appear in the table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

Grain-Based Dessert at Breakfast

Grain-based desserts are designated with a superscript 3 or 4 on Exhibit A. Desserts marked with superscript 3 must be limited to lunch only and may never be credited or offered at breakfast. There is no limit to the quantity of grain-based desserts designated with superscript 4 that are served at breakfast.

Production Records

The breakfast and lunch production record templates currently in use are missing required information, such as recipe name/reference number or product name/description, planned number of portions, and total number of purchase units and total number of portions prepared (not separated). While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements (“Must Haves and Nice to Haves” list) was provided to the Food Service Director while onsite.

Be specific about the identity, brand, and description of the items served. General descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records to accurately reflect portion sizes and crediting. Fruit sizes (i.e. case count) should also be recorded.

Standardized Recipes

Use of standardized recipes is another important part of child nutrition programs. Any menu item that has more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen. Recipe standardization will be a continuous work in progress as you modify older recipes and update with current ingredients in stock.

Visit our [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>) or [contact a Public Health Nutritionist](https://dpi.wi.gov/school-nutrition/directory) for assistance (<https://dpi.wi.gov/school-nutrition/directory>). We encourage viewing [the webcast, What's the Yield with Standardized Recipes?](http://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

[USDA's What's Cooking? recipes](https://whatscooking.fns.usda.gov/) include nutritional and crediting information. They are a great resource to use in child nutrition programs (<https://whatscooking.fns.usda.gov/>). Please note, even though USDA calls these standardized recipes, they are in fact quantity recipes. These recipes will only be standardized once they have been tried, tested, and adapted to your food service operation.

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. Discard any outdated crediting information for products that have changed or that are no longer purchased.

National School Lunch Program (NSLP)

Meal Service

Even young children are capable of serving themselves based on their likes and dislikes. Training and teaching are needed initially to help this change happen effectively, but just like anything else that happens in a school, it can be taught.

Choices

Refer to page 111 of [Successful Menu Planning: USDA Nutrition Standards for School Meals from UC Davis](#) for menu design and menu planning steps to offer choices (https://cns.ucdavis.edu/sites/g/files/dgvnsk416/files/inline-files/smp_participant.pdf). According to the publication, “Plan to offer choices in some menu categories regardless of school size.”

Farm to School (F2S)

Farm to School combines local procurement with nutrition education for students through activities such as taste testings, school gardening, and farm visits. Wisconsin Farm to School connects local and regional food vendors and producers with Wisconsin schools to introduce fresh, healthy foods to students, strengthen their communities, and improve local economies.

There are a number of ways schools can implement Farm to School programs. Research has shown that the most beneficial impacts occur through the implementation of comprehensive Farm to School programs. However, impacts are seen at all levels of farm to school implementation, and even the smallest efforts can be a catalyst towards the broader movement. Comprehensive programs contain elements of strong local procurement, nutrition and agricultural education, hands-on learning, and school gardens but even beginning foundational programs are considered farm to school programs.

If you are interested in starting a Farm to School program at your school or district, please contact our Farm to School Specialists, [Ansley McLeod](mailto:Ansley.McLeod@dpi.wi.gov) (Ansley.McLeod@dpi.wi.gov) or [Dana Colla](mailto:Dana.Colla@dpi.wi.gov) (Dana.Colla@dpi.wi.gov) with questions. We also love sharing your success stories in our quarterly newsletter, so make sure to call or email with exciting updates on your Farm to School program!

Corrective Action

Meal Pattern Finding #1: Recipes for spaghetti with meat sauce, side salad, and chicken and noodles are not standardized to the operation.

Required Corrective Action: Submit standardized recipes for these three menu items, including serving size for single portion(s), total number of portions, and total volume or measure.

Meal Pattern Finding #2: The breakfast and lunch production record templates currently in use are missing required information, such as recipe name/reference number or product name/description, planned number of portions, and total number of purchase units and total number of portions prepared (not separated).

Required Corrective Action: Please submit updated breakfast and lunch production record templates which include the missing required information.

Alternatively, please submit a statement of intent to use DPI SNT production record templates beginning in SY 18-19. Production record templates are undergoing revision by DPI SNT; Microsoft Excel files will be posted to the [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).

Smart Snacks

Beverage Vending

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.

Documentation was provided for Powerade Zero, which is sometimes sold in the beverage vending machine in the cafeteria. Powerade Zero is non-compliant with Smart Snacks beverage standards for middle school students. Only bottled water was sold in the beverage vending machine at the time of onsite review.

Fundraisers

As food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales.

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 webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), under the resources heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Buy American

There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product
 - e. Distribution- record the reason the distributor carries the non-domestic product
 - f. Other- explain

You may record additional information if you find it beneficial.

A suggested template is posted on the [Buy American webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) (https://dpi.wi.gov/school-nutrition/procurement/buy-american) under [Buy American Non-Complaint Product List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).

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

- Garlic powder from China

Required Corrective Action: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)/Compliance Reminders

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) 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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- 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.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding:** Revenues and expenditures were not broken out by program and expense category on the annual child nutrition financial report.

Corrective Action Needed: Please submit a copy of the 17-18 Annual Financial Report with revenues and expenses broken out by program and category. The 17-18 Annual Financial Report is due on or before August 31, 2018. Instructions for completing the [Annual Financial Report](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are available at (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>). You are also encouraged to attend summer training on financial management. Courses are held throughout the summer in various locations as part of DPIs School Nutrition Skills Development Courses (SNSDC).

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), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

❑ **Finding:** The Nonprogram Foods Revenue Tool has not been completed for the current school year. **Corrective Action Needed:** Watch the [Nonprogram Foods Revenue Tool webinar](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html) and provide a copy of the completed quiz questions and a completed tool for Prairie Farm Intermediate School using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).

Comments/Technical Assistance (TA)/Compliance Reminders

- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
 - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance (TA)/Compliance Reminders

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

Special Dietary Needs

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

- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.
- Foodservice staff should not be calculating dietary requirements for students with diabetes, or other life altering conditions. This is outside of their scope of expertise and/or their role as the school foodservice provider. The role of food service is to provide a safe meal for students based on guidance from the student's health care team. This includes providing menus, recipes and product labels to the child's health care team and following instructions for each meal based on what the health care team determines is safe for that particular student.
- Schools should be working on a case-by-case basis to accommodate special dietary requests using a team approach consisting of food service, school nursing staff, school administrators, parents and students, if they are old enough to be involved.

On-site Monitoring

Comments/Technical Assistance (TA)/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](#) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

Findings and Corrective Action Needed: Onsite Monitoring

- ❑ **Finding:** The onsite monitoring visit was conducted on April 18 in preparation for the annual review.
Corrective Action Required: Provide a statement of intent to correct this and conduct Onsite Monitoring annually per USDA guidelines.

Local Wellness Policy

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

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice -](#)

[School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum 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).

Technical Assistance

- While the Prairie Farm school district policy technically includes requirements identified in the [wellness policy checklist](#) the policy is very general and does not indicate specifics on how the above requirements will be implemented (<https://dpi.wi.gov/school-nutrition/wellness-policy>). The policy as written does not clearly meet USDAs intent express the USDA's intent of School Wellness Policies. It is best practice to review the policy and add more language on how the ideas in the policy will be implemented.

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>).

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.
- 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>).

Findings and Corrective Action: Professional Standards

- ❑ **Finding:** All training hours have been completed by the staff and they have been tracked; however, the training log is missing the following required information: Title/Position; Employee status (full or part time, acting, substitute), including average hours per week for each employee; and professional standards employee category/position (Nutrition Program Director, Manager, Staff)
Corrective Action Needed: Use the DPI tracking tool to be sure you have all the required information or submit a copy of the corrected 'Training Log'.

Food Safety and Storage

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

Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.
- USDA requires that schools post their most recent sanitation inspection in an area that is assessable to the public.

Findings and Corrective Action: Food Safety

- ❑ **Finding:** Most recent food safety inspection report is not posted in a publicly visible location.
Corrective Action Needed: Completed on-site. No further action required.
- ❑ **Finding:** Although not cited by the sanitarian, it was noted during the onsite review that the school's HACCP plan included a SOP #10 *Storing Food* which states all food items should be stored 6" above the floor. During the onsite review it was noted that crates of milk were stored directly on the cooler floor in violation of the districts SOP. Best practice is to store the milk crates 6" above the floor. If the district chooses not to do this, the SOP needs to be changed to reflect the current practice.
Corrective Action Needed: Submit a detailed statement indicating the steps that will be taken to correct this error by either storing the milk crates 6" above the floor or submitting an updated SOP #10.

Is this a contracting or procurement issue that was NOT identified during the procurement review.

Corrective Action Needed: Contact Alex Zitske to discuss 608-267-9288 or alex.zitske@dpi.wi.gov.

Wisconsin School Day Milk Program (WSDMP)

Comments/Technical Assistance (TA)/Compliance Reminders

- Just a reminder, 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.
- The milk price should be figured by using a weighted average of milks served.
- Technical Assistance was provided at the time of the visit to update the Wisconsin School Day Milk Program. Please submit to Loriann Knapton.

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

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

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



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