

# USDA Child Nutrition Programs Administrative Review Summary Report

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School Food Authority: Merrill Public Schools

Agency Code: 353500

School(s) Reviewed: Maple Grove Elem. & Washington Elem.

Review Date(s): 11/27, 11/28, 11/29, 2018

Date of Exit Conference: 11/29/18

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

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

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the SFA and executive assistant to the SFA and also staff at Maple Grove & Washington Elementary for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The meals we observed were colorful, a great variety offered, and appealing to all students. The kitchens were clean, well organized and a very positive environment. The staff was also quite positive, and knew all students names at both schools we reviewed. The children seemed very happy to be in line for a healthy meal and a visit with the staff serving that meal! Great job in providing wonderful meals to your students!

## General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage ([dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training)).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).

- The US Department of Agriculture 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://www.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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

#### Commendations/Comments/Technical Assistance/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.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

#### Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at [karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov) for more information and approval.

## 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 the 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. 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.**

## Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

## Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

## Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the

agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.

- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

### Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

### Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

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

❑ **Finding #1:** Upon reviewing the sample pool of applications, many of the applications had missing information or unclear information. Applications had missing Household box numbers, or the numbers were incorrect and did not match to the amount of names listed. These are considered to be incomplete applications. However, in further checking these app's, it was also found that they were on Direct Certification prior to turning in an application, but nothing was marked on the application to show that. There were some with dates of DC, and some without dates. It was difficult to know whether they turned in an app before or after they were found on DC.

**Corrective Action Required #1:** Review the "Household Size Box" paragraph above, and also the "Incomplete Applications" paragraph above. When receiving an application, and then finding the name on a DC list, you must note "DC" on the application and also date it. These applications should be put into a separate file and kept per the record retention rule. Submit a statement of understanding that going forward, when processing applications, you will check all areas on the app for completeness "before" determining the benefit status of the applications.

❑ **Finding #2:** Many applications in the sample pool had the word Skyward listed on the back where the Determining Official is to sign.

**Corrective Action Required #2:** Watch the webcast on the DPI website for Processing Applications. The link is below. Submit a detailed statement showing that you have watched and understand the

process going forward. [https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html)

❑ **Finding #3:** The applications reviewed had all the incomes annualized. They should only be annualized when the income frequencies are different. If there are two incomes listed, and each are weekly, then they are to be added together and checked against the eligibility guidelines for determination. If there are two incomes listed and they are different frequency, such as monthly, and the other is bi-weekly, then they should be annualized and determined.

**Corrective Action Required #3:** Watch the webcast on the DPI website under the Training tab for Special Situations. Also watch the webcast for filling out the household application. These are both short webcasts. Submit a sample application filled in accurately, showing that you understand the process of how it is to be filled out by the school personnel. Also submit a statement explaining you understand the webcasts and going forward, how to determine an application correctly.

[Special Situations in the Free and Reduced Price Meal Eligibility Process](#)

[Filling out the Household Application for Free and Reduced Price School Meals](#)

## Verification

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

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

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

❑ **Finding #1** It was observed in reviewing the applications, that the Determining Official, Verifying Official, and Confirming Official roles are not being followed correctly. The persons designated on the School Nutrition Contract, are not signing on the correct line as their role shows on the contract. It appears to be the opposite.

**Corrective Action Required #1:** By watching the DPI webcast as outlined above in Finding #2 of the Certification and Benefit Issuance, it will help you understand your role as designated on the contract. Familiarize yourselves with the annual contract, and the pages that show whose role is the Authorized Rep, Determining Official, Verifying Official, Confirming Official, Submit a signed statement that you understand and will process applications correctly, and sign when needed on the appropriate lines on the reverse side of the application.

## **Meal Counting and Claiming**

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

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.

- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>.
- The meal counting and claim for the Review Month was conducted perfectly.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of Merrill Area Public Schools. We appreciate your time and efforts spent preparing for and participating in the onsite review. Meal pattern compliance documentation available both offsite and onsite was organized. Questions and concerns were responded to promptly, including noncompliance. The food service director was an active participant in the onsite review. She and the school nutrition professionals were receptive to feedback, both positive and constructive criticism.

### Technical Assistance and Program Requirement Reminders

#### National School Lunch Program (NSLP)

##### Maple Grove Elementary

At Maple Grove Elementary, the milk cooler was located across the cafeteria from the reimbursable meal service line. Students entered the cafeteria, input their PINs, and proceeded through the reimbursable meal service line. The school nutrition professional who served the entrée determined if each student selected a reimbursable meal before he or she had access to milk, which was not allowable. The milk cooler was relocated to the reimbursable meal service line, and subsequently, all students had access to milk as part of their reimbursable meals.

A variety of milk, at least two allowable milk types, is required to be offered daily at lunch and breakfast. Allowable milk types in Child Nutrition Programs include nonfat (skim) milk, flavored (e.g. chocolate, strawberry, etc.) or unflavored, and low-fat (1%) milk, flavored or unflavored. Milk types may also be lactose-reduced or lactose-free. Available milk types and actual usage by type (or a milk recipe) must be recorded on production records.

##### Washington Elementary

There are two lunch meal periods at Washington Elementary. Students in grade kindergarten through 2 ate first, and students in grades 3 through 5 ate second. During the first meal period, the custodian, who is trained in Offer versus Serve (OVS), determined reimbursable meals at the end of the fruit and vegetable bar. As the first meal period ended and the second meal period began, the custodian left the fruit and vegetable bar to clean tables and remove the trash. While he was performing these responsibilities, no one was determining reimbursable meals at the end of fruit and vegetable bar. Many students bypassed the fruit and vegetable bar altogether. On the day of review, chicken nuggets and French bread were offered in a paper boat with 1/2 cup of potato wedges, and all students selected reimbursable meals. However, the school must develop and implement a plan for determining reimbursable meals at the end of the fruit and vegetable bar during both meal periods.

### **School Breakfast Program (SBP)**

During breakfast meal observation at Washington Elementary, one student selected a non-reimbursable meal. The student selected one of two bundled menu items. While each menu item credited as 1 ounce equivalent (oz eq) towards daily and weekly meal pattern requirements, the bundled menu items counted as 1 food item towards a reimbursable breakfast. The student's tray contained 1 cup of milk, 1 French toast mini loaf, and 1/2 cup of applesauce; therefore, she did not have three food items when she left the reimbursable meal service line. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

### **Offer versus Serve (OVS)**

Rearranging the reimbursable meal service line for SBP at Washington Elementary may simplify selection of reimbursable meals by students. Two entrees planned, offered, and served on the day of review were placed at opposite ends of the reimbursable meal service line. Students who selected French toast mini loaf and string cheese received their entrees first, while students who selected cereal and graham crackers received their entrees last. Setup suggested the cereal and/or graham crackers were also available to students who selected French toast mini loaf and string cheese. This resulted in the school nutrition professional and food service director removing extra food items from students' trays before they input their PINs. Consider placing the fruit and vegetable food items first in the reimbursable meal service line, and add signage or color coding to the entrees (e.g. grain and meat/meat alternate food item(s)) to simplify selection of reimbursable meals.

Children must be offered each meal component in its full, planned portion size (e.g. 1/4 cup cauliflower, 1/4 cup cherry tomatoes, 1/2 cup banana, etc.) to comply with daily and weekly meal pattern requirements. Supervising adults may encourage, but not force, children to try components and accept full, planned portion sizes during meal service.

### **Standardized Recipes**

Standardized recipes are required for **all** menu items that have more than one ingredient (e.g. spinach dressed with ranch), including detailed information about the **specific** ingredients, equipment, and procedures used to prepare them. A standardized recipe has been tried, tested, evaluated, and **adapted** for use by your foodservice operation. Recipes developed by Taher, Inc. and utilized throughout Merrill Area Public Schools must be updated to accurately reflect what is happening in the school kitchens.

For example, at Maple Grove Elementary, Garden Salad (TAH 189) is often prepared with vegetables on-hand, which differ from vegetables listed on the standardized recipe. During lunch meal preparation observation, Garden Salad was prepared with spinach (rather than romaine lettuce due to a product recall) and red peppers, but not broccoli and tomatoes.

Furthermore, the Honey Mustard Ham Wrap (SAND 029ALA) recipe does not reflect current practices and products at Maple Grove Elementary or Washington Elementary. While the written recipe calls for a 12" Tortilla Wrap Whole Wheat, two slices of American cheese, and 3.75 ounces of sliced ham, the recipe preparation uses a 6" whole wheat tortilla, one slice of American cheese, and 2 ounces of sliced ham.

Standardized recipes produce consistent quality and yield every time when the **exact** procedures, equipment, and ingredients are used. This is critical for crediting school food service recipes, especially vegetable contributions to weekly subgroup requirements. The two examples above



illustrate the importance of updating recipes developed by Taher, Inc. to accurately reflect what is happening in the school kitchens.

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 (PFS), standardized recipes, or the Food Buying Guide (FBG).

For example, the Chef Salad (SAL 003) recipe calls for Hard Boiled Eggs (Large). According to the USDA *Food Buying Guide for Child Nutrition Programs*, a hard boiled large egg weighing 2.0 ounces credits as 2 oz eq of m/ma. Submitted crediting documentation for hard boiled eggs indicated each egg weighs 50 grams, which is less than 2 ounces. Therefore, each egg credits as 1.75 oz eq of m/ma. Per the recipe directions, each egg is cut into quarters, and each wedge credits as 0.25 oz eq of m/ma. This affects the Meal Pattern Requirement of the Chef Salad recipe, decreasing from 2.0 oz eq to 1.75 oz eq.

Additionally, the Chicken Caesar Wrap (SAND 032) recipe calls for Cooked 1/2” Diced Chicken. While the Meal Pattern Requirements were calculated based on diced chicken that credits ounce-for-ounce, the diced chicken that is purchased and utilized by the Merrill Area Public School District credits 2.3 ounces as 2 oz eq of m/ma. Therefore, 1.5 ounces of cooked diced chicken credits as 1.25 oz eq of m/ma, decreasing the Meal Pattern Requirement from 2.0 oz eq to 1.75 oz eq.

### **USDA Food Buying Guide for Child Nutrition Programs**

The [USDA Food Buying Guide for Child Nutrition Programs](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the FBG. After logging in to the FBG, click on “food items search” and type in a specific food in the “keywords” search box. Many different options may appear. Find the one that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.

Most fruits and vegetables credit by volume served, and the FBG will note if the crediting is different based on volume served (e.g. one medium banana credits as ½ cup fruit). Reference the SNT [Half-Cup Crediting of Fruits and Vegetables Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) for amounts required to credit as 1/2 cup as well as suggested serving sizes (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>).

### **Crediting Documentation**

Any processed product that is not listed in the FBG requires a current Child Nutrition (CN) label or a detailed PFS to credit toward the meal pattern. A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson). If a processed item does not have a valid CN label or PFS and cannot be found in the FBG, it may not be credited when served as part of the USDA School Meal Programs.



Food manufacturers continuously 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. SNT recommends maintaining and organizing this information in a manner that is easy to reference and update, such as a binder, file folders divided into categories, or organized as digital files. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

### **Product Substitutions**

If products being used are different than the usual products, it is important to evaluate how the substituted products credit. For example, on the day of breakfast meal observation, Keebler Honey Graham crackers (14 grams) were substituted for Keebler Honey Grahams with Fiber crackers (23 grams). Keebler Honey Graham crackers credit as 0.5 oz eq of grain each, while Keebler Honey Grahams with Fiber crackers credit as 1.0 oz eq of grain each. Offering one package of Keebler Honey Graham crackers (14 grams) with assorted cereal daily would have resulted in a shortage of weekly grain requirements. One package of Keebler Honey Grahams is also insufficient to count as a food item towards a reimbursable breakfast.

### **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 (SFAs) next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yields from a product than what is specified in the FBG. Additionally, an in-house yield study may be used for food items or sizes that are not currently listed in the FBG (e.g., 175 count apples). [In-house Yield Study Procedures](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) 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 is especially helpful when students are self-serving foods, such as fruits and vegetables from a bar. When vegetables offered for self-service contribute towards weekly vegetable subgroup requirements, portion sizes of at least 1/8 cup each must be communicated to students. Proper portion size utensils, such as spoodles, encourage students to take the planned portion and the amount required as part of a reimbursable meal. Consider adding signage to the meal service line, like the School Nutrition Team (SNT) [Salad Bar Signage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx), showing students how many pieces of fruits and/or vegetables to select based on the planned portion size(s) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

### **Corrective Action**

**Meal Pattern Finding #1:** Daily and weekly minimum requirements for fruit were not met for breakfast during the review period at Washington Elementary due to 1/2 cup of fruit or juice and 1/4 cup of vegetables offered daily. The daily minimum requirement is 1 cup, and the weekly minimum requirement is 5 cups. An item at breakfast is defined as 1.0 oz eq grain, 1.0 oz eq meat/meat alternate, 1/2 cup of fruit and/or vegetable, or 1 cup of milk. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

**Required Corrective Action:** Describe **specifically** how the daily and weekly minimum requirements for fruit will be met for breakfast during the review period at Washington Elementary (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address carrots, cherry tomatoes, red peppers, and celery sticks in your reply.

**Meal Pattern Finding #2:** Unacceptable crediting documentation for Great Northern Baking Company French Toast 100% WW Snack Bread.

**Required Corrective Action:** Submit a product formulation statement (PFS) for this item. If proper documentation cannot be obtained, discontinue using this product for school meals and submit crediting documentation for a replacement product. **No further action required**

**Meal Pattern Finding #3:** Recipes for Garden Salad (TAH 189) and Honey Mustard Ham Wrap (SAND 029ALA) are not standardized to Maple Grove Elementary or Washington Elementary. Crediting errors were noted in recipes for Chef Salad (SAL 003) and Chicken Caesar Wrap (SAND 032).

**Required Corrective Action:** Submit updated standardized recipes for these four menu items, which reflect corrected ingredients, portion sizes, yields, and Meal Pattern Requirements, as applicable.

**Meal Pattern Finding #4:** As the first meal period ended and the second meal period began, no one was determining reimbursable meals at the end of fruit and vegetable bar.

**Required Corrective Action:** Submit two to three sentences describing development and implementation of a plan for determining reimbursable meals at the end of the fruit and vegetable bar during both meal periods.

### **Buy American**

There are four pieces of information per non-compliant item that must be recorded on the [Buy American Non-Compliant 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) or SFA equivalent:

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.

Alternatively, schools may use the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) to track product(s) which do not have country of origin labeling and for purchases that do not comply with the Buy American Provision (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx).

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

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

- How to locate the agency's Child Nutrition program Report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, was reviewed with the SFA. The Aids Register also shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. Both resources are accessible from our [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage ([dpi.wi.gov/nutrition/online-services](http://dpi.wi.gov/nutrition/online-services)).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

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

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and 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 our 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.
- 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.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance".
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
  - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
  - Under "Purchases Services" you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
  - Under "Ala Carte", you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
  - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

## Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- 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>).

## 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>
  - 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>.

## Paid Lunch Equity

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

#### Commendations:

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Great job running this tool! The current weighted average for 2018-19 tool is \$2.69. Merrill School was not required to run the tool due for the 18-19 school year, due to a positive balance in their Food Service Account Fund 50 as of Jan. 31, 2018, per USDA .

#### Technical Assistance:

- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the [PLE 'In a Nutshell'](#) for more information on the PLE tool.
- Refer to the most recent [memo](#) from DPI.
- Refer to the most recent [guidance memo](#) from USDA.

- Step by step instructions to completing the PLE tool can be found on our [financial website](#) under Paid Lunch Equity.

### Revenue from Nonprogram Foods

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

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

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

#### Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the [minimum](#) pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.

#### Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<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>)

## Indirect Costs

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

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. 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 district's total.

### Findings and Corrective Action Needed: Indirect Costs

There were no indirect costs found in Merrill School District.

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

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

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

**Finding #1:** The Non-Discrimination form was not included on all documentation sent out to families.

**Corrective Action Needed #1:** It is a requirement that the Non-Discrimination statement be on all documentation related to the Food Service Program. The secretary was aware of the statement, however did not know that it was to be included on all documentation. This was discussed in detail with her, and also SFA. Corrected on site, no further action needed.



### And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered.

### Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

### 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. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner 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>).
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have 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. Accommodations made for students without a signed medical statement from a licensed medical practitioner 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, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide the nutrition information from the product you will be using. 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>).
- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow’s milk and pre-approved through DPI. 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, which allows juice as a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use.



### Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. **There was not any overt identification on the POS system at either Maple Grove Elementary or Washington Elementary Schools.**

### Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complain Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\_combined\_6\_8\_12.pdf).

### On-site Monitoring

#### Commendations/Comments/Technical Assistance/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 by February 1.

**On site Monitoring is being correctly done at Merrill School District.**

### FSMC

- Duties that may not be delegated to the FSMC include:
  - On-site Monitoring
  - Signature Authority
  - Edit Checks – if they are software-generated, the SFA must sign off on them

### Local Wellness Policy

#### Commendations/Comments/Technical Assistance/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 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness

policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

### 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*. This can be accessed electronically at <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).

Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies ([http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

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

**Finding #1:** SFA does not have a Local Wellness Policy (1000) as of this Administrative Review date. The Administrator had said at the entrance conference that they did not have one currently, but planned a meeting to start working on it.

**Corrective Action Required #1:** SFA does not have a LWP per Child Nutrition and WIC Reauthorization of 2004 and further requirements of HHFKA of 2010. Please provide a timeline for compliance with this rule. A DPI Wellness Policy Checklist was given to the Authorized Rep to help with designing a policy for the Merrill School District. After a policy is drafted, please provide a copy to the DPI consultant on this review.

## Professional Standards

### Commendations/Comments/Technical Assistance/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 should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- **Annual Training Requirements for All Staff**  
Directors: 12 hours  
Managers: 10 hours  
Other Staff (20 hours or more per week): 6 hours  
Part Time Staff (under 20 hours per week): 4 hours  
If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Professional Standards are being tracked and monitored by the SFA of Merrill Schools. Great job in completing yearly training for yourself and your staff! Keep up the good work!

## Water

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

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Water is provided at no charge to students at each meal service.

## Food Safety and Buy American

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

**Food Safety Plans** [A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices ([www.fns.usda.gov/ofs/food-safety-flashes](http://www.fns.usda.gov/ofs/food-safety-flashes)). While you're at it, visit the [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website ([www.fns.usda.gov/ofs/food-safety](http://www.fns.usda.gov/ofs/food-safety)) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

#### **Food Safety Inspections**

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.
- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. 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 food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

### Food Employee Reporting Agreements

- All food handlers must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- All food handlers must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.
- **Finding #1:** The Food Safety book at Washington Elementary was not in the kitchen as required, but in the directors office. When reviewing the book, it appeared to have a lot of empty pages.
- **Corrective Action Required #1:** Upon discussing this with SFA, there is paperwork related to this Food Safety Book separate from the binder, but located in the kitchen. It was recommended to keep all materials in the Food Safety Book on site at each kitchen. Corrected on site, no further action needed.

### Storage

The storage areas of each school we reviewed were neat and clean. They were also well organized.

## **Reporting and Recordkeeping**

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits 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.

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

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

#### **Breakfast Promotion**

It is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More 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>)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

#### **Summer Meals**

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. 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](#) 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](mailto:amy.kolano@dpi.wi.gov)

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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

