

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

School Food Authority: Turtle Lake School District

Agency Code: 35810

School(s) Reviewed: Turtle Lake Middle School

Review Date(s): 4/17/18-4/19/18

Date of Exit Conference: 4/19/18

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

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

General Program Reminders/Updates:

- 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, 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).
- 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).
- 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://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).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Turtle Lake School District for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- Out of the 234 students eligible for meal benefits, a sample size of 176 students was selected to confirm eligibility statuses. Out of 176 students, all students were determined correctly and had the proper documentation to support the determined benefit.
- DC runs were completed during the three required timeframes throughout the school year.
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Incomplete Applications

- Incomplete applications were sent back to the household and/or clarified by the determining official. Great job on the follow up!
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Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
 - Public release was sent out to the local newspaper.

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ **Finding #1:** It was noted that the determining official had another person look over the applications after the major rush of applications at the beginning of the year to make sure benefits were determined properly. This person only reviewed the applications at the beginning of the year and not throughout the year. This person also signed in the confirming official spot, which should only be signed when applications are selected for verification. This person did not have civil rights training.

Corrective Action Needed #1: If SFA decides to continue having another set of eyes looking at the applications, please add the second person to the contract under determining official. They would not need to sign the actual applications. This person should be reviewing all applications throughout the year, rather than selecting certain applications to review. They will also need to

have civil rights training. Please submit a statement as to how the SFA will proceed for the following school year.

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.

Findings and Corrective Action Needed: Verification

❑ **Finding #2:** One application was verified. SFA used Alternate One for verification selection and was supposed to verify two applications for this school year.

Corrective Action Needed #2: Work with the software company to assure the right amount of applications are selected for verification. Submit a statement as to how the SFA will select applications for verification next year.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFA was using a manual edit check (daily participation numbers x the average daily attendance) to determine the counts for each month. Best practice would be to work with the software company to run the Accuclaim Edits Checks every month.
- Consultant verified documentation for Severe Need Breakfast numbers and March claims. All claims were accurate.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff at Turtle Lake School District for their warm welcome and cooperation throughout the administrative review. Thank you for providing organized documentation prior to the onsite visit. In addition, reviewers loved seeing your clean and organized kitchen and the beautiful variety of fresh produce available to students. Your dedication to serving healthy and appealing meals to students is evident; keep up the great work!

Comments/Technical Assistance/Compliance Reminders

Breakfast Signage

Breakfast signage was posted 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. Signage must include this information for students and staff to reference, and so that it is clear what is included in the reimbursable meal.

In addition, it is up to the menu planner to determine in advance whether items crediting as 2.0 ounce equivalents (oz. eq.) count as one or two food items. He or she must clearly communicate to students what foods they can (must) select in order to have three food items for a reimbursable breakfast. For example, the mini-cinnis served on the day of observation was 2.0 oz. eq., so it could be counted as

either one or two food items. Be sure to communicate this well to staff determining reimbursable meals.

If you are interested in ordering signage from SNT, please visit the [Team Nutrition](#) webpage and complete the [Resource Order Form](#) (signage request is on the second page of the order form) (dpi.wi.gov/team-nutrition).

Recipes

Crediting was reviewed for the standardized recipes in use. The directions for a Crispy Chicken wrap using a 9 inch whole wheat tortilla need to be updated. The directions read, “place 2.6 oz of chicken (¾ chicken patty) and 0.5 oz of cheese on each tortilla.” The chicken patty used for the recipe is 3.54oz by weight for one patty and credits as 2 oz eq meat/meat alternate (m/ma) and 1 oz eq grains. The food management company was crediting the amount of chicken patty used in the recipe as 1.5 oz eq of meat, however, when the crediting was calculated using 2.6 oz as stated in the recipe, the crediting of meat was only 1.25 oz eq.

These are the two ways in which crediting can be calculated:

- 1) Determine the m/ma crediting by figuring out how many oz eq m/ma are in 2.6oz of the chicken patty. Cross multiplication can be used and 2.6 oz is multiplied by 2 oz eq m/ma. The resulting number is then divided by 3.54 oz.

$$\frac{3.54 \text{ oz (weight)}}{\text{In one whole chicken patty}} \div \frac{2 \text{ oz eq m/ma}}{\text{In one whole chicken patty}} = \frac{2.6 \text{ oz (weight)}}{\text{Amount of chicken patty in recipe}} \div \frac{X \text{ oz eq m/ma}}{\text{Amount of m/ma in 2.6 oz chicken patty}}$$

X = 1.4689, which would be rounded down to 1.25 oz eq m/ma in 2.6 oz of chicken patty.

- 2) Determine the crediting of 75% (¾) of a chicken patty.

$$2 \text{ oz eq in a whole chicken patty} \times 0.75 = 1.5 \text{ oz eq m/ma in } \frac{3}{4} \text{ of a chicken patty}$$

For clarity in the directions, and assurance that either by the use of weight or by taking ¾ of a chicken patty the same meal pattern crediting will be obtained, please update the recipe instructions to say 2.7 oz (by weight).

CACFP

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

More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding #3:** Breakfast signage did not list how the food items offered fit into the three requirement components at breakfast. It must also communicate what students must take under Offer vs Serve. Students must select at least three food items, one of which must be at least ½ cup of fruit, vegetable, or a combination of fruit and vegetable.

Corrective Action Needed for Finding #3: Send a picture or PDF of signage that has been posted.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot 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
- SFA had an unpaid meal charge policy on file meeting USDA’s requirements. Some further language that would be beneficial to have. See examples above.

FSMC

- Because of the Nonprogram Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all placed into Purchased Services as was previously done for SFAs with FSMC contracts.
- SFAs must annually be provided information on food costs and revenues from Food Service Management Companies (FSMC). The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements.

❑ **Finding #4:** On the Annual Financial Report, the revenues and expenses were not broken out by category and were all recorded in Purchased Services.

Corrective Action Needed #4: Please resubmit your 16-17 Annual Financial Report with revenues and expenses broken out by program and category. To do this, you will need to

contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update. Please copy the consultant on the communication.

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

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 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](#) 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>).

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

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 #5:** The FMSC completed a Nonprograms food tool that was developed by their company. USDA requires the USDA or DPI Nonprogram Foods Tool to be completed annually (see tool above).

Corrective Action Needed #5: Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool for (insert SFA) using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

- Indirect costs were not charged to the Food Service Account

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 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 or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

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.

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.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFA had a Local Wellness Policy on file that had all of the mandatory components, plus more. Great job on creating a comprehensive policy!

Resources:

- 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).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- 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>).

SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. The school day is defined as the period from the midnight before to 30 minutes after the end of the instructional school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption.

Grades K-12 are housed in the same school building and all grades have access to the beverage vending machine located in the cafeteria. Smart Snacks guidelines require that if multiple age/grade groups have access to the machine then the products must meet the requirements for the youngest age/grade group. Therefore, beverages must meet the requirements for the elementary school. Drinks like caffeinated, low-calorie (≤ 5 kcal/fluid oz.), or no-calorie beverages (< 5 kcal/8 fluid oz; ≤ 10 kcal/20 fluid oz.) beverages are unallowable. Juice must be 100% juice and must be 12 fluid oz or less.

The following products in the vending machine were found to be non-compliant with Smart Snacks standards:

- Apple Juice and Orange Juice (15.2 fl oz)
- Minute Maid Sparkling Fruit Punch (16.9 fl oz)
- Vitamin Water Zero (20 fl oz)
- Powerade Zero (20 fl oz)

Reviewer discussed with school staff some different options to bring the beverage machine into compliance, they include:

- Turn off the machine during the school day, which is midnight on the instructional day to 30 min after the last bell, or
- Make all beverages Smart Snacks compliant for elementary school and the machine may be left on during the school day, or
- Restrict access to the shelves containing non-compliant products during the school day

Here is a brief review of the two situations by which an organization may sell foods and beverages to students during the school day.

1. If foods and beverages sold are Smart Snack compliant:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This includes nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.

2. If foods and beverages sold are not Smart Snack compliant:
 - a. They can be sold after the school day or
 - b. If considered an exempt fundraiser, they could be sold during the school day but must meet the following regulations:
 - i. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
 - ii. Exempt fundraisers cannot occur in the meal service area during meal times.
 - iii. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks.

You can find more information on our [Smart Snacks](#) webpage, including the [Smart Snacks in a Nutshell](#) summary page (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Findings and Corrective Action Needed: Smart Snacks

❑ Finding #6: Products in the beverage vending machine in the cafeteria contained non-compliant products and did not meet the Smart Snacks requirements for the Elementary school.

Corrective Action Needed for Finding #6: Provide a written statement explaining how the school will ensure that the vending machine will be brought into compliance (refer to the technical assistance above for options). If you choose to bring the beverages into Smart Snacks compliance (ie, you wish to leave the machine on during school day hours) submit nutrition facts labels and ingredients lists of the new products you intend to sell.

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, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

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

Findings and Corrective Action Needed: Professional Standards

- ❑ **Finding #7:** Training was not being monitored on a centralized tracking tool.

Corrective Action Needed #7: Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

- Drinking fountains were available for students to use during meal service.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFA receives two food safety inspections per year and is waiting for their second one this year.
- FSMC had a wonderful sharing table. They had someone monitoring the table, directions for what could go on the table and a well written SOP.

Food Safety Plans

- 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.
- SFA had a comprehensive, site-specific food safety plan on-site which included all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually.

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf>).
- Employees 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.

Sharing Table

- A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and

unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

- **Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.**

Findings and Corrective Action Needed: Food Safety and Buy American

❑ **Finding #8:** No annual food safety plan review completed.

Corrective Action Needed #8: Review entire food safety plan and update as needed.

Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review page as an attachment.

Buy American Provision

The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf. When the SFA must purchase non-domestic products, whether for reasons of cost or availability, there must be documentation onsite with an explanation. Thank you to the food service director for keeping a non-compliant tracking list!

The following is a list of some Buy American reminders:

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

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

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating that the product, “was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can be accepted in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the Food Service Director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.

- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the Introduction to the Procurement Policy and Procedures Handbook
- Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

More information on this new requirement, and a template you can use to [track noncompliant products](#), can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFA kept pertaining documents on file for the 3 years plus current. Great job!

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

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFA has a school breakfast program and operates the summer food service program. Promotional materials and public releases are sent to the local library, promoted throughout the school, put in the newspapers and sent to food pantries. Great Job!

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

- All documentation was on file and the documents supported the claims.
- For WI School Day Milk, SFA charges the households for paid milk every semester or annually, depending on what the household prefers. If the students are later found on DC or submit an application, they will refund the rest of the money. However, if a paid student does not take a milk every day, SFA does not reimburse the household for the milks. It is allowable for the school to do this because the State statute does not govern the paid milks for the WSDMP. However, the SFA should be transparent about charging the household one lump sum upfront and it would be a best practice to refund households for days when their child does not participate.
- WSDMP should be serving milk that is WI produced.

- ❑ **Finding #9:** The milk served to students for the WSDMP is not from milk produced in Wisconsin. It is from Minnesota. Refer to question 12 of the [WSDMP FAQ](#). All or part of the raw milk used by the milk processor must be produced in Wisconsin. The goal of this program is to support Wisconsin dairy farmers.

Corrective Action #9: Contact your milk vendor to get a statement as to whether a percentage of the raw milk used is from WI. Submit a copy of that statement. Otherwise, submit a statement of how you will make sure all or part of the milk served within the WSDMP is from raw milk produced in Wisconsin.

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>).

