

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

School Food Authority: Two Rivers School District

Agency Code: 365824

Review Date(s): April 24-25, 2019

School(s) Reviewed: Two Rivers High School

Date of Exit Conference: April 25, 2019

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at a nominal charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin [DPI School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training) (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin [DPI GOALS webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- Wisconsin Team Nutrition is hosting a Teaming Up to Increase Participation workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop) (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

Appreciation/Commendations/Noteworthy Initiatives:

From the NPC:

Thank you to the staff at Two Rivers School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The DPI review team appreciates the eagerness of the staff at for their willingness to make alterations to meet school nutrition program regulations..

The Food Service Director takes so much pride in her work and has great communication with team members and school staff. Two Rivers School District's food service staff view the cafeteria and food service as a classroom for students to learn what builds a healthy meal. The team has posted creative, hand-made signage in the service area and the Food Service Director offers hands-on culinary experiences for students each fall. She does a phenomenal job, so keep up the great work!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- ✓ All applications were accurately approved and denied
- ✓ Direct Certification (DC) is run in the correct timeframes
- ✓ The Benefit Issuance (BI) list is appropriately maintained
- ✓ Students' eligibilities are accurately transferred to the Point of Service (POS) and no over identification is occurring

Technical Assistance:

- When students are found on DC and qualify for meal benefits, whichever day the DC run was completed is the eligibility approval date reported on the BI list. Currently, the Determining Official (DO) is setting the approval dates for when she physically records the DC eligibility in the school's Skyward software system. This means some students are not receiving their meal benefits as early as they should.
- **The program name on a free and reduced priced meal application must be listed in order for it to be considered complete, and therefore, be approved.** These program names and a 10-digit case number cause students to be categorically eligible for free meals. Badger Care and Medicaid are *not* acceptable program names.
- Only annualize the total income on a free and reduced price meal application if there are multiple income frequencies (e.g. bi-weekly, weekly, etc.) on any single application.

Verification

Commendations:

- ✓ The Verification process was completed by November 15
- ✓ The Verification process was completed correctly with appropriate household notification letters
- ✓ The Verification Collection Report (VCR) was completed accurately and is a reflection of the Verification process results

Technical Assistance:

- Verification is considered complete once the “We Have Checked” letter has been sent to the household(s). This needs to be by November 15.
- The Determining Official (DO) makes the initial *determination* of a free and reduced meal application’s eligibility. The DO then signs the back of the application; this is the date recorded on the BI list. Come time for Verification, the Verifying Official (VO) will select the applications to be verified, and then passes them to the Confirming Official (CO) to *confirm* the initial determination. The VO and CO both sign the back of the applications selected for Verification.
 - The DO and CO cannot be the same person; the DO and VO can be the same person.
- If a student’s meal eligibility is decreased due to the results of the Verification process (e.g. free to paid meals), and this student is then found on a DC run qualifying him or her for meal benefits, the student will then qualify for these new meal benefits from DC.

Meal Counting and Claiming

Commendations:

- ✓ The review period’s counts accurately reflect the claim for reimbursement
- ✓ Accuclaims produced through the Skyward software system is reviewed prior to claim submission

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ Finding #1: The POS at lunch for Two Rivers High School needs to be altered. Currently, lunch counts are taken at the beginning of the line and a la carte purchases are made at the end of the line. Student ID numbers are entered at the beginning of the line POS and the students understand this means they are getting a reimbursable meal, not a la carte items. However, it could cause confusion at times, and in order to ensure counts are as accurate as possible, the POS must be altered. While the review team is confident in the lunch counts, it is possible for a student to enter his/her ID number (thus being claimed for a reimbursable meal) and then select a la carte items instead if he/she changes his/her mind. Food service staff are knowledgeable of what constitutes a reimbursable meal; the issue is with students potentially changing their minds about what they choose to select after going through the POS.

Corrective Action Needed: Please submit a statement into SNACS explaining the new POS for lunch at Two Rivers High School.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Comments/Technical Assistance/Compliance Reminders

Week of Review

There was a daily fruit shortage on Tuesday and Friday of the week of review. Production records indicate that only ½ cup of fruit was offered to students. The minimum daily amount required to be offered to students is 1 cup fruit for High School students.

Fiscal action is required for select repeat violations found during an Administrative Review (AR). Because a daily fruit shortage was found during the last AR as well as the current AR, fiscal action will be applied. There will be a re-claim for meals on the day with the lowest participation that had the daily fruit shortage. The following finding was documented from the School Year (SY) 2015-2016 AR, which is a repeat finding during the current AR:

- On Wednesday, December 9th, the fruit offered at lunch was fresh orange quarters. Two quarters were provided which is ¼ cup.

Breakfast

It is recommended that the menu planner limit the amount of grains the students have access to at breakfast. Currently students may select a bag breakfast, which contains 1 oz eq grain, 1 oz eq meat/meat alternate (counts as a grain at breakfast) and a ½ cup fruit, and up to two slices of bread (2 oz eq grain). All together, these students may select 4 oz eq grain every day. This greatly exceeds the recommended grain maximum of 10 oz eq grain for High School students over the course of the week. Refer to the [breakfast meal pattern table](#) for daily and weekly amounts of each food component. Visit the [School Breakfast Program](#) webpage for more information.

In regards to the menu offerings, 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. An item at breakfast is defined as 1.0 oz eq grain, 1.0 oz eq meat/meat alternate (counts towards the grain component), ½ cup of fruit and/or vegetable, or 1 cup of milk. This must be communicated to students so that they know what foods they can (must) select in order to have three food items for a reimbursable breakfast. (For example, the packaged pancakes served on the day of observation were 2.0 oz eq, so it could be counted as either one or two food items). Be sure to communicate this with all point of service staff and those determining reimbursable meals, as well.

Signage must also be posted to communicate to students what they must select in order to make a reimbursable meal. The breakfast signage should list the day's menu options for each of the three components and inform students that under Offer versus Serve (OVS), they must select at least 3 items, including ½ cup of fruit, vegetable, or fruit/vegetable combination.

Signage examples can be found on our [Signage](#) web page. You may also order signage from [Team Nutrition's resource order form](#).

Lunch

Signage helps students understand what components make up a reimbursable meal, and your signage was fun and creative! Please add a statement to your current signage (Map out a healthy lunch) that says students must **take at least ½ cup** fruit and/or vegetable, or a combination.

Salad bar Signage

Reviewers loved seeing the colorful salad bar with a wide variety of fresh fruits and vegetables. Keep up the great work! Because the vegetables on the salad bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students

with signage. [Salad Bar Signage Template](#) can be found on our [Signage](#) webpage, under the heading Additional Signage Resources.

Production Records:

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record all foods offered as part of the reimbursable meal, planned serving sizes for each menu item, additional details about fruits and vegetables served (e.g., canned, sliced, cubed, whole etc.) and planned/actual quantity prepared in purchase units. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Technical assistance was given to include the above mentioned information on the production record template.

On breakfast production records, if a line item states “cereal or bar” be sure to circle what was served so it is clear what was offered as part of the reimbursable meal. Additionally, include more detail about the type of fruit served. Instead of writing peaches, include whether or not they were canned, fresh or in a cup.

Breakfast production records need to include the following information: grade groupings (9-12), separated number of student and adult meals and planned/actual quantity prepared in purchase units.

Standardized Recipes:

Anytime two or more ingredients or food products are combined together, a standardized recipe must be made. This includes grab n’ go bag breakfast and lunch bags. Technical assistance was provided for the recipe standardization process. Recipe standardization ensures that each meal is consistently planned to meet the daily and weekly requirements. As discussed onsite, the breakfast and lunch bags need to have a recipe with instructions for how to assemble the bags correctly, no matter who is preparing them. Additionally, since the bags are intended to contain a reimbursable meal without the student having to select any other meal component, the bag should contain at least three full components, one of which is a ½ cup of fruit, vegetable or a combination of fruit and vegetable. The definition of a full component is the daily minimum requirement for High School students, which are 1 cup fruit, 1 cup vegetable, 2 oz eq grain, 2 oz eq meat/meat alternate and 1 cup milk. For simplicity of making the grab n’ go bags, it is recommended that each one contain at least 2 oz eq grain, 2 oz eq meat/meat alternate and a ½ cup of fruit, vegetable or a combination of the two. The students must still have access to at least a full cup of fruit and vegetable apart from the grab n’ go bags. Remember that Offer vs. Serve defines what must be on a student’s tray to be considered a reimbursable meal and is separate from what you must offer to students as defined in the [Meal Pattern](#).

Visit our [Standardized Recipes](#) and [Menu Planning](#) webpage for additional tools and resources.

Crediting

Menu items such as the BBQ Shredded Pork and the Taco Filling with Pork must be weighed prior to determining the correct serving size. Each product specifies the weight (using a kitchen scale) that must be served in order to credit the amount as listed on the Child Nutrition (CN) label. For example, for the BBQ Shredded Pork a 4 oz (by weight) serving is required in order to credit that amount of meat as 2 oz eq meat/meat alternate.

During the week of review, a ⅓ cup serving size of pork was provided to students; however, the weight of that serving size is unknown. Next time this product is menued, be sure to weigh out a ⅓ cup of the

shredded pork. If the weight is 4 oz, then the serving size is acceptable for High School students. However, if the weight of a 1/3 cup portion is less than 4 oz, then additional meat will need to be added to each serving to ensure students receive at least 4 oz by weight. You will need to determine the spoodle size that best fits that amount of meat and that serving utensil will be used for the portioning of the shredded pork. Be sure to update production records and recipes, if applicable.

Vegetable Subgroups

A menu planning worksheet was submitted along with the crediting documentation prior to the onsite review. Review of the worksheet revealed that green peas, green beans and corn were being credited incorrectly. Green peas and corn credit as a *starchy* vegetable and green beans credit as an *other* vegetable.

As discussed onsite, the vegetable subgroups are categorized based on nutrient composition. In order to ensure that students are getting a variety of nutrients each week, the USDA lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. As an example, beans and peas (legumes) are excellent sources of dietary fiber and nutrients such as folate and potassium. Some foods commonly referred to as beans and peas, such as green peas, lima beans, and green beans, are not considered part of this vegetable subgroup because their nutrient profile is not like those of legumes. Refer to the [Vegetable Subgroups handout](#) from the [Menu Planning](#) webpage to identify commonly eaten vegetables in each subgroup.

Training

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, crediting, smart snacks and record keeping requirements. Travel/meal expenses are allowable food service expenses.

The 2019 School Nutrition Skills Development Courses (SNSDC) dates and locations have been released:

- Appleton (Fox Valley Technical College): July 16-18, 2019
- Milwaukee (Alverno College): July 23-25, 2019
- Rice Lake (Wisconsin Indianhead Technical College): July 30-August 1, 2019
- Middleton (Kromrey Middle School): August 6-8, 2019
- Wausau (Northcentral Technical College): August 13-15, 2019

Registration and class schedules will be posted to the website in early May. Please visit the [Training](#) webpage for more information (<https://dpi.wi.gov/school-nutrition/training#up>).

Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts](#) webpage.

Field Trip Meals

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way to collect meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and

vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

Flavor Stations

According to the [Smarter Lunchrooms Movement](#) a flavor station with herbs and spices allows students to personalize their meals and offers a way to experiment with different flavors. Reviewers loved to see your personalized spice mixes (e.g., Raiders Ranch), however, be sure that the mixes are calorie free and sodium free. The salt in the spice mixes will contribute to the meal's sodium content. In this way, it is strongly recommended to only offer spices without any salt added. Consider lemon juice, parsley flakes, garlic powder, cinnamon, pumpkin pie spice, chives, vinegar or salt-free blends.

Additional Resources

The [School Nutrition Outreach Toolkit](#) provides resources and tools for school nutrition professionals to effectively promote their school nutrition programs and showcase why Wisconsin school meals rock. This web-based toolkit contains a number of handouts that can be customized to fit your needs.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding #2: Daily fruit shortage at lunch for the week of review.

Corrective Action Needed: Submit a statement explaining how the daily fruit shortage will be fixed for the week of review so that 9-12 students are offered 1.0 cup of fruit, daily.

Finding #3: Missing breakfast reimbursable meal signage.

Corrective Action Needed: Submit a picture of the added breakfast signage.

Finding #4: Lunch signage missing the statement that instructs students to take at least a ½ cup fruit and/or vegetable, or combination.

Corrective Action Needed: Submit a picture of the updated lunch signage that contains the above mentioned statement.

Finding #5: Incomplete breakfast production records.

Corrective Action Needed: Submit a week of completed production records, making sure to include the grade groupings served, the number of planned and actual student and adult meals and the planned and actual quantity prepared of each food item in purchase units (e.g., case, box, bag etc.). Choose a week after the administrative review and before the corrective action due date.

Finding #6: Standardized recipes missing for breakfast and lunch grab n' go bags.

Corrective Action Needed: Submit standardized recipes for the breakfast and lunch grab n' go bags.

❑ **Finding #7:** Unknown crediting for the BBQ Shredded Pork and the Taco Filling with Pork. The 1/3 cup serving sizes were not weighed on a kitchen scale to determine the weight of product in each serving.

Corrective Action Needed: Since these products will not be menued again this school year, submit a statement of understanding regarding the importance of knowing the weight of products like these that specify on the CN label what weight must be served in order to provide the stated crediting. Include details about how crediting for these types of products will be determined in the future.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

3. SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

For all a la carte food options, that were not menued that day on the main line, or on the previous day's main line, must have acceptable portion sizes to be compliant with the Smart Snacks standards. Many times these entree options contain too many calories, total fat and/or sodium to be compliant with Smart Snacks standards.

Entrees may only be exempt from the Smart Snacks nutritional standards when they are offered the day the same item is sold on the main line, or the day after the entree item was menued on the main line. Additionally, accompaniments such as cream cheese or cheese sauce need to be included in the nutritional analysis. This means that if marinara or dipping sauce were to be sold with a breadstick or mozzarella stick, then the calories of the dipping sauce would need to be added to the nutritional information of the entree item it is paired with. When the nutritional information is calculated for the entree and the accompaniment then it must be entered into the Smart Snacks product calculator to determine compliance.

This process of determining compliance is also true for any recipe item sold a la carte (salads, sandwiches, wraps, veggies and dip etc.), that is not menued that day on the main line or was not menued the previous day.

Smart Snacks regulations allow entrees to be sold a la carte and be exempt from the nutritional standards, if and only if, they were served the same day or the day after the original entree was served on the main line.

Fundraisers

There are no fundraisers currently held at the High School. As a reminder, all foods or beverages sold to students during the school day must meet Smart Snack standards. If they do not, even if an infrequent occurrence, they must follow the regulations as stated below:

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant; using DPI-provided tracking tools is a great way to make sure schools are meeting Smart Snacks regulations.

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Vending machines

There are multiple vending machines in the cafeteria, two beverages machines and two snack machines. Currently no documentation is onsite for the contents of these machines, and many food and beverage options appear to be non-compliant. However, without the proper documentation, compliance with Smart Snacks standards could not be assessed.

All foods sold to students, including those offered in a vending machine must meet Smart Snacks standards if the machine is available to students during the school day. The school day begins at midnight on the instructional day and ends thirty minutes after the last school day bell. Food sold for consumption during that time must be compliant or meet exemption requirements.

Findings and Corrective Action Needed: Smart Snacks

Finding #8: A la carte items sold in the cafeteria not checked for Smart Snacks compliance. Many foods offered did not have recipes or nutrition information to accompany the product.

Corrective Action Needed: Submit a statement of understanding regarding the rules about Smart Snacks for a la carte sales. Detail your plan to bring the a la carte sales into compliance.

Finding #9: No documentation for beverage or snack machines in the cafeteria. Products not checked for compliance.

Corrective Action Needed: Submit documentation for all beverages and snacks sold in the vending machines in the cafeteria. Submit the name of the person who will be in charge of keeping this documentation and checking product compliance. Discuss your plan to bring the machines into compliance.

4. BUY AMERICAN PROVISION

Commendations

The food service director has completed non-compliant product sheets for the food items that are non-domestic. Continue to review products before purchasing and as you are receiving them. Fill out any additional non-compliant product sheets as necessary. Below is additional information about the Buy American Provision.

Comments/Technical Assistance/Compliance Reminders

The USDA requires that School Food Authorities (SFAs) purchase, to the maximum extent practicable, domestic commodities or products. It is each school's responsibility to ensure USDA dollars are spent on American grown products. Non-domestic items must have sufficient documentation, as outlined below.

A "domestic product" is defined as an agricultural commodity or product that is produced or processed in the United States (U.S.), including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands. "Substantial" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically.

If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) 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.

The following information must be recorded on a Buy American Non-Compliant Product List. *Note:* In reference the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

When completing the [Buy American Non-Compliant Product list](#) there are 4 pieces of information that must be recorded:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
 - i. *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
 - b. **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
 - i. *Ex. Blueberries are not available domestically during the months of December – June.*
 - c. **Availability** – Product(s) is not available to purchase domestically.
 - i. *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
 - d. **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)

- i. *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
- e. **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - i. *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
- f. **Other**- Please provide a written explanation.
 - i. *Ex. The SFA received a donation of non-domestic oranges*
 - ii. *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Include the Buy American Provision in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory are compliant with the Buy American procedure. Sample written [Procurement Contract Management Procedures](#) and Buy American monitoring procedures may be used and adjusted to meet the SFA's needs (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>).

FRESH FRUIT AND VEGETABLE PROGRAM

Commendations

Thank you for participating in the Fresh Fruit and Vegetable Program! A nice variety of fruits and vegetables are offered several times per week.

During the onsite observation of FFVP service, it was noted that one teacher was distributing another snack (cereal and crackers) immediately after the vegetable snack was distributed (students were eating the FFVP snack at the same time as this additional snack). The intent of FFVP is to get students to sample new fresh fruits and vegetables and anything that undermines that effort should be prevented.

FFVP must be offered at a dedicated time separate from another snack time, this increases the likelihood that more kids will try the day's FFVP offering.

Findings and Corrective Action Needed: Fresh Fruit and Vegetable Program

❑ **Finding #10:** To support operating labor claimed, daily hours spent on FFVP are tracked on employee time cards. However, the FFVP tasks performed during this time are not tracked. To determine whether grant funds are being allocated and claimed appropriately, it is necessary to know what tasks are actually performed. An Employee Time Sheet is posted on our [FFVP](#) webpage that may be used for tracking administrative labor (<https://dpi.wi.gov/school-nutrition/ffvp>).

Corrective Action Needed: After submitting April's FFVP claim, please submit a completed time sheet that supports the labor claimed that month.

❑ **Finding #11:** Another snack (cereal and crackers) offered at the same time as the FFVP snack.

Corrective Action Needed: Provide a written statement detailing the steps Koenig Elementary will take to correct this practice and include a timeline for when the issue will be corrected.

5. RESOURCE MANAGEMENT

Non-profit School Food Service Account

Commendations:

- ✓ All costs to the food service account are allowable
- ✓ Time studies are utilized for charging custodial staff's salaries to the food service account
- ✓ The account maintains its non-profit status
- ✓ Annual Financial Report (AFR) is submitted timely and is an accurate reflection of the food service account
- ✓ The food service account maintains a non-profit status

Technical Assistance:

Annual Financial Report (AFR)

- **The entitlement value of USDA Foods (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP. Any handling and processing fees must be recorded as a School Purchased Services Expenditure.**
 - The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services webpage](https://dpi.wi.gov/nutrition/online-services) (dpi.wi.gov/nutrition/online-services).

Findings and Corrective Action Needed: Non-profit School Food Service Account

❑ **Finding #12:** An Unpaid Meal Charge Policy is written at the SFA, but does not reflect how unpaid meals are currently handled, nor is the policy enforced.

Corrective Action Needed: Please submit a statement explaining if the policy will be rewritten and/or better enforced to ensure the financial integrity of the school meals programs.

Resources:

- Unpaid Meal Charge resources are on the [SNT Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
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Paid Lunch Equity (PLE)

The Paid Lunch Equity (PLE) tool was not required for Two Rivers School District during the 2018-19 school year, as it had a zero or positive fund balance in its food service account as of January 31, 2018. **For the 2019-20 school year, a similar exemption will take place with the completion of the [2019-20 PLE survey](#) by June 7, 2019** (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Revenue from Non-program Foods

Technical Assistance:

- The revenue from non-program foods must be enough to cover the costs of these foods. Non-program foods include all items sold from food service beyond the reimbursable meals (e.g. catering, adult meals, extra milks, a la carte items, etc.).
- The Non-Program Food Revenue Rule's requirement is that **the costs of non-program foods** (adult meals, extra milks, a la carte items, caterings, vending machines, etc.) **are covered by the non-program foods revenue**. The food service account is a protected account as it contains federal and state dollars for the service of meals that follow the meal pattern. As non-program foods are paid for out of this protected account, in actuality, they could be paid for using reimbursement funds. To ensure reimbursement funds are not being used to support non-program foods, it is required to assess the comparison of non-program and program costs and revenues. This comparison may be completed using the [DPI tool](#) or the [USDA tool](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls).

Findings and Corrective Action Needed: Revenue from Non-program Foods

Finding #13: The adult meal price is too low at Two Rivers School District. Currently, the highest paid student meal price is \$2.80 and the adult meal price is \$3.35.

Corrective Action Needed: Submit a statement explaining that the price of the adult meal will be raised following the adult meal pricing guide (under *Resources*) for the 19-20 school year.

Finding #14: The SFA has not demonstrated compliance with the [USDA Non-Program Foods Revenue Rule](#), as the DPI nor the USDA Non-Program Foods Revenue tool has been completed (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Corrective Action Needed: Please submit a completed DPI or USDA tool to demonstrate compliance with the Non-Program Food Revenue Rule. Complete this using a five-day reference period and upload it into SNACS.

Resources:

- [Adult meal pricing guide](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc)
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6. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

- The following individuals require annual Civil Rights training:
 - All officials (DO, CO, VO, HO), financial manager, and all food service staff members
- It is recommended for the following:
 - Teachers administering BIC, FFVP, SMP, and/or WSDMP; paid and volunteer cafeteria aides; student workers; custodians; and delivery drivers.
- USDA's Non-Discrimination Statement must be listed on all communications with the public regarding the school meals programs. ***This institution is an equal opportunity provider*** or the [lengthened statement](#) must be used (dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights).

Civil Rights Complaint Procedures

- 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 five days. You will want to make sure that this is included in the district procedures to ensure compliance.
 - The 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 Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

Finding #15: The following items do not have the non-discrimination statement: menus and Local Wellness Policy

Corrective Action Needed: Please revise these updated items and upload them into SNACS.

Finding #16: Civil Rights complaint procedures specific to meal programs are not in place.

Corrective Action Needed: Submit a statement into SNACS detailing how the procedures will be developed and implemented next school year.

On-site Monitoring

Technical Assistance:

- On-site monitoring is required to be completed for all lunch sites and for 50% of the breakfast sites. They must be completed annually by February 1.

Local Wellness Policy (LWP)

Technical Assistance:

- A LWP is in place to set the standard for student, school, and community wellness. Develop your policy to include specific goals for your school and assess these goals annually to ensure your school is promoting local wellness to the best of its ability.
- The LWP is to be reviewed and updated, as necessary, on an annual basis. It also must be properly assessed every three years (triennial assessment). Reference the [LWP webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) for more information (<https://dpi.wi.gov/school-nutrition/wellness-policy>).
- Encourage all to participate in the wellness committee. The invitation may be extended to students, parents, and members of the community.

Findings and Corrective Action Needed: Local Wellness Policy

Finding #17: A new LWP is under development as the current LWP does not meet requirements.

Corrective Action Needed: Submit a draft LWP for review and/or submit a timeline of when it will be implemented and who is on the LWP committee and will oversee its implementation. Upload this into SNACS.

Resources:

- Consider utilizing the [LWP Checklist and LWP Builder](https://dpi.wi.gov/school-nutrition/wellness-policy) when modifying or creating a new LWP (<https://dpi.wi.gov/school-nutrition/wellness-policy>).

Professional Standards

Commendations:

- ✓ The SFA is currently tracking food service employees' trainings. Thank you!

Technical Assistance:

- Annual Professional Standards training requirements are in place to uphold the nutritional and fiscal integrity of the school meals programs. The annual training hours are required:

- Food service director: 12 hours
- Food service manager: 10 hours
- Full-time staff: 6 hours
- Part-time staff: 4 hours
- The following are required to have their annual Professional Standards trainings **tracked**:
 - School nutrition directors, managers and staff, plus persons acting in these roles for more than 30 days per year.
 - School nutrition substitutes and volunteers, cashiers determining reimbursable meals at Point of Service (POS), office staff with school nutrition program duties (submitting claims for NSLP, SBP, ASP, SMP, WSDMP and/or FFVP, processing free and reduced price applications, verification, or financial management).
- SFAs may use the DPI Professional Standards tracking tool, or it may create its own. The trackers must include the following information:
 - Employee name
 - Date of hire
 - Employee position
 - Full-time or part-time
 - Completed trainings and length of these trainings

Findings and Corrective Action Needed: Professional Standards

Finding #18: The business manager is completing required trainings, but they are not tracked.

Corrective Action Needed: Upload a statement into SNACS regarding how these trainings will be tracked in the next school year.

Resources:

- [Professional Standards "In A Nutshell"](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf)
- [Professional Standards Training Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf)
- [DPI Professional Standards training tracker](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx)

Food Safety and Storage

Technical Assistance:

- Standard Operation Procedures (SOPs) are required for the handling of field trip meals. If in the future the SFA decides to serve field trip meals to students through food service, a SOP must be developed. Consider utilizing [DPI SNT's template for field trip meals](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx).
- Temperature logs must be retained for a minimum of six months.
- The most recent food safety inspection report must be posted in a publicly visible location.

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

Commendations:

- ✓ SBP outreach completed. Thank you!

Technical Assistance:

- SBP outreach is to be completed prior to the beginning of the school year and SFSP outreach is to be completed prior to the end of the academic school year.
- A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, **USDA requires 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 webpage](http://www.fns.usda.gov/summerfoodrocks) (http://www.fns.usda.gov/summerfoodrocks)

Findings and Corrective Action Needed: SBP and SFSP

Finding #19: SFSP outreach does not include the required information.

Corrective Action Needed: Please submit a draft poster into SNACS.

Resources:

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

7. COMMUNITY ELIGIBILITY PROVISION (CEP)

The Community Eligibility Provision (CEP) is a 4-year reimbursement option for eligible local educational agencies (LEAs) and schools participating in both the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that wish to offer free school meals to all children in high poverty schools without collecting household applications.

Some benefits of being a CEP school are as follows:

- Lunch and breakfast are served free to all students in participating schools

- No household applications for free and reduced meals are collected
- No verification of free and reduced applications is required
- Potential for increased meal participation rates, especially breakfast
- Simplifies the counting and claiming process by not having to track free, reduced and paid students

Visit the [DPI SNT CEP webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) for more information and resources (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](http://dpi.wi.gov/statesupt/every-child-graduate) webpage (<http://dpi.wi.gov/statesupt/every-child-graduate>).”



With School Nutrition Programs!